

BRISTOL BAY NATIVE ASSOCIATION

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- Aleknagik*
- Chignik Bay*
- Chignik Lagoon*
- Chignik Lake*
- Clarks Point*
- Curyung*
- Egegik*
- Ekuk*
- Ekwok*
- Igiugig*
- Iliamna*
- Ivanof Bay*
- Kanatak*
- King Salmon*
- Kokhanok*
- Koliganek*
- Levelock*
- Manokotak*
- Naknek*
- New Stuyahok*
- Newhalen*
- Nondalton*
- Pedro Bay*
- Perryville*
- Pilot Point*
- Port Heiden*
- Portage Creek*
- South Naknek*
- Togiak*
- Twin Hills*
- Ugashik*

January 14, 2026

Alaska Board of Fisheries
Alaska Department of Fish and Game
1255 W. 8th Street Juneau, AK 99811
marit.carlson-vandort@alaska.gov

Subject: Comments on Proposals

Dear Ms. Carlson-Van Dort and Board Members:

Bristol Bay Native Association (BBNA) is a federally recognized tribal consortium governed directly by the 31 sovereign Tribes of the Bristol Bay region. Incorporated as an Alaska Native non-profit but structured purely as a tribal consortium, BBNA exists to carry out the collective will of its member Tribes through pooled resources, coordinated action, and delegated authority. Our Board is made up of Tribal presidents or their designated Tribal members, ensuring that our work is controlled by Tribal governments themselves. Authorized under the Indian Self-Determination and Education Assistance Act as a “Tribal Organization,” BBNA manages and administers programs, grants, and contracts on behalf of our Tribes, represents them before federal and state agencies, and advocates for their rights and priorities. We operate as an extension of Tribal governments, strengthening sovereignty and self-determination by delivering programs that support cultural continuity, economic stability, and social well-being, while ensuring that Tribal voices drive decisions, services, and long-term regional sustainability.

The BBNA Executive Committee reviewed Bristol Bay Finfish proposals and took the following positions:

- Support the existing Nushagak King Salmon Stock of Concern Management Plan as written, **oppose Proposals 61–62**. Strong support for the existing plan as well-vetted, balanced, and functioning as intended. BBNA does not want to see any changes to the Nushagak King Salmon Stock of Concern Management Plan as it hasn’t even gone through a full cycle of a salmon and the plan will need to have time to see what changes will need to be made at a future meeting, if any changes at all.
- Support the existing 32-foot vessel limit. **Oppose 82-91**. Since 1949, the beginning of the fishery the vessel length has always been 32 feet. It’s working and we see no reason to change the length or any modifications to add any length to the 32 feet. For more than seventy-five years, Bristol Bay’s drift gillnet fleet has operated under a clear and simple rule: the maximum vessel length is thirty-two feet. That limit was not accidental; it was

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set to keep the fishery stable, accessible, and resistant to an arms race of bigger, more expensive boats. “Close enough” is not compliance.

Add-ons that push boats past the limit, creative measurements, and selective enforcement all undermine trust in the system. If the length is 32 feet, that’s what it means, 32 feet. Enforcement should be enforced that way, fairly and consistently, for everyone.

- **Oppose permit stacking changes, **Oppose 75–78.**** Permit stacking goes against the original intent of the limited entry permit program.
- **Oppose Proposal 188** Togiak herring allocation increase to Dutch Harbor food and bait fishery. Oppose concerns were raised about cumulative impacts, including how this might interact with potential North Pacific Fishery Management Council bycatch changes (noted as a possible increase from 1% to 2–3% of biomass, with potential impacts by fall 2026).
- **Oppose Proposal 44** king salmon home pack limits. Proposal 44 would impose numeric caps and mandatory reporting on subsistence and commercial home-pack king salmon harvest, fundamentally changing subsistence practice without regional support or clear conservation benefit.

Thank you for your consideration on these proposals. BBNA would also like to emphasize how important fisheries management decisions are and how they affect our people and our local economy. The subsistence and commercial economy are important for the fisherman in the Bristol Bay region. A viable local economy allows families to afford modern life without leaving the region. BBNA is available to answer any questions in regard to the above mentioned proposals.

Sincerely,

Dan Breeden

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President & CEO
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