



Dear Members of the Alaska Board of Fisheries:

We are writing in regard to the proposal to increase escapement goals in Bristol Bay. We think it is premature to change the goals at this time. Meaningful public review is a critical part of this process considering the potential impacts this change could bring. We believe extensive consultation with harvesters and processors is needed on the economic impacts of these changes and scientific study is needed to better assess how realistic it would be to actually achieve any perceived benefits of switching from a system that is known to provide sustained yields to a system that provides the greatest potential maximum sustained yield. There is not enough time for any real independent review.

At this time, we do not know of any assessment that considers the economic impact and the current fleet's ability to harvest any increased runs that might occur if the new policy succeeded in increasing average harvestable surpluses. If returns are indeed larger, what is the potential for higher over escapements and what are the impacts of those over escapements at higher escapement goals and higher total run levels? Is it possible that larger escapements would result in higher peaks in run cycles and lower valleys? Huge variations in run sizes are counter-productive when trying to maintain an economically viable industry.

Rather than make the proposed changes at this time, we urge you to continue with existing escapement goals that have been working while completing a process of consultation in the short term and scientific study in the longer term to better assess the impacts of those changes.

Thank you for your consideration,

Mark Palmer

President/CEO Ocean Beauty Seafoods, LLC.