

To: The Alaska Board of Fisheries

From: Joe Kelso- Ekuk Fisheries

Re: Public Comment

I am the owner of Ekuk Fisheries, a salmon processing company located in Nushagak Bay. I am one of the last, and smallest independent processors still operating in the Bristol Bay region. I work with approximately 100 set net harvesters on the Ekuk beach.

I strongly oppose the recommendation by the Department of Fish and Game to increase the escapement goals. The escapement levels that are currently in place have produced near record runs in the recent past. It is evident they are working. As the Bristol Bay Salmon fishery approaches a downsizing in run volume the economic impact on every harvester is significant. The 2013 prediction is approximately half the size compared to some of the more recent salmon runs. The timing of these proposed increases couldn't be worse and in the face of this downturn the proposed increases are significant. There is no guarantee that increasing the escapement levels will increase the run volume. As a matter of fact there is a distinct possibility that it will have no effect whatsoever. It is possible the increases may even have a detrimental effect. Before we change something that has a successful and empirically proven record, I would urge you to consider a more pragmatic approach. An approach that would allow additional research, over time, to give us a data based analysis resulting in an analytical result. A result we could quantify, so we have some idea or at least an expectation of the benefit these increases will bring.

100% of Ekuk Fisheries' salmon production comes from the Ekuk Beach set net harvesters. Both parties have a large and negative economic exposure to the Wood River Special Harvest Area (WRSHA). If the WRSHA is triggered and goes into effect due to an evaluation of weak escapement to the Nushagak, 100 set netters and Ekuk Fisheries stops operating. The WRSHA essentially puts the entire Ekuk Beach, both the harvesters and the processor, out of business. It has happened twice in the last three years and has been very close to happening many times over the last eight years. The proposed increase in the escapement level of the Nushagak River could move those close calls to trigger levels and has the potential of rendering the entire Ekuk Beach economically unviable for the future.

Additionally, I would like to speak to the conservation of the King Salmon run in the Nushagak District. I would encourage all of you to look favorably toward any commercial or sport fishing policy coming out of committee regarding the conservation of Nushagak King Salmon. This is an early run and any early sockeye we may miss out on commercially go straight to acquiring the Nushagak escapement goals which help keep the WRSHA off the table.

Thank you,

Joe Kelso

Ekuk Fisheries LLC