

TO: The Alaska Board of Fish

RC 091

FROM: Joseph Kelso

Subject: BRISTOL BAY FISH PROPOSAL

DATE: December 3, 2015

My name is Joe Kelso. I am the owner/operator of Ekuk Fisheries. Ekuk is a Processing company which is located in the Nushagak District in Nushagak Bay on the west side of Bristol Bay. 11 years ago we made a decision to focus our business on the set net operations on the Ekuk beach. Ekuk Fisheries is sensitive to any issues regarding set netting in general, and specifically set netting in the Nushagak District. Thank you for your consideration regarding the following;

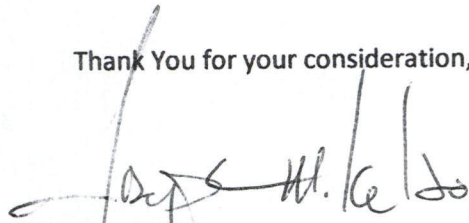
Proposal 64- Oppose, This proposal may not look allocative at first glance but it will become allocative in its implementation. Passing this proposal will mandate the start time for every fishing period for the entire drift fleet 3 hours ahead of the high water level of the tide. In an effort to compete against each other, the drift gillnet fleet will move their harvesting efforts to the outside boundary of the district and create a line fishery. Essentially, this creates a blockade of drift gillnets of the entire district.

Under our current program the Area Manager **chooses** the start time for each drift period. In doing so, it allows fish to spread throughout the district unmolested, which allows the drift fleet to spread out and the set net harvesters then have an opportunity to compete for the catch as well.

The current management program employed by the Area Manager has worked perfectly as evidenced in "Overview of the Bristol Bay Commercial Salmon and Herring Fisheries" (RC 3 tab 2, page 10). This was the report that Tim Sands reviewed with the entire Board on December 3, 2015. Page 10, included shows the Harvest Percentages vs. Allocation from 2008 to 2015. The average allocation of catch compared to the regulatory allocation is perfect for the last seven years. Clearly the current system is working fine and opposing proposal 64 will allow it to continue to work.

There are unintended consequences associated with this proposal regarding allocation, and it handcuffs The ADF&G Area Manager's flexibility in managing the fishery. **Please join me in my opposition to Proposal 64.**

Thank You for your consideration,



Joseph M Kelso
Owner
Ekuk Fisheries LLC

Harvest Percentages vs. Allocation (2008-2015)

Year	Naknek-Kvichak Set Sections			Egegik			Ugashik			Nushagak Set Sections		
	Drift	Naknek	Kvichak	Drift	Set		Drift	Set		Drift	Nushagak	Igushik
2008	81	12	7	85	15		92	8		79	16	5
2009	80	12	9	85	15		87	13		77	20	4
2010	80	10	9	84	16		90	10		77	17	6
2011	83	10	7	84	16		88	12		77	16	7
2012	85	7	8	83	17		89	11		63	27	6
2013	84	9	7	85	15		90	10		78	17	5
2014	83	9	8	89	11		83	17		74	16	7
2015	84	8	8	81	19		91	9		69	22	9
2008-2015 Avg.	83	10	8	85	16		89	11		74	19	6
Regulatory Allocation	84	8	8	86	14		90	10		74	20	6