

PROPOSAL 46 – 5 AAC 06.331. Gillnet specifications and operations. Allow permit stacking for set gillnet operations, as follows:

I apologize that I cannot offer draft language, this is not an existing regulation that needs revising.

I would offer the language used in the time that S04T stacking was allowed. I would ask a restriction that prevented a dual permit holder from fishing both permits on one site.

What is the issue you would like the board to address and why? I ask the Board of Fisheries to approve permit stacking for S04T set net permit holders, so that one individual cannot only own two permits but can also fish two permits. I would prefer to see a tail on that regulation that prohibited a dual permit holder from fishing both permits on one site, say by alternately fishing one net while simultaneously picking another on the shore.

My primary reason for asking for permit stacking is defensive, we need to be able to fish our permits enough to make money and not be driven from the fishery by costs and restrictions.

We live in Homer and set net in Egegik. There are presently seven of us in one family, fishing three sites with three permits. With employment, school, disability, and other time constraints, it is impossible for us to have the same three permit holding persons there for the season from start to finish. Set netting is not a particularly profitable business and a family has to have other primary employment. Primary employment and school schedules drives who can be there and who can't. Although we are capable of fishing three sites for the full season, we cannot have the same three persons as permit holders for the full season. Given transfer restrictions and inefficiency during the season, we cannot transfer at will. Permit stacking allows our family to fish the full season and maximize our investment.

I was reading a report done by CFEC during the last board meeting for the permit stacking proposals. CFEC concluded that permit stacking was utilized by non-locals, like us, and non-residents, but not locals to Bristol Bay and that was presented as a detriment to the locals. I think the conclusion was wrong. A local Bristol Bay family does not need to stack permits because a non-fishing permit holder can more or less legally go down to the beach and hang out while others fish, thus no need to find an active permit holder. A permit holding grandmother can go to the beach near her home, sit in a camp chair, and watch her grandchildren fish her site. That's wonderful, I support that. That family can fish the whole season. But my wife, a permit holding grandmother who loves to watch her grandchildren fish, cannot do that. We have to travel out to Bristol Bay from Homer; she can't go home after the fishing period and take care of other family or employment needs. The grandchildren cannot always come to the Bay in time, they have school, college, sports. In another example, a local permit holder who was, say 17 and a senior in high school could play sports and attend school and fish, because the site was close to home. Our kids cannot do that. If we could stack our permits, we could fish more periods with all our permits and be able to make set netting economically viable.

I was told that permit stacking raised the price of the permits, making them less available locally. We wouldn't know because we don't buy or sell, we only stacked within our family when it was allowed. Among the 8 or so families in our area that did stack when it was allowed, none bought permits. The reason was always the same, family convenience allowing the family group to more

efficiently fish what they already have. I suppose stacking could cause some rise in cost of a permit because it allows more efficiency in set netting and thus more income to a permit holder.

There was a lot of previous opposition to stacking among local Bristol Bay permit holders because it was said that the price of permits would go up. In my view, local people can take advantage of having permit-holding family members nearby, so they don't need stacking. In my view, that is an allocation to locals at the expense of non-local Alaska residents like our family.

In my view, locals will benefit the most of the three groups by permit stacking. It's my understanding BBEDC will finance permits for Watershed residents. That is a wonderful advantage not available to us in Homer. By stacking, locals could in theory double the number of permits owned locally, using financing from BBEDC. I believe the greatest beneficiaries to set net permit stacking are the local residents.

But we all will benefit and we need the help.

Thank you.

PROPOSED BY: Tony Neal

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