Submitted by: Gene J. Sandone, representing BBEDC

RC 35

Permit-Stacking Proposals: Proposals 24, 25, 26, 27

- **Reference:**
  - **PC 6:** BBEDC Comments
  - **AC 02, 03, 05, 06, RC 17: Bristol Bay Area AC Comments**
  - **RC 2: ADF&G Comments**
  - **CFEC Memo to Glenn Haight,** Subject: CFEC on 2018 Bristol Bay Proposals 23-27. and 30. Dated Nov 20, 2018
  - **RC 27:** BBEDC, State, and AC Positions on Proposals
  - **RC XX:** My public testimony

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What are the Current Regulations?

1. 5 AAC 06.331.
   (c) Except as provided in 5 AAC 06.333, a person may not operate or assist in the operation of a drift gillnet exceeding 150 fathoms in length or a set gillnet exceeding 50 fathoms in length.
2. 5 AAC 06.333
   (a) Two Bristol Bay drift gillnet CFEC permit holders may concurrently fish from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear under this section ...

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PROPOSAL 24, 25, 26 and 27 BBEDC Recommendation: OPPOSE

What would these Proposals do?

- Proposal 24, 25, and 26 would allow 1 permit holder who owns 2 CFEC drift gillnet permits to operate 200 fathoms of drift gillnet from 1 vessel.
- Proposal 24 would also allow 1 permit holder who owns 2 CFEC set gillnet permits to operate an unspecified amount of set gillnet gear (more than 50 fathoms)
- Proposal 27 would allow 1 permit holder who owns 2 CFEC set gillnet permits to operate 100 fathoms of gear.

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PROPOSAL 24, 25, 26, 27 BBEDC Recommendation: OPPOSE

- **Erodes the benefits of the "D" configuration, especially to existing crew, "D" permit holders, and new entrants into the fishery.**
- **Changes the "D" config. relationship, raise permit values, create barriers to entry, and eventually result in an undue consolidation of the fleet.**

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STATE COMMENTS

Proposals 24, 25, 26, and 27

ADF&G is NEUTRAL on these proposal.

- The department supports maintaining access to CFEC limited entry permits for new fishery participants.

Proposals 25 and 26:

- This would likely increase permit value and reduce permit availability by an unknown amount.

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State, BBEDC, and AC Positions

Prop. #	Proposal Description	ADF&G	AWT	BBEDC	Nunivak AC	Hooper Bay AC	Naknek-Kvichak AC	Lower Bristol Bay AC	Togiak AC
24	The ability to stack and own 2 permits, fish together on one vessel for Drift Net Fishers and 2 permits for Set Net Fishers. This proposal would permit stacking for both set and drift gillnetting. It would allow for the operation of more, but an unspecified amount, of gear currently allowed for one permit holder who owns more than one set or drift gillnet CFEC permit.	NEUTRAL		OPPOSE	FAILED unanimously	FAILED unanimously	FAILED 3-6	NO ACTION	NO ACTION

State, BBEDC, and AC Positions

		POSITION							
Prop. #	Proposal Description	ADF&G	AWT	BBEDC	Nunivak AC	Hooper Bay AC	Naknek-Kvichak AC	Lower Bristol Bay AC	Togiak AC
	Permit Stacking								
25	Adopt and allow one person owning two permits the extra compliment of drift gillnet gear up the 50 fathoms, equaling a total of 200 fathoms per vessel.	NEUTRAL		OPPOSE	FAILED unanimously	FAILED unanimously	FAILED 3-6	FAILED unanimously	NO ACTION
26	Allow the owner of two drift gillnet limited entry permits to operate 200 fathoms of drift gillnet gear from a single vessel	NEUTRAL		OPPOSE	FAILED unanimously	FAILED unanimously	FAILED 3-6	FAILED unanimously	NO ACTION

State, BBEDC, and AC Positions

		POSITION							
Prop. #	Proposal Description	ADF&G	AWT	BBEDC	Nunivak AC	Hooper Bay AC	Naknek-Kvichak AC	Lower Bristol Bay AC	Togiak AC
	Permit Stacking								
27	Allow the holder of two set gillnet limited entry permits in the Naknek-Kvichak, Egegik, and Ugashik districts to operate 100 fathoms of set gillnet gear.	NEUTRAL		OPPOSE	FAILED unanimously	FAILED unanimously	FAILED 3-6	FAILED (5-5, 1 neutral)	NO ACTION

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PROPOSAL 24, 25, 26, 27
CFEC COMMENTS

- ***Proposals 24 through 27**...Each proposal has the potential to increase individual or fleet harvest capacity, which is contrary to the original purpose of allowance of dual permits to reduce fishing effort.*
- *Alaska's limited entry system is an '**input control**' program...If permit holders are allowed to gain fishing capacity after the fishery is limited the intent of program is undermined and it can become ineffective.*
- *...tends to favor individuals who have easier access to financial capital,...*
- *...might make it more difficult for younger fishermen to enter the fishery or could result in additional permit migration away from Bristol Bay communities.*

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PROPOSAL 24, 25, 26, 27
CFEC COMMENTS

- ***Proposals 24, 25, 26, 27 and 30 could increase harvest capacity for both select individuals and the Bristol Bay fleet overall, which could add unanticipated complexity to fisheries management and impinge on the integrity of existing efforts to limit effort. Therefore, the Commission cannot support these proposals as written.***

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PROPOSAL 24, 25, 26, 27
Conclusion

- **Based on the overwhelming opposition to these proposals by BBEDC, the Advisory Committees, CFEC, and the public, BBEDC requests that the Alaska Board of Fisheries vote NO on all these proposals.**

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