

Attn: BOF Record Copy (RC)
Boards Support Section
Alaska Department of Fish and Game
Box 115526
Eagle River, AK 99811-5526

RC 37

Re: RC Comments Proposals 44 through 53

Dear Chairman Johnstone, Members of the Board,

I am providing you these written comments supporting proposals 44 through 53 repealing the setnet permit stacking sunset provision. I would like to see setnet permit stacking remain in place in Bristol Bay for at least the next 3 years and preferably permanently.

My wife and I are lifelong Alaska residents and own and run a family setnet operation in Nushagak and have done so since 1992. Before that I worked as a deckhand for my father, starting in 1984. Our operation consists of four permits and sites that we have purchased over the years, two of which are currently in my name. Because my wife doesn't go out in the boat and my kids are not old enough yet to have permits in their names, I have been forced to put my other permits in deckhand's names. This is risky, and ideally I would like to have two in my name, and two in my son's name (when he is old enough).

The main benefit that setnet permit stacking provides in Bristol Bay is that it allows operations to expand and become more viable while not exposing owners to the risk of putting permits in crewmembers names. Single permit operations have a tough time making it any more, one poor year is enough to cause an operation to fail. Many fishermen are not willing to take the risk of committing themselves financially to purchasing another permit, and then also being forced to put it in someone else's name. Financing may be harder to obtain in some cases if the new permit must go in someone else name other than the owner of the operation. I would argue that permit stacking has worked well the past three years and that the majority of setnetters are in favor of it. Those opposed are mainly drift fisherman, and those not wanting to see setnet operations expand.

I would encourage the Board to consider eliminating the sunset clause and making setnet permit stacking in Bristol Bay a permanent regulation. In my opinion the positive benefits far outweigh the negative ones.

Sincerely,

Tom J. Rollman
Eagle River, AK