RC 183

February 6, 2014

Chairman Johnstone and members of the Board,

I'd like to offer some new perspective on why I oppose Proposal 126, the initiative prohibiting the practice of permit-stacking in both the set and drift gillnet fisheries.

First, I've yet to hear any compelling evidence that these so-called "latent" permits truly are being bought in quantity and reactivated. I suspect that the threat of an of organized movement of zombie permits is purely rhetorical and exists mainly in the minds of the authors of this proposal.

Much more importantly, as the representatives of KRSA have said, this is a fully-allocated resource. I would argue that the fishery is fully allocated for the number of permits that have been issued by the state, and not for the number of permits that might be in use at any given moment. As a hypothetical illustration, if my sites were to stop fishing for a year and later resume operation, the overall commercial allocation would not shrink in my absence and be exceeded upon my return. Exploiting this idea of permit latency seems to me a weak pretext for an effective reduction of the commercial allocation of the sockeye run. The set and drift gillnet permits, unlike the in-river fisheries of the Kenai, have been under limited entry for decades; the representatives of KRSA can have no real fear of an uncontrolled increase in commercial users.

As a practical sidenote, it follows logically that many who sell their permits would do so after a year or more of disuse. This should not constitute a reallocation, and I can see no honest justification for preventing it, whether permit-stacking is permitted or not.

Thank you for your time and effort,

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