

BBEDC Comments on Proposals 44-54

Some of the discussion surrounding repealing the sunset clause for dual set gillnet permits for a single individual (Proposals 44-54) causes concern for the Bristol Bay Economic Development Corporation.

As stated previously, we oppose repealing the sunset clause because of our fear, confirmed by CFEC Report No. 12-02-N, that allowing two setnet permit operations would reduce opportunities for new entrants to the fishery by increasing the market price of setnet permits while reducing their availability.

The three-year-trial Kodiak dual setnet experiment seems to have produced similar results, and although the decision to allow that regulation to sunset was a difficult one, the Board acknowledged the longer-term benefits to the Kodiak fishing community.

Suggestions that a fair compromise for Bristol Bay might be to create different rules for the Bay's east and west sides (Naknek, Egegik and Ugashik vs. the Nushagak) would not prevent permit prices from rising, nor would it make the permits more readily available. It would however create a third class of permit holder on the Nushagak, setnet fishers with the option of owning but not fishing a second permit of ever increasing value.

Testimony offered to the committee of the whole described how one two-permit operation can be significantly more productive than two one-permit operations by running what amounts to "two shifts" during open fishing periods. But current regulations already allow for those benefits for family members and fishing partners who make use of shared equipment, skiffs and trucks at one or more sites, and many setnet fishers already benefit from such cooperative arrangements.

The difference is that voluntary cooperative operations maintain broad participation and permit ownership, in contrast to continuing the one-person two-permit rule where consolidation will continue to increase costs and reduce opportunity for new entrants.

Exclusivity was never the goal of the limited entry system. We urge the Board to allow Bristol Bay's one-person two-permit experiment to sunset as the regulations now require.

Fritz Johnson for BBEDC