

R.C. 94

My name is Kevin McCambly, I was out in Naknek at the board of fish meeting and feel that you got it right the first time around. There was a great effort made to be considerate and sympathetic towards those on both sides of proposal 250. Fishing regulations should not be tailor

However:

I have not heard of any new information presented to merit reconsideration of dual set net permit stacking 'anywhere' in Bristol Bay. I worry this proposal is a ploy in order to revisit implementation of permit stacking in all districts of Bristol Bay. I remember hearing two board members mentioning that it did not seem plausible to allow an east vs west side split when deciding that permit "stacking" was to sunset back in December. State fishing regulations should not be tailor-made to benefit those who have openly admitted to skating around the letter of the law.

Dual permit ownership is not a customary practice in Bristol Bay, people managed just fine before stacking was permitted in '09 and will continue to do so moving forward. A permit means singular ownership, you do not get two driver's licenses. Allowing individuals with the means to buy a second permit (sounds like a purchased quota to me).

What once was the primary source of income for four families, or four different permit holders is now consolidated to benefit just one. Between a husband and wife with the capital to purchase up to four permits, holding eight separate sites creates a major disparity within a single gear type. During times when the processors implement daily limits, that family then has the chance to deliver up to four times the daily limit of single permit holding families. After putting all poundage caught onto one permit, they now stand a greater chance to receive production incentive bonuses; this encourages a shift in focus to production rather than continuing to improve quality.

Stacking creates separate socio-economic classes. It is necessary at times that the state be used as a safeguard against domestic faction. By a faction, I understand a number of citizens, whether amounting to a majority or minority of the whole, who are united and actuated by some common impulse of interest, adverse to the rights of other citizens, or to permanent and aggregate interests of the community. This decision should not be made based off of a clash of interests but more so to achieve justice and the general good. Consolidation of permits into the hands of a few allows those with dual permits to hold more sway, they will be catching more fish and being paid better prices for a lower quality product. Dual permit holders will view themselves as a superior or favorable (noble) class. Those with one permit will be left with feeling as a second class fisherman. Proposal 250 is a degradation to our country's republican form of government.

***No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State.**

***The board shall provide a fair and reasonable opportunity for the taking of fishery resources by commercial fishermen.**

***The importance of each fishery to the economy of the state; the economy of the region and local area in which the fishery is located**

I ask that you review the board operating procedures passed in October of 2012 and determine whether or not this proposal follows suit.

*****those who value of the permit more than fair market value will choose not to sell. The fair market value of permits will increase when there are more individuals willing to purchase additional permits than there are available at the current price. the price of a Bristol Bay set net permit went from \$26,700 in August of 2008 to \$40,900 in August of 2012. The CFEC report indicates that permit stacking increased the value of a permit by \$14,685. 2012 in general was not a great harvest for most fisherman so that price does not directly reflect net profit for that year regardless of the rebounding fish prices. On the other side of that argument is that fish prices are the reason permit prices have gone up, in that instance permit holders should be able to get a fair price on their investment as prices should hold if not climb next year. If no action is taken on this proposal people would not be forced to sell their second permit, they simply would not be able to fish it.**

Under Alaska's constitutional authority, I believe this proposal would go against Article 8-Natural Resources guidelines in regards to General Authority — The legislature shall provide for the utilization, development, and conservation of all natural resources belonging to the state, including land and waters, for the maximum benefit of the people.

Common Use — Wherever occurring in their natural state, fish, wildlife, and waters are reserved to the people for common use.

No Exclusive Right of Fishery [as amended in 1972 to allow limited entry] — No exclusive right or special privilege of fishery shall be created or authorized in the natural waters of the State. This section does not restrict the power of the State to limit entry into any fishery for purposes to prevent economic distress among fishermen and those dependent upon them for a livelihood..

+The Alaska Department of Fish and Game was created as a cabinet level department run by a commissioner, who answers directly to the governor. The functions of the commissioner are to: manage, protect, maintain, improve, and extend the fish, game, and aquatic plant resources of the state in the interest of the economy and general well-being of the state.+

+The board uses the biological and socioeconomic information provided in part, by the public comment received from people of the state.+

*did the board ever establish what constitutes a significant or insignificant benefit?

Ken J. McCarty