

November 30, 2022

To the chairman and the board of fish

I previously submitted PC 48 but wanted to add to my comments specifically regarding permit stacking and D permits. I think it needs to be made clear that one person fishing two permits in no way takes away the ability of two persons fishing one permit each to combine on a single boat. Young (or old) participants in the fishery can still step on boats as a combination crewmember/permit holder and work their way towards a boat of their own. Under Alaska law one person can already own two permits so it seems a logical step that they could take advantage of and use both permits. Under the current system permit owners not participating in the fishery are making money by leasing their permits. A boat captain that doesn't have access to a family member or trustworthy crewmember is forced to go the lease route if he wants to fish as a D boat. If that captain was able to fish two permits himself instead of leasing he could put that money toward a second permit of his own and have something to show for it once his loan is paid for.

Many people seem to think that permit stacking will increase the cost of permits and limit the availability. I don't know where that thought comes from as I am not aware of any studies that have been done. Over quite a few years Bristol Bay has settled out at about 400 D permits and I don't think that will drastically change with permit stacking. What will change is the constant moving of leased permits will get cleaned up and solidified. It is the overall viability of the fishery that has the greatest influence on permit price. We are at a high point now with record runs in Bristol Bay, but things change and history says we will have small runs again in the future. For the coming season we are already looking at a potential harvest of about 60% of this most recent summer. Besides my 27 years as a drift permit holder in Bristol Bay I have 33 years in the Bering Sea crab fishery. Four years ago we thought we were on the way to huge increases in the snow crab fishery based on survey results and now we have nothing. If and when fish runs decrease in Bristol Bay in future years it will be nice to have less boats on the water.

Permit stacking helps all participants in Bristol Bay by removing boats and gear from the fishery.

Thank you

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Bainbridge Island, WA

Permit # S03T 61133