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Alaska Board of Fisheries
PO Box 115526
Juneau, AK 99811-5526

RC 006

Dear Members:

I write today in **SUPPORT of PROPOSALS 45, 46, 48, and 50** to allow two setnet permits in Bristol Bay to be owned and operated by the same individual.

When the regulation authorizing setnet permits to be stacked and fished was allowed to sunset in December 2012, despite widespread support for the proposals—particularly on Bristol Bay's east side—a number of assumptions were discussed, particularly those about permit price increases solely due to stacking and creating barriers to entry into the fishery. What was not thoroughly discussed and understood by the board in 2012, in my opinion, is that fact that most of those that would—and did—utilize permit stacking were multi-generational family fishing operations. These permit holders aren't interested in selling their permits no matter how high the price goes or the extent to which they are forced to transfer permits to crew members in order to maintain the economic viability of their operations when college, health, age, careers, etc. may preclude all permit-holding family members from being available to fish all of every season.

A number of factors influence any decision a fisherman makes, but amongst the setnetters with whom I've associated over my 40 years' involvement in the Bristol Bay salmon fishery, a primary factor in how their operations are run is that of making decisions that allow extended families to work together in order to share important family values such as instilling a strong work ethic, development of critical thinking skills, and spending time together as a family across multiple generations doing something they love. Because for most, setnetting isn't a high-income fishery, many have invested in more than one permit in order to improve the economic viability of their fishing operations so they are able to continue this "lifestyle" fishery. While some will mock the value and validity of a lifestyle fishery (compared to one prosecuted solely for economic gain), many will also attest to the important role that such a fishery has played in their families' lives and wellbeing, while contributing to the family coffers.

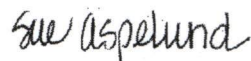
One thing that confuses me—and perhaps one that the board would be willing to ponder—is why residents of the west side of the Bay and Bristol Bay Economic Development Corporation are so opposed to permit stacking. That most watershed residents have access to BBEDC-subsidized fisheries loans and programs seems to represent a potential opportunity for watershed residents to improve their fisheries access through permit stacking. An existing permit holder already has the necessary fisheries infrastructure, and so, for only the cost of an additional permit, can increase his/her fisheries income and provide stable jobs for watershed

crew. Since jobs on setnet sites are often easier to come by than the more lucrative drift crew positions, the setnet fishery can be viewed as the ultimate entry-level fishery for crewmen looking to launch into the drift fishery, having provided important necessary experience and income. Watershed residents could have a great opportunity to provide both if willing to look beyond what appears to be a "we don't want anyone to have any more opportunity than me" mindset amongst some, particularly given that a majority of the permits desiring to be stacked already exist in family operations and aren't going to be sold outside of those operations in any event. The concept of "consolidating wealth" presented by those opposed to permit stacking is a myth; economic survival is a much more realistic description of what stacking enables for most setnet operations, particularly in the current market climate.

I am heartened by the fact that the 2015 CFEC stacking report is more realistic than the 2012 report was about latency data and the fact that there are a number of reasons that a permit may appear to be latent, but actually isn't. The board should use caution when using latency as a rationale for opposing permit stacking as a result.

I encourage the board to listen carefully to the arguments presented to it on the setnet stacking proposals. As it did in 2012, the board will hear pleas from honest fishermen trying to keep family operations intact and viably, freed from the risk and expense of needing to put permits in crewmembers' names and hoping that they are returned. Some are asserting an esoteric barrier to entry concept as a reason to oppose enabling family operations to operate efficiently without putting their families' heritage at risk through transfers to those outside of their families. However, the real barrier created is an artificial one by those who lack understanding about how most setnet operations are run and why. If fishermen on the west side of the Bay don't want permit stacking, please allow them to opt out by district as Proposal 50 suggests, but please don't penalize eastside fishermen who invested in multiple permits years ago in order to pass them down through future generations, who sincerely value the life that fishing and working together as a family provides, and who would appreciate being able to do so as economically feasibly as possible.

Sincerely,



Sue Aspelund

4th generation eastside setnetter's mom and grandmother of potential 5th generation setnetter