

*Alaska State Legislature*  
 REPRESENTATIVE BRYCE EDGMON

SPEAKER OF THE HOUSE

*House District 37*



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

November 20, 2018

To the Members of the Alaska Board of Fisheries,

Once again, the board's meeting cycle turns to Bristol Bay finfish, and once again, issues before the board include ill-advised proposals to increase the maximum length for drift gillnet vessels and to allow a single vessel owner in possession of two permits to fish an additional complement of gear. I am writing on behalf of the Bristol Bay resident salmon fishers I represent to urge the board to reject these proposals and the adverse consequences they invite.

The fish and game advisory committees across the Bristol Bay region are overwhelmingly opposed to permit stacking. Their position is well justified.

Current regulations allow the fishing of additional gear from a single vessel on which two permit holders are present, and this serves a worthwhile purpose, in that it promotes a degree of fleet consolidation while also providing a means of entry into the fishery with a lower initial capital outlay for new permit holders. However, allowing a single owner of two permits to fish additional gear creates detrimental impacts that greatly outweigh any benefits.

A 2012 study on Bristol Bay set gillnet permit stacking by the Commercial Fishing Entry Commission concluded that the regulatory experiment authorized by the board for three seasons beginning in 2010 dramatically increased the costs of entry permits; increased use of latent permits; led to an historically low participation rate for new entrants, and broadly disadvantaged local fishers, who have less access to capital.

During the period when set gillnet permit stacking was allowed, the cost of those permits increased by more than 64 percent. Over the same span of time, the price of a drift gillnet permit—for which stacking was not authorized—saw only a 16.5 percent increase. The number of dual permit holders among local fishermen dropped, while dual permit holders among nonlocal and nonresident fishermen soared. Skippers with single permits landed fewer fish, while dual permit skippers saw substantially increased landings. The average income of dual permit holders was more than double the average of skippers fishing single permits.

State Capitol Building

120 East 4th Street, Juneau, AK 99801

Phone: 907 465 4451 Toll Free: 800 898 4451 Fax: 907 465 3445

Rep.Bryce.Edgmon@akleg.gov

ak  
 .kutan  
 Aleknagik  
 Anvik  
 Atka  
 Attu Station  
 Chignik  
 Chignik Lagoon  
 Chignik Lake  
 Clark's Point  
 Cold Bay  
 Dillingham  
 Egegik  
 Ekwok  
 False Pass  
 Flat  
 Grayling  
 Holy Cross  
 Igiugig  
 Iliamna  
 Ivanof Bay  
 King Cove  
 King Salmon  
 Kokhanok  
 Koliganek  
 Lake Minchumina  
 Levelock  
 ie Village  
 .anokotak  
 McGrath  
 Naknek  
 Nelson Lagoon  
 New Stuyahok  
 Newhalen  
 Nikolai  
 Nikolski  
 Nondalton  
 Pedro Bay  
 Perryville  
 Pilot Point  
 Pope-Vannoy  
 Port Alsworth  
 Port Heiden  
 Portage Creek  
 Red Devil  
 Sand Point  
 Shageluk  
 Sleetmute  
 South Naknek  
 St. George  
 St. Paul  
 Stony River  
 Takotna  
 Togiak  
 in Hills  
 ashik  
 Unalaska

While permit stacking may have fewer negative impacts in other regions of the state, clearly in the Bristol Bay fisheries the practice disadvantages local fishermen and their communities. Cumulatively, single-owner permit stacking's impacts would accelerate the out-migration of locally held Bristol Bay entry permits, a problem that has undermined the economies of the region's communities for decades.

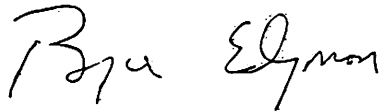
As the board well knows, to allow for limited entry a state constitutional amendment was passed in 1972. It gave the state the authority to "...limit entry into any fishery for purposes of resource conservation, to prevent economic distress among fishermen and those dependent upon them for a livelihood, and to promote the efficient development of aquaculture in the State."

Most significant here in terms of the permit stacking issue is preventing "economic distress among fishermen and those dependent on them for a livelihood." This passage has commonly been interpreted to include the general economic wellbeing of fishery-dependent Alaska coastal communities. The detriment to local fishermen, their families, and their communities that permit stacking in Bristol Bay fisheries would create is contrary to the purposes of limited entry, as described in the State Constitution.

Many of the same issues come into play regarding proposals to increase the maximum drift gillnet boat length. Such a step would set off another "arms race" of over-capitalization in the Bay, leading to severe disadvantages for local fishermen with limited access to capital and exacerbating the financing challenges confronting new entrants into the fishery.

I strongly encourage the members of the Board of Fisheries to reject all proposals that allow for increased boat length and that authorize single-owner permit stacking for the Bristol Bay salmon fisheries.

Sincerely,

A handwritten signature in black ink that reads "Bryce Edgmon". The signature is written in a cursive, slightly slanted style.

Representative Bryce Edgmon