## **PROPOSAL 75**

## 5 AAC 06.333. Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay.

Allow permit stacking in the Bristol Bay commercial salmon drift gillnet fishery, as follows:

5 AAC 06.333. Amendment Requirements and specifications for use of 200 fathoms of drift gillnet in Bristol Bay. Allow one person holding two drift gillnet limited entry permits to operate up to 200 fathoms of drift gillnet gear in Bristol Bay.

Adopt and allow "Permit stacking" one person owning two permits to operate both permits in the same way two separate Bristol Bay drift gillnet CFEC permit holders can under 5 AAC 06.333

What is the issue you would like the board to address and why? 5 AAC 06.333, allows "dual permit vessels" for two separate permit holders. I recommend the Alaska Board of Fisheries amend the current regulation to include "Permit stacking" allowing one person owning two pem1its to operate both permits in the same way two separate Bristol Bay drift gillnet CFEC pe1mit holders can under 5 AAC 06.333

The Board's authority to allow permit-stacking is set out in AS 16.05.25 I (i), which was enacted in 2006 as House Bill 251 (HB 251)

Allowing one person to operate two pelmits has many direct benefits.

It will allow the fishery to get closer to fully realizing the optimum number of drift vessels/permits. This will benefit both drift and set net permit holders, by the reduction of one vessel, and I 00 fathoms of fishing gear for every vessel that becomes a dual. Due to the exponentially increased costs for operating a vessel that we have seen, coupled with the low ex-vessel prices this is more essential than ever.

Allowing captains to purchase a second permit allows them to invest in their business and saves them the unpredictable expense of a lease that is a lost cost. It will also decrease the demand for emergency transfer permits allowing for the lease costs to be more affordable for fisherman staring out.

It will help the fishelman who may have to choose between loss of income or family obligations. For example, husbands and wife, who both have permits, currently have to decide between losing part of their income and one of their permits if they want to have children or to find a family member to watch their children while fishing so they do no lose part of the income. With the cost of living right now most people cannot afford to lose income, or may not have someone they can trust to watch their children for that long.

The captain operating the vessel and holding both permits will be fully responsible for operating in a lawful manner. Unlike currently regulations where the second permit holder, who may not have the same control as the captain, is held just as responsible.

The main argument in past years against both the current dual permit vessels. Along with the proposed single owner, dual permits. Has been; that it could be a factor in increasing the cost of permits, therefore possibly reducing the number of new fishermen entering the fishery. The new entrant's data from CFEC actually shows the opposite to be true. Bristol Bay Has experienced a higher rate of new entries after dual permit were allowed in 2004 when compared to prior years as well as other drift gillnet fishery around the state. The only thing that Has proven over time to reliably reduce the value of permits. has been the reduction of profitability of the fishery as a whole. I don't believe any stakeholder in the fisheries sees that as an ideal goal.

Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.