

## **PROPOSAL 78**

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

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

A single person may hold two Bristol bay drift permits (S30T) and fish both of those permits on a single vessel. Allowing them 200 fathoms without a second person holding a permit on the vessel.

The permit holder of both permits would only be assessed 3 points in total for the first violation of “Fishing in closed waters”, “Fishing during closed season or period”, Fishing with gear not allowed in fishery”, “Fishing before expiration of transfer period”, "Fishing with under length or over length vessel”. If another violation occurs in the 3 year probationary period the second offense would be 6 points. Giving the permit holder a total of 9 points. Essentially treating the owner of both permits as one person which they are regarding demerit points.

**What is the issue you would like the board to address and why?** I would like to address the issue of the Dual permit or “D” permit in the Bristol Bay drift fishery. I believe if you can legally fish two permits aboard one vessel then you should be able to own and fish both permits. The fishery has changed dramatically since fishing a D became allowed in 2004. The capabilities of the fleet have changed as well as the global market for our fish. We now have fewer processors set up to buy for 2025 than I’ve seen in my 17 year Bristol Bay career both as a crewman and vessel owner/operator. With accounting for inflation we’ve had record low ground prices recently. Stacking permits have been beneficial for putting less net in the water and allowing fishermen to have less boats to deal with on the grounds which are already crowded as it is. This helps everyone in the fleet make more money. Crewmen benefit from this as well by making more money and giving them more opportunity to invest into the fishery if they’d like. In 2024 there were around 1200 vessels fishing most of the season with 441 registered D boats. Every D boat helps the rest of the fleet by taking 600 feet of net out of the water and a vessel. In 2023 according to the state and a recent National Fisherman article the average vessel grossed \$105,030. I believe it was similar for 2024 as well. The final numbers haven’t been released but the fishery was only up from 117 million in 2023 to 128 million dollars in 2024. This is not much money when you look at the current cost of insurance, fuel, nets, parts, upgrades, and RSW systems people invest in every season just to go fishing. The D allows the potential for more profit for everyone.

An argument against stacking is it could make it harder for people to buy into the fishery. I don’t believe this is true. Many people can’t afford to buy a second permit and will still need to hire a permit holder to be their D or will medically lease their dual permit. Also allowing permit stacking would allow families to keep permits in the family. This could benefit everyone from local watershed residents to people who currently shuffle a D permit around. There is plenty of access to the fishery currently. Used boat prices are at an all time low, and you can buy a great boat for cheaper than you could over the last 7 years. I feel many people who want to buy a permit and be a dual permit holder before buying their own boat won’t be affected much by this change to the current regulation. Another problem I’ve seen is deckhands with medically transferred permits in their name receive CFEC points for a ticket due to the operator. If they were to buy a permit for the next season now they have points against their name for something they didn’t do. Essentially punishing the dual permit holder making it harder for them to individually succeed later on. There

will still be a demand for permit holders looking to secure a spot as a “D” for the season. It is common practice to lease a permit and take that money out of the overall gross, which affects crew so they make less off the D then if the owner could own both permits.

There was a CFEC optimal vessel study done saying the optimum number of boats to fish Bristol Bay is 800-1200 vessels. I feel making it possible to own and fish two permits could keep the fishery healthy and sustainable and within that optimal range.

With over 1800 permits in existence even if every boat was a “D” boat you would still have 900 plus boats and I don’t see that happening. As far as tickets and points go with the cfec a dual permit holder would only receive a total of 3 points for their first offense total for both permits. With an additional 6 points to their name upon a second violation within the 3 year probationary period. It seems if you accessed 3 points per permit for a first offense all of the sudden if they made a second mistake they’d be suspended from the fishery which seems harsh. An example would be if someone got web in the wheel and got ebbed out over a line and got their net back late they would only receive a total of 9 points. Not 18 points. For both offenses.

**Did you develop your proposal in coordination with others, or with your local Fish and Game Advisory Committee? Explain.** I’ve spoke with many peers who are for stacking. Clearing up space on the fishing grounds and giving everyone more space.

**PROPOSED BY:** Hayden Hinschied

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