

Written comment proposal #51

Written By AIFMA President David Harsila

AIFMA's membership is in favor of proposal #51. 80% in favor.

If the proposal is adopted what would happen?

- 1 Fisherman that have invested in a second permit held in a crewman's name will no longer risk a total loss should the crewman sell the permit.
- 2 Fisherman that can afford to own two permits have bought them under the current dual permit regulation already. The increase in permit ownership under proposal #51 will happen slowly over time.
- 3 The economic incentive to own two permits is to remove 100 fathoms of gear from the fishery. The additional 50 fathoms of gear does not justify the cost of a second permit.
- 4 After the initial surge, there has been a decline of dual permit operations in Bristol Bay since 2004 when the current dual permit regulation was put in place. Unless permit stacking is approved, we will continue to lose dual permit operations, increasing the amount of drift gear in the water and devaluing our fishery even further.

Thank you for your time and consideration