

Native Village of South Naknek, P.O. Box 70029, South Naknek,
AK 99670

December 4, 2015

Chairman Tom Kluberton, Alaska Board of Fisheries

The Native Village of South Naknek is opposed to setnet Permit Stacking, Proposals 45-50, drift net permit stacking, Proposal 51 and 52, along with any increase in amount of gear used by drift fishermen under Dual Operation regulations, Proposals 53. We are also against the formation of the Graveyard Creek Special Harvest Area, which Proposal 60 seeks. These proposals are ruining our fisheries.

A publication by CFEC in 2012 entitled, *Bristol Bay Set Gillnet Permit Stacking*, concluded: that:

1. Permit stacking nonlocals and nonresidents have a higher rate of participation than locals;
2. Permit stacking brings permits out of latency, thus increasing the number of permits used;
3. Stacked permits operations reallocate harvests;
4. The number of new entrants into the set gillnet fishery has declined; and
5. The estimated value for the set net permit has significantly increased as a result of permit stacking.

All of these conclusions harm the local watershed fisherman.

Additionally, a more recent publication by CFEC, CFEC Report Number 15-4N: November 2014, indicates that a person who fished two set net permits under permit stacking regulations, during the period 2010-2012, made, on the average, more than 2 times as much as individual who fishes only one set net permit. We believe that allowing permit stacking for drift fishermen would cause more harm to the local fishermen than even set net permit stacking caused or will cause. Catching more fish with the second permit or the addition of additional gear under Dual Operations will be taking those fish from other fishermen. All of these proposals are based on GREED and will harm the local watershed fisherman. We also believe that people who can buy a second permit and fish that permit are those with more capital than all the fishermen who live in our small village. Our local people are now considering selling their fishing permits just to survive. How can we buy a second permit to compete with those who can? We cannot compete with the large boats and additional amounts of gear. This competition will drive us deeper into poverty.

Therefore, we ask you to oppose all permit stacking proposals, those proposals which allow more gear under Dual Operations regulations, and those proposals that seek special attention through Special Harvest Areas.

Sincerely,



Donald F. Nielsen, President