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I oppose drift gill-net permit stack proposal 51-52-53

Permit stacking goes totally against the sustainable management plan for economic reasons and for historical reasons.

Economic reasons---

--- Double permit holders get greater catch limits from processors when boats are put on limits. The limit goes to the vessel, so the fisher with one permit on his vessel gets less to catch. In turn this leads to economic loss in the form of less price due to production bonuses. Fishers with one permit are at a distinct economic disadvantage with less price and less catch ability. Fishers who had equal opportunity with all boats having the same amount of gear are now at an economic loss, forcing them to go forward and invest in another permit to gain bigger catch limits and to try to get production bonuses.

--- Bristol Bay Burroughs are having economic losses for they do not receive tax on production bonuses, the system is pushing fishers into over capitalization and local families within the boroughs will be pushed out of the fishery.

Historical catch

--- Fishery is becoming more line concentrated with permit stacking. Double permits with 200 fathoms fish more effectively in clear waters and fishers use extra net as a blocking tool in heavy line fishing situations pushing others away with more net using a hook blocking formation when deploying net. A fisher with 200 fathoms has a distinct advantage when deploying the net in front of a single permit 150 fathoms. The arguments of taking 100 fathoms of gear out of the water and causing less conflict are not true. The fisher with the 200 fathoms has moved to the line into more conflict. Bigger, faster, more net, I have more than you is the attitude here.

--- Clear water fishing with the 200 fathoms has changed dynamics of the fishery, moving catches to areas next to lines and off traditional beaches and upper district areas. These items were never looked at when double permit laws went into effect, it has changed the competition level in an all ready very competitive fishery.

Optimum Number Study--- this study was done with the idea that ex-vessel prices will be at or below 60 cents. This doesn't ever come up when people look at this issue. We need more not less fisherman, we need a higher price not less boats to become economically viable. Catching more fish to make up for low ex-vessel price does not work.

I went through permit stacking in the San Francisco herring fishery and all it did was have us eliminate boats, catch the same amount of fish and everyone stacked permits only prolonging our having to deal with the real issue, the price. We eliminated jobs and looking back 20 years didn't benefit our fishery. The economics would have controlled the numbers of boats as is the case in Bristol Bay. The less boat argument and though's pushing this are out for there own greed and not the betterment of the fishery. Vote no please and go to historical, 1boat, 1permit.