

**PROPOSAL 27**

**5 AAC 06.331. Gillnet specifications and operations.**

Allow the holder of two set gillnet limited entry permits in the Naknek-Kvichak, Egegik, and Ugashik districts to operate 100 fathoms of set gillnet gear, as follows:

5 AAC 06.331 (U). Gillnet specifications and operations.

(U) In the Naknek-Kvichak, Egegik, and Ugashik districts, a CFEC permit holder who holds two Bristol Bay set gill net permits may stack those permits and operate additional set net gear as described in this subsection. The CFEC permit holder may not operate more than four set gillnets. A single set gillnet may not exceed 50 fathoms in length, and the aggregate length of the set gillnets operated by the CFEC permit holder may not exceed 100 fathoms. The buoys must be marked as specified in 5 AAC 06.334 and 5 AAC 39.280 with both of the CFEC permit holders' five-digit permit numbers followed by the letter "S." All identifiers must be displayed in a manner that is plainly visible, unobscured, and in a color that contrasts with the background.

**What is the issue you would like the board to address and why?** Setnet operations in the Naknek-Kvichak, Egegik and Ugashik districts are predominantly multigenerational family operations. Over time, in order to maintain economic viability, two or more permits have been purchased and operated in these operations. Over time, as parents age and aren't consistently physically able to work the sites every year or as children grow up and need to miss a summer due to college, one or more permit holders may be unable to fish every season. The ability to stack setnet permits would enable these longtime family fishing operations to maintain economic sustainability and remove the risk and expense of potentially losing the permit by transfer outside of the family to a crew member. For the most part, these permits are not going to be sold outside of the family operation because their value to these families is in the ability to pass them along to the next generation and not in their resale value. There isn't a legitimate justification for disallowing the stacked use of permits in a family operation since disallowing them isn't going to result in more permits being available for purchase in the public marketplace. Or by allowing stacking the permits value would raise significantly-that didn't happen. And now as stacking is permitted by only the one user group. After researching why the West side of the bay doesn't like set gillnet stacking-it sounds like one person has abused the situation-one person.

**PROPOSED BY:** Eddie Clark

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