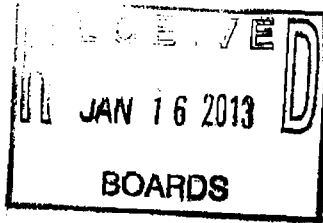


Paul (Tony) Neal III

P.O. Box 3368
Homer, AK 99603-3368
(907) 299-2351
tonyneal@popsiefishco.com



14Jan13

Alaska Department of Fish and Game
Boards Support Section
P.O. Box 115526
Juneau, AK 99811-5526

Alaska Peninsula Meeting, 26Feb

Proposal #250, dual set net permits allowed, Egegik and Ugashik,

Dear Board of Fish,

I am a dual permit holder in Egegik: SO4T 60377W and 60274L. I was one of the proposers at the Bristol Bay meeting for retention of the dual permits for set netters. I was totally surprised that there was any opposition to that proposal and that the Board voted to sunset the regulation.

Owning a single set net site and permit with equipment is barely financially viable. I'm sure that's why there are so many family combines set netting. But even with families, it isn't financially viable to have a bunch of permit holders hanging on the hook taking turns fishing 500 pounds a day at scratch fishing. But, scratch fishing makes a season and helps the processors spread out their catch. This results in better quality and more income for families and processors. The dual permits have allowed fewer fishers to use their equipment and time efficiently to work the early and late seasons and finally make some money set netting. This has been very valuable to our family and our neighbors in the Egegik District.

I researched what I understand is the opposition to dual permits. I believe there was no opposition from east side fishers. It appears to me that the opposition has a flavor of personal self-interest that is not in line with the mission and goals of the Board of Fish.

I located the CFEC report that apparently was done for the Board. I object to the lateness of publication. It would seem that worked to prevent opposition to the report being heard at the Meeting. The author, CFEC's Mr. Gho, used statistical analysis to make conclusions I believe are flawed. I would say that a statistician

from Juneau is not necessarily qualified to make expert opinions on the nuances of permits and local fishing without outside input from fishers and processors in the areas. That report should have been tested before being published.

The CFEC report seemed to conclude that set net permits went up in value as a result of dual permits. We say that is an erroneous conclusion. The report appears to use a comparison with drift permit values, but the author is required to assume (in error) that drift permit values and set net values track the same. They don't. Fuel costs, forecasts up and down in various districts, processor payments, and other factors affect drift permits. It is our conclusion that set net permit values were not affected by dual permits. From our observation, dual permits came from family consolidation, not from purchasing new permits.

Likewise, the report seems to observe "latent" permits came back into use and that was somehow bad and the fault of dual set net permits. In our view, a "latent" permit holder earned and owned that permit and any change in regulations that allowed that person to use their permit is a good one. In our view, the fact that "latent" permits were used points to the fact that the dual permit regulation was good for Bristol Bay and its fishers, and that would be all fishers, not a select few with personal self-interest.

We believe dual permits are a good thing for Bay fishers, processors, labor work force, locals, non-locals, and non-residents alike.

Certainly the dual permits are a big help to our family, helping us be able to fish a full season and make a little money.

Thank you,


Tony Neal