

Source Document: CFEC Memorandum, Dated January 15, 2014  
 From: Marcus Gho, Economist, Commercial Fisheries Entry Commission  
 To: Glenn Haight, Executive Director, Alaska Board of Fisheries

Table 9. Cook Inlet salmon Drift Gillnet Permit Latency

Year	Total permits	Permits with Landings	Calculated Latency Rate
1975	624	464	25.6%
1976	583	510	12.5%
1977	569	528	7.2%
1978	588	577	1.9%
1979	599	592	1.2%
1980	598	553	7.5%
1981	599	584	2.5%
1982	592	577	2.5%
1983	588	580	1.4%
1984	587	577	1.7%
1985	591	584	1.2%
1986	588	584	0.7%
1987	586	585	0.2%
1988	585	584	0.2%
1989	585	10	98.3%
1990	585	582	0.5%
1991	584	578	1.0%
1992	583	580	0.5%
1993	583	580	0.5%
1994	582	569	2.2%
1995	582	577	0.9%
1996	582	560	3.8%
1997	581	572	1.5%
1998	579	528	8.8%
1999	575	487	15.3%
2000	576	513	10.9%
2001	574	467	18.6%
2002	572	409	28.5%
2003	572	418	26.9%
2004	571	440	22.9%
2005	571	471	17.5%
2006	570	396	30.5%
2007	571	417	27.0%
2008	571	426	25.4%
2009	570	404	29.1%
2010	569	378	33.6%
2011	569	462	18.8%
2012	<u>569</u>	<u>496</u>	<u>12.8%</u>
22103	19199		<b>13.1% Average</b>

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SUBMITTED BY:  
 BRUCE J. GABRYS  
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OPPOSE: # 126

SUPPORT: # 127  
 # 128  
 # 129

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 To: Glenn Haight, Executive Director, Alaska Board of Fisheries

Table 9. Cook Inlet salmon Drift Gillnet Permit Latency (Adjusted)

Year	Total permits	Permits with Landings	Calculated Latency Rate
1975	624	464	25.6%
1976	583	510	12.5%
1977	569	528	7.2%
1978	588	577	1.9%
1979	599	592	1.2%
1980	598	553	7.5%
1981	599	584	2.5%
1982	592	577	2.5%
1983	588	580	1.4%
1984	587	577	1.7%
1985	591	584	1.2%
1986	588	584	0.7%
1987	586	585	0.2%
1988	585	584	0.2%
1989	0	0	
1990	585	582	0.5%
1991	584	578	1.0%
1992	583	580	0.5%
1993	583	580	0.5%
1994	582	569	2.2%
1995	582	577	0.9%
1996	582	560	3.8%
1997	581	572	1.5%
1998	579	528	8.8%
1999	575	487	15.3%
2000	576	513	10.9%
2001	574	467	18.6%
2002	572	409	28.5%
2003	572	418	26.9%
2004	571	440	22.9%
2005	571	471	17.5%
2006	570	396	30.5%
2007	<u>571</u>	<u>417</u>	<u>27.0%</u>
	18670	17023	<b>8.8%</b>

Exxon Oil Spill - Drift Fishery close for Season

Average Adjusted for 1989 Oil Spill (1975-2007)

Year	Total permits	Permits with Landings	Calculated Latency Rate	Table 8 Dual Permit Registrations	Permits with Landings Plus Dual Registrations	Adjusted Latency Average
2008	571	426	25.4%	37	463	18.9%
2009	570	404	29.1%	35	439	23.0%
2010	569	378	33.6%	56	434	23.7%
<b>2011</b>	569	462	18.8%	66	528	<b>7.2%</b>
<b>2012</b>	<u>569</u>	<u>496</u>	<u>12.8%</u>	66	<u>562</u>	<b>1.2%</b>
	2848	2166	23.9%		2426	

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## Dual Permit Operations

In 2008, the Alaska Board of Fisheries passed regulations<sup>8</sup> allowing dual permit operations. Dual permit operations occur when two CFEC permit holders fish concurrently from the same vessel and jointly operate up to 200 fathoms of drift gillnet gear.

The areas open to dual permit operations have changed over time. From 2008 to 2010, the only areas open to dual permit operations were the so-called 'inlet wide' ADF&G statistical areas<sup>9</sup> in the Central District. Neither the Kenai Section nor the Kasilof Section was open to dual-permit operations. In those years, the realities of the area open to duals at any given point in time in the fishery may have necessitated some dual permit operations to move out of the 'D' boat configuration and participate as single permit holders instead. This may have changed somewhat in 2011 when the Kenai and Kasilof Sections became available to dual permit operations. Then, in 2012 regulations were altered again, and the 'Expanded' Kenai and Kasilof Sections became available to drift gillnet dual permit operations.

Table 8 describes vessel participation in the Cook Inlet drift gillnet fleet, and includes estimates of the number of dual permit operations. Two estimates are presented. The first is the number of vessels that registered with ADF&G as a dual permit operation prior to fishing. The second estimate is the sum of all vessels from the ADF&G registration list, *plus any other vessels not on the registration list but noted on fish tickets with two permit holders fishing concurrently from the same vessel.*

The second estimate in the table, which comes from the combination of ADF&G registrations and fish tickets, may represent the maximum number of dual permit operations participating in a year. Note that merely registering a boat as a dual permit operation does not guarantee that the permit holders actually follow through with their initial strategy. Also note that some vessels might function as a dual operation for the entire season, while others might fish intermittently as both a dual and single permit operation within the same year.

It is important to note that this table is different from other tables in this report as it counts vessels rather than individual persons or CFEC permits.

**Table 8. Cook Inlet drift gillnet fishery  
Number of vessels and estimates of dual permit operations, 2008-2012**

Year	Total vessels	Estimates of dual permit operations	
		ADF&G registration lists	Combined ADF&G registrations and ADF&G Fish Tickets
2008	415	37	37
2009	388	35	36
2010	353	56	69
2011	427	66	80
2012	460	66	76

The figures in Table 8 are preliminary and revised from the first version of this paper. A more complete review of Cook Inlet dual permit operations in the salmon drift gillnet permit fishery is forthcoming.

<sup>8</sup> See 5 AAC 21.333.

<sup>9</sup> The six statistical areas are: 244-50, 244-60, 244-70, 245-70, 245-80, and 245-90.

## Latent Permits

Each year, the number of permits renewed is greater than the number used to record landings. CFEC regulations require persons to renew their limited entry permits annually, irrespective of whether the person actually fishes.

Table 9 compares the total number of permits in the S03H fishery to the number of permits fished. Several complications make it difficult to accurately count the number of latent permits. The figures should be viewed with caution. Note that in this table, when individuals received an adjudicated permanent permit the same year they held an interim-entry permit, then both permits are only counted as one. If any landings were recorded on either of these two permits held by the same individual then it is counted as a permit with a landing.

In some cases, permits might be active in the fishery but might not be used to record landings. For example, this may have occurred when individuals fished in dual permit operations and all the landings were recorded only on their partners permit. The effect would be to under-count the number of permits with landings, and over-estimate the latency rate. Recall that regulations allowing for dual permit operations have been in effect since 2008.

There are many reasons why an individual may choose to not fish in any given year. This table does not explain any of the reasons, but rather simply estimates the rate of permit latency.

**Table 9. Cook Inlet Salmon Drift Gillnet Permit Latency**

Year	Total Permits	Permits With Landings	Calculated Latency Rate
1975	624	464	25.60%
1976	583	510	12.50%
1977	569	528	7.20%
1978	588	577	1.90%
1979	599	592	1.20%
1980	598	553	7.50%
1981	599	584	2.50%
1982	592	577	2.50%
1983	588	580	1.40%
1984	587	577	1.70%
1985	591	584	1.20%
1986	588	584	0.70%
1987	586	585	0.20%
1988	585	584	0.20%
1989	585	10	98.30%
1990	585	582	0.50%
1991	584	578	1.00%
1992	583	580	0.50%
1993	583	580	0.50%
1994	582	569	2.20%
1995	582	577	0.90%
1996	582	560	3.80%
1997	581	572	1.50%
1998	579	528	8.80%
1999	575	487	15.30%
2000	576	513	10.90%
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2004	571	440	22.90%
2005	571	471	17.50%
2006	570	396	30.50%
2007	571	417	27.00%
2008	571	426	25.40%
2009	570	404	29.10%
2010	569	378	33.60%
2011	569	462	18.80%
2012	569	496	12.80%

*'Total Fishery Permits' is the number of S03H permits issued in the year.*

*'Permits with Landings' is the number of CFEC permits that were used to record commercial landings in that year.*