

RC36

Attn: BOF Record Copy (RC)
Boards Support Section
Alaska Department of Fish and Game
P.O. Box 115526
Juneau, AK 99811-5526

Fax: 907-465-6094

Re: RC Comments Proposals 44 through 53

Dear Chairman Johnstone, Members of the Board,

I support proposals 44 through 53 repealing the setnet permit stacking sunset provision. I'm a setnet fisherman in the Ugashik District and my family and I have fished there for the past dozen years.

I testified in support of the stacking provision when it was originally introduced at the Board of Fish meeting in Anchorage. I spoke then on how the economics of fishing has changed over the years and I think what I said then still holds true. According to state statistics the average setnet site produces approximately 30,000 pounds per year. At last year's prices (\$1 less Bristol Bay taxes of 5%) that represents a gross income of \$28,500 but now look at the costs:

Crew cost of at least 10% or	\$3,000
Airfare last year:\$1,000 per person	\$2,000
Food for a month	\$ 750
Fuel/Oil	\$ 750
Permit costs (site lease and permit)	\$ 225
Cabin costs (repairs etc)	\$1,500
Freight costs	\$ 750
Skiff and gear (nets, line) repairs	\$1,500

Total direct costs \$10,475

These are just the direct costs. There also the capital costs that must be reserved for. Skiffs are \$25,000, motors another \$15,000. Building or buying a cabin \$35,000. Permits \$35,000. 4 wheelers \$5,000. If a person borrowed money to get into fishing the payments would eat through almost all of the money that remained after paying the direct costs.

That is why stacking makes sense: Most of the fixed capital costs can be spread over two permits with only a small increase in direct costs. One skiff can fish two nets on all but the busiest of days. You can always make room for another person in your cabin so those costs are the same. By having a second permit you are able to make enough to invest back into the business - like spending \$1,000 for slush bags for every bin on your boat so that you can ice fish.

Looking to the future I don't see any of our direct costs coming down. I think airfares will continue to increase. I can't imagine gas getting any cheaper. Gear costs continue to rise. All these factors would support stacking in the future.

In the area I fish there is widespread support among the setnetters for stacking and for the repeal of the sunset provision. Almost all of the fishermen in our area fish multiple permits and have for as long as I have been there.

I appreciate the opportunity to submit these comments

Sincerely



Pat Salvucci