

Kevin McCambly

3455 Trumpeter Drive

Dillingham, AK 99576

Set net fisherman from the Nushagak District(combine flats)

It is noted that the figures showing the count of individuals who held two permits do not include Emergency Transfer permits where the permit reverts back to the permanent permit holder at the end of each year. This does not directly indicate that these permits are held by Bristol Bay Watershed residents. If you look at the total of local residents with two permits at year-end, just 13(12.38%) of the total 105 were watershed residents. If 92(87.62%) of the year-end dual permit holders were from other areas or out of state, it seems obvious that this creates a disadvantage to those from Bristol Bay who are trying to get into the fishery.

When looking at a count of in-season permit stacking, the numbers become clear that the number of locals with dual permits decline. My point is local fisherman truly are the family operations keeping family members involved in the operation.

The considerable increase in permanent stacked operations coincides with the growth in number of non-local dual permits. Originally permit stacking was under the idea that set-netting is more of a family operation. Why then is only 56% in 2010, and 51% in 2011, of the second permits acquired from immediate family of relatives? So much for "keeping it in the family."

New entrants were at an all-time low of 6% in 2011 further indicating permit-stacking will only make it harder to buy into the fishery. Only some will be afforded the luxury of increasing profits through this process, yet fewer people will be in a captain's position. Dual permitting decreases the amount of permit holders. Through the reduction of separate fishing operations, there will also be a drop in the number of crew members hired.

With more people holding on to multiple permits, this will make the value of permits increase. My theory is that as fewer people are involved while those involved are then able to hold onto permits longer and off the market, it will make the asking price go through the roof. Not allowing dual permits will increase the availability of permits through natural turnover of people fishing due to various reasons. The very statement of permit stacking would result in making the fishery more profitable; therefore, would be more enticing to individuals to enter the fishery directly causes the cost of a permit to increase as they would become more lucrative.

My last point will be that those with the option of fishing a second permit are paid more for a lower quality product. If one person manages two or four sites, fish soak longer and are increasingly more likely to go dry on the mud flat which is counterintuitive to "slushing" or

using RSW systems. They harvest more fish; make more in profits, enabling them to invest in chilling capabilities while delivering a lower percentage of "number-one grade" fish. They are also paid more in incentives because of production from processors as their total poundage is not divided among the number of permits their "family operation" owns. This creates a greater discrepancy between single permit operations and those putting poundage from multiple sites onto one ticket causing processors to increase the required poundage for incentives.

My conclusion is that permit stacking makes it harder for locals to buy into the fishery. If it then becomes easier or more enticing to take a stable job offered by mining groups (such as Pebble), no matter if it is temporary, all permits will decrease in value along with the overall demand for Bristol Bay Wild Salmon. If dual permits should be allowed, something enacted such as points accumulated requiring those in possession of a second permit to sell or transfer after a couple of years; much like the implications/limitations on medical transfers on medical transfers.

Please do not repeal the "sunset clause." I do not support set net stacking for SO4T.

I support Proposal 1;

I support Proposal 3

I support Proposal 4-why prohibit baiting if you're still allowed to chum?

I support Proposal 15;

I support Proposal 16;

I support Proposal 17;

I support Proposal 19;

I oppose Proposal 24;

I oppose Proposal 25;

I oppose Proposals 31-35;

I oppose I oppose Proposal 36, 37, 38;

I strongly oppose Proposal 44-55;

I oppose Proposals 58-61;

I oppose Proposals 76, 77;

I oppose Proposals 79, 80;

I oppose Proposals 83, 84;