



October 23, 2018



options. Accordingly, in order for the SaMTAAC and Council to meaningfully evaluate recommended proposals, the analysis should evaluate the economic performance of the trawl fishery in the analytical context of an immediate cessation of gear switching by fixed gear vessels that do little or no trawling. This analysis should seek to accurately portray the effects cessation would have as relates on all facets of the program’s Goal and Objectives, but in particular; “full utilization of the trawl sector allocation” and Objective 6 “Promote measurable economic and employment benefits through the seafood catching, processing distribution elements and support sectors of the industry”.

While such immediate restriction may not be practically feasible to implement, only by evaluating economic performance and attainment of the fishery in the absence of gear switching can the SaMTAAC and Council adequately evaluate proposed actions to *improve* economic performance and attainment in the ITQ Trawl fishery going forward.

This analysis of the immediate cessation of ITQ sablefish harvest by primary fixed gear (non-trawl) vessels needs to be coupled to an evaluation of rebuilding the lost markets, skilled work force and infrastructure that has eroded since implementation of the ITQ program. Two major processors have now stated they are ready to begin this task if there is assurance that we can plan on the full supply of necessary sablefish bycatch to harvest these underutilized species. For this reason, the analysts must look at economic outcomes over a multiyear period of no less than five years.

Thank you.

Sincerely,

Handwritten signature of Mike Okoniewski in blue ink.

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