

(From Jeff Lackey)

I am going to read the amdt 20 goal in its entirety, and as I do, I suggest to think about it in terms of the bottom trawl fishery:

Amdt 20 Goal: Create and implement a capacity rationalization plan that increases net economic benefits, creates individual economic stability, provides for full utilization of the trawl sector allocation, considers environmental impacts, and achieves individual accountability of catch and bycatch.

Bottom trawlers have seen cost increases with 100% observers, cost recovery, and lease costs. And even though stocks have rebounded, catch is down. This is not a recipe for individual stability or for full utilization of the trawl sector allocation. There has been a degradation of the bottom trawl fishery. 25.6M dover caught in 2009 but only 14M in 2018. Given the rebuilding of stocks and the promise of the program, 25.6M dover should have been a floor from which to build, and not a hard to imagine goal given the exodus of a third of the most important species from the fishery and program induced costs.

Businesses have business units that are each evaluated. If business units are unstable, underperforming and burdensome, they usually get streamlined or axed by the business decision makers as resources and efforts are re-directed to more profitable and stable business units. Processors are businesses with business units. The bottom trawl fishery is mainly dependent upon two buyers to continue to invest in and grow this difficult business unit. There is a risk that processors will make a business decision to streamline their underperforming bottom trawl fishery business unit. In California, we have seen what happens when trawling is not supported and goes away along with the infrastructure. It is difficult gaining back ground once services & plants go away and something like condos take their place.

So, as the SaMTAAC and as the Council, you have a choice between two paths, and you can only choose one. One choice is to continue the exodus of 1.7+M pounds of trawl quota away from the bottom trawl fishery and to fixed gear vessels. The other choice is to attempt to rebuild the bottom trawl fishery to at least pre-program catch levels and maximize fishery ability to meet goals and objectives by reducing over time fixed gear attainment. You can continue the exodus or rebuild the fishery. You cannot do both. You must choose; there is not enough sable to do both. You can say you will do both, but I don't see how mathematically you can do both.

The SaMTAAC's job at this meeting is develop a range of alternatives. You already have an alternative for continuing the exodus, it is called status quo. Currently the alternatives on the table continue the exodus, and none commit to rebuilding the bottom trawl fishery and trying

to meet program goals and objectives. So, what are we really doing here? Alternative #4 is so watered down that there is no hope of even beginning to address the exodus, even in a small way, until maybe 15-20 years down the road. We have not spent hardly any time at this meeting on how to reverse the degradation of the bottom trawl fishery.

I have heard the suggestion, of which I could support, that says if you owned your quota and vessel before the control date, you can fish it however you want for as long as that owner is in the fishery. This would recognize investment of all quota and vessel owners.

If the choice is made to continue the exodus, then you are choosing to:

- 1) Accept the degradation of the bottom trawl fishery
- 2) Accept the failure of the bottom trawl fishery to achieve goals and objectives
- 3) Accept the risks of degradation's effects on fishing infrastructure, coastal communities, and on the trawlers and groundfish processors who the program was primarily developed for.