

The evidence that gear switching is a major detriment to utilization and achieving goals & objectives is overwhelming; reviewing the evidence:

- 1) Dozens of trawl vessels catching multiple species left the trawl fishery with catch shares to be effectively replaced with about a dozen fixed gear vessels catching large quantities of sable and almost nothing else.
- 2) Trawl vessel sable leverages 800 pounds of other catch while fixed gear vessels leverage 5 pounds.
- 3) The loss of a third of the bottom trawl fishery capacity with catch shares corresponded with about a third of the sable leaving the trawl fishery.
- 4) The five-year review showed millions of pounds of annual dover catch loss from gear switching, not to mention all of the other groundfish species landed with bottom trawl.
- 5) There are only two species that make it worth a bottom trawl vessel even thinking about untying from the dock, and sable is by far the more important of the two for groundfish utilization. How could losing a third of it from the fishery not have devastating impacts?
- 6) Gear switching is not the only problem; however, it is a double whammy because when you couple it with other problems like increased program costs, gear switching also becomes the sieve by which the life blood of the fishery leaks out, degrading, possibly permanently, the capacity of the fishery to meet the goals and objectives.
- 7) Most importantly, 44 trawl vessels, 5 processors, WCSPA, MTC, & OTC, through the two trawl stakeholder letters, are letting you know that gear switching has been a major detriment to our fishery and must be curtailed as soon as possible in order for the program to reverse that damage it has done to utilization, fishery & community stability, and goals & objectives.

The five-year review process is more than three years old now, and we are no closer to addressing the program's vast negative impacts to utilization and goals & objectives for bottom trawl than we were on day one. The SaMTAAC has been primarily focused on fixed gear, in its makeup, its focus of discussions, its analysis, and its alternative development. SaMTAAC has largely ignored its charge and program goals & objectives. People may take exception to this statement, but the proof is in the pudding. The five SaMTAAC alternatives on the table (including status quo) allow an increase in the fixed gear attainment that has been such a major detriment and, as far as I can tell, none of the five direct a fixed gear attainment reduction in the foreseeable future. We have spent three plus years avoiding asking the most important question, which is how do we rebuild the bottom trawl fishery in order to meet goals and objectives. It may be that people don't want to hear the most obvious answer, which is we need the sable. The sable is 100% necessary for rebuilding the fishery.

We can turn the focus of the SaMTAAC back to its charge by the following steps:

- 1) Adopt the NMFS proposed purpose & need statement without substantive modification.
- 2) Set a target of increasing bottom trawl landings to pre-catch share levels.
- 3) Adopt the two trawl stakeholder alternatives as written, and possibly add a third trawl focused alternative.
- 4) Perform the analysis requested in OTC letter and the 2nd trawl stakeholder letter.
- 5) For future analysis of alternatives, prioritize measurements against all goals & objectives, SaMTAAC charge, and adopted NMFS purpose and need.