

Public Comment 2
Jeff Lackey

My comment is in two parts: First, four main points from my previously submitted written public comment. Second, five additional points for the process moving forward.

Written Public Comments Main Points

- 1) 2011 bottom trawl fishery degradation: 2011 Catch Shares implementation resulted in an immediate mass exodus of sable, underutilization of bottom trawl dominant species, and loss of employment, which was in the 30-50% range for processor workforce.
- 2) Sable & Capacity Link: Sable supply and its certainty is directly tied to fishery capacity because sable co-occurs with all ifq species and the fishery logistics and economics don't work without it.
- 3) Historical fishery increases take two years: Past quota increases of dover in 2007 and widow in 2009 have resulted in vast attainment increases in two years. Certainty of quota increases allows fresh market development, processing plans & investments, but it takes a little time.
- 4) Purpose and Need: Purported "other causes" of low attainment added to the P&N should be removed because:
 - a. They are symptoms and not causes
 - b. Gear Switching was already removed from other issues in five-year review as a priority issue on which to focus

Additional Points

- 5) Bottom trawl split: 2018 bottom trawl catch data shows 808 lbs ifq catch (excluding petrale) per 100 lbs of sable. 808 breaks down to 457 lbs dover & 351 lbs other ifq species. This gives an idea of ifq species catch ratios besides dover.
- 6) ROA: There still seems to be missing a full ROA to provide complete contrast in the near term in the analysis in the process going forward.
- 7) Time Based Exemption Expirations: For simplification, SaMTAAC may want to consider time based in addition to ownership change based expirations for exemptions. Rationale would be easier oversight & certainty to all stakeholders. Formula could be cut exemptions in half in X # of years and expire in Y # of years.
- 8) Sector Integrity: Gear switching has reminded us why Councils use sectors. This process here is no fun for anyone. The value of sector integrity is very high but something that would be impossible to quantify in analysis. As the SaMTAAC advises Council and decisions are weighed, qualifying the importance of sector integrity and placing a higher value on alternatives that have a higher degree of sector integrity would be beneficial. We don't want another multi-year CAB & SaMTAAC process starting up five to ten years from now.
- 9) Importance of addressing low attainment & SaMTAAC charge: As evidence by the high priority gear switching was given out of the five-year review process and also by the forty-four trawl vessels, five processors, WCSPA, MTC, & OTC signing onto two alternatives to limit gear switching for the October SaMTAAC, this is an extremely important issue. We want to rebuild the fishery that was severely damaged in 2011 to the benefit of vessels, processors, fishing communities, and seafood consumers. Please do not delay this process.