

My name is Jeff Lackey. I manage two vessels out of Newport, one of which, the Miss Sue, participates in the bottom trawl fishery in the catch shares program. Today I ask the council and NMFS to start the conversation about opening up RCA's now that the catch shares program is in its third year.

We know NMFS's resources are limited and must focus on issues determined to be of a high priority. Opening up RCA's is a high priority for the following reasons:

- 1 The catch shares program by design constrains fishermen by the small amount of certain species they have to work with. This is a system that the majority of the industry, including myself, fully supports; but the issue at hand is the old constraints of the old management system are added on top of the new constraints to create inefficiencies for fishermen and underutilization of the resource.
- 2 The RCA's are a relic of a previous fishery management system that do not reflect the reality of individual responsibility and observer coverage under the catch share program.
- 3 Of the seven purpose statements in the MSA, four statements (#'s 1, 3, 4, & 6) specify efficient utilization of the fishery resource. Purpose statement #6 reads "to encourage the development by the United States fishing industry of fisheries which are currently underutilized or not utilized ... to ensure that optimum yield determinations promote such development in a non-wasteful manner"
- 4 The whiting fishery is at 96%-99% utilization, but the non-whiting portion of catch shares species is at 29% utilization.
- 5 There has been discussion about prioritizing the Adaptive Management System, which is noble in its intent to help communities. The best way to help communities is to increase non-whiting utilization, because that is the only way to grow the industry, which directly leads to benefits of increased employment. Opening up the RCA's may be the best way to increase utilization and benefit communities.
- 6 Diversity of fisheries is important for the health of the industry, (coastal communities, employment, entry level opportunities, etc.). While the

whiting fishery has obviously benefitted under catch shares, the non-whiting sector has more challenges to utilize the resource; but the next few years will bring increased observer costs and cost recovery fees that makes the urgency of reviewing archaic constraints more apparent.

- 7 Increasing fishery resource utilization will not only achieve MSA specified purposes, but will increase overall value of catch shares fisheries, thereby increasing buyback loan payments and cost recovery payments.

I understand that any discussion about RCA's rightfully leads to a discussion about conservation. The MSA clearly calls for resource utilization and conservation to work together, which again, makes the urgency of starting the conversation and comprehensive process of looking at RCA's more apparent since this will not be an overnight process.