Mr. Robert Turner, Assistant Regional Administrator  
National Marine Fisheries Service  
Sustainable Fisheries Division  
7600 Sand Point Way,  
Seattle, WA 98112  

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The at-sea whiting mothership sector request an action to transfer 3 metric tons (mt) of darkblotted rockfish into the mothership sector so that the industry can harvest the remaining 21,165 mt of hake worth approximately $5 million in ex-vessel value and another $5 million in ex-processor value. We believe that NMFS has the authority to transfer unutilized darkblotted rockfish that remains within the Annual Catch Limit (ACL). This action will prevent premature closure of this economically important fishery.

The MS whiting cooperative closed the fishery on Saturday following simultaneous catches of darkblotted that morning that caused the sector cap of that species to be exceeded. Over the three-day weekend the fleet returned to port and has unloaded most of the processed product. Once that job is complete, it will be impossible to hold the crews on board. We respectfully request immediate action for that reason.

The trawl rationalization program is intended to increase net economic benefits, create individual economic stability, provide full utilization of the trawl sector allocation, consider environmental impacts and achieve individual accountability of catch. The mothership sector cooperative has demonstrated an aggressive commitment to reducing bycatch of overfished species utilizing various controls for limiting bycatch including information sharing of hot spots, bans on night fishing, voluntary areas closures and daily reports and alerts with real time information on a haul by haul basis of what the fleet is catching. During the 2014 fishery, in addition to implementing several closed areas, the mothership cooperative vessels have moved many times in order to minimize their bycatch. These moves, often to less productive grounds, have come at great cost in fuel, increased overhead and in lost fishing time. With very limited caps on four rockfish species, the whiting fishery has done an excellent job of keeping bycatch to a minimum. Nonetheless, several simultaneous lightning strikes suddenly shut down the fishery.

The MS fleet had only harvested 1.69 mt of darkblotted rockfish between the start of the season on May 15th and October 10th while harvesting over 48,000 mt of hake. On Saturday morning, October 11th, the MS fleet suddenly surpassed its allocation of darkblotted. Several vessels were...
fishing in the vicinity of one another and the tows were delivered virtually simultaneously to three processors resulting in 4.72 mt of darkblotched being landed. The fleet had fished cleanly in this area on the two preceding days, but something caused the darkblotched rockfish to move into the area that morning. Once the overage was realized, the mothership fishery was immediately closed by the cooperative manager on Saturday afternoon.

We request that NMFS review the amount of excess darkblotched rockfish available in the Pacific Fishery Management Council’s Scorecard and consider apportioning 3 mt of unutilized darkblotched rockfish to the MS Whiting sector (coop). Review of the Pacific Council’s Scorecard of Allocations and Projected Mortality Impacts of Overfish Groundfish Species for 2014 shows projected darkblotched impacts across all fisheries and uses should come in at 95.7% of the Annual Catch Limit (ACL) with 14.3 metric tons likely not caught. In addition, the ACL for darkblotched (330 mt) is only 60% of the Acceptable Biological Catch for this species of 553 mt creating a 221 mt buffer between the harvest guideline and the overfishing level. Lastly, the “off the top” deductions for darkblotched that are taken before the trawl / non-trawl allocation is made show a projected difference of 3.4 mt. The latest scorecard can be found here http://www.pcouncil.org/wpcontent/uploads/J4b_Sup_GMT_Rpt_SEPT2014BB.pdf. Further, flexibility was purposely and explicitly built into the 2013-2014 specifications and resulting regulations to allow easy transfer of unused “off the top” set asides if “it is needed.” Current projections in the scorecard show that they set aside 3.3 mt MORE than these categories will use.

There is fish available to fix this problem. Recognizing that a transfer of three metric tons will not cause a conservation concern for this species, we hope you will utilize the flexibility allowed in the regulations to solve this problem and put the fleet back to work.

Thank you very much for your expeditious review of this tragic situation. Leaving over $10 million of unharvested Whiting in the water is such a loss that we urge the NMFS to pursue any available options to provide the MS cooperative with a small amount of darkblotched rockfish that will enable us to finish up our 2014 season successfully.

Thank you for your consideration.

Heather Mann
Midwater Trawlers Cooperative

Brent Paine
United Catcher Boats

cc Dorothy Lowman, Pacific Fishery Management Council Chair
Don McIsaac, Pacific Fishery Management Council Executive Director