Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: Agenda Item B.1. Open Public Comment

November 5, 2014

Dear Chair Lowman & Council Members

Midwater Trawlers Cooperative (MTC) represents 23 mid-water trawl catcher vessels that primarily participate in whiting and groundfish fisheries on the west coast as well as pollock and cod fisheries in the Bering Sea and Gulf of Alaska.

I am writing to you today on behalf of the MTC membership to express our sincere gratitude to the Pacific Council and the National Marine Fisheries Service (NMFS) for their extraordinary efforts to address the recent crisis in the whiting mothership fishery sector.

As you know, the whiting mothership sector closed quite suddenly and unexpectedly on October 11th when several catcher vessels simultaneously delivered tows of whiting which contained “lightning strike” amounts of darkblotched rockfish. The mothership cooperative manager immediately closed the fishery upon realizing that the 6.3 mt hard cap of darkblotched rockfish had been exceeded. At the time of the unexpected closure over 21,000 metric tons of whiting was stranded in the water. Nine MTC vessels still had close to 50% of that stranded fish equating to lost revenue for the vessels, their crews, their associated communities and even NMFS through the cost recovery program.

My colleagues and I worked together tirelessly with NMFS and Council leadership and staff to identify a reasonable approach to reopen the mothership fishery without impacting any other sector or fishery in the process. When NMFS determined that they did not have the legal authority to transfer the needed darkblotched in a timely fashion without Council guidance an
emergency Council meeting was called. It has not been lost on me, my colleagues or any of the MTC members just how exceptional this action was.

Thank you for recognizing the importance of this fishery and the economic damage that would have occurred if the fishery were not reopened quickly. I am proud that the fix that was identified and implemented did not negatively impact any other sector or fishery and did not cause any biological or conservation concern whatsoever for darkblotted rockfish.

The mothership whiting sector started the season with 6.3 mt of darkblotted rockfish to catch 62,249 mt of whiting. A tribal reapportionment on September 12th, 2014 of 6,000 mt more brought the sector’s total allocation to 68,249 mt. Bycatch hardcaps are not adjusted upwards based on tribal reapportionments. The cooperative members did an excellent job of avoiding darkblotted rockfish until the morning of October 11th when several vessels delivering to three different mothership platforms caught almost 5 mt of darkblotted rockfish simultaneously. Transferring additional darkblotted rockfish into the mothership sector was the only way to reopen the fishery and have a chance to harvest the stranded fish.

Darkblotted is projected to be rebuilt in 2017 and the rebuilding paradox confronts all sectors that interact with the species. Identifying ways to increase management flexibility to respond to situations like the one that occurred in October without negatively impacting other sectors or fisheries is imperative moving forward. I look forward to working with Council leadership and staff as well as NMFS to meet the Magnuson Act National Standards to achieve optimum yield and benefits to the nation on a sustainable basis.

Thank you for your remarkable efforts to address this situation. Your dedication to sound fisheries management and a robust and transparent process is very much appreciated and will not soon be forgotten.

Sincerely,

Heather Mann
Executive Director