



ARCTIC STORM MANAGEMENT GROUP, LLC

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Seattle, Washington 98121 U.S.A.

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

November 4, 2014

Dear Ms. Lowman,


On behalf of the 119 employees working aboard the Arctic Storm mothership and the fleet of vessels delivering whiting to our processing platform, Arctic Storm Management Group would like to express its deep appreciation to the Pacific Fisheries Management Council and the National Marine Fisheries Service (NMFS) for taking action last month to extend the Mothership (MS) whiting fishery with an inseason reallocation of darkblotched rockfish.

Timing was crucial when simultaneous lightning strikes of bycatch abruptly closed down the MS whiting fishery with more than a third of the sector's whiting allocation, valued at about \$10 million, still in the water. That the agency and Council responded so quickly to take action that would allow achievement of OY without negatively impacting darkblotched rockfish, Chinook salmon or other fishery participants, is a tribute to the level of commitment and flexibility inherent in the regional management process.

The successful rockfish rebuilding programs coupled with the high abundance of whiting have made it increasingly difficult to harvest whiting. When the fleet moves from one area to avoid bycatch of one species, it inevitably encounters bycatch of another species. This year has been extraordinarily tough with the abundance of whiting so high and the rockfish caps fixed at very low levels even though the successful rebuilding programs are increasing those populations and making avoidance so much more difficult. Under these circumstances, the MS sector has limited tools available in avoiding encounters with the hard cap allocations of rockfish. Unlike the shoreside sector, the MS sector does not have access to other sources of rockfish bycatch available in the IFQ program. Nor do the smaller, less powerful catcher vessels have access to the deeper waters fished by the catcher processors when avoiding rockfish.

When the darkblotched rockfish cap was triggered and our fishery suddenly shut down, the MS sector requested 3 mt of darkblotched rockfish be reallocated so that the fishery could remain open. Only 58 mt of the 330 mt annual West Coast allocation of darkblotched rockfish had been used. Clearly, the proposed reallocation would have neither a negative conservation impact on the stock or on other users. However, there were some procedural hurdles to overcome as well as concerns about Chinook bycatch. It took a concerted effort by everyone to address all these issues in a transparent process. In the end, that effort had a very powerful and positive impact on MS fishery participants who faced losing some or all of their whiting income.

Thank you again for the extraordinary effort by Council members, staff, and NMFS regional leadership in making this happen.

Sincerely,


Donna Parker
Director of Government Affairs