

AMERICAN ALBACORE FISHING ASSOCIATION

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February 18, 2008

VIA EMAIL TO: PFMC.COMMENTS@NOAA.GOV

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: U.S. North Pacific Albacore Fishery: Requests for Consideration; Limited Access Program Discussions, HMS Permit Actions, and Amendment of FMP

Mr. Chairman and members of the Council,

The American Albacore Fishing Association (AAFA) is a nonprofit corporation made up of American commercial fishing vessels that participate in the West Coast troll & bait-boat albacore fishery.¹

The West Coast albacore fishery remains the last “open access” fishery available on our coast. HMS permits are readily available for anyone who wishes to participate in the fishery.

When the Council established a “control date” of March 9, 2000, it intended to discourage speculative entry into Pacific Coast HMS fisheries. The control date was to provide the Council with adequate time to determine whether it would limit participation in the fisheries.

Rather than discourage speculation, the establishment of the control date has helped foster an undesirable practice among HMS permit holders. When applying for, or renewing, HMS permits, it is now commonplace to designate numerous additional gear types. This has resulted in the HMS permit database becoming a poor reflection of fishery participation data.

There are additional unintended side effects that stem from the establishing of the control date. The ensuing years of relative inaction have served to create uncertainty in the

¹ AAFA is founded upon the belief that, by promoting the environmental benefits of the troll and bait-boat fisheries and promoting the health benefits of tuna consumption, the economic viability of these traditional “pole & troll” fisheries can be sustained.

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fishery. Current vessel owners face uncertain consequences if they replace their current vessel or obtain an additional vessel. Current crewmembers desiring to captain their own vessels are reluctant to invest in a fishery with its future in limbo.

Meanwhile, albacore processors and buyers claim that the U.S. fleet is unable to deliver adequate quantities of fish and that foreign fleet contributions are necessary. AAFA believes that action by this Council could provide greater certainty for the albacore fishery's participants and that such actions would enable the U.S. albacore fishery to prosper.

The possibility of a limited entry, *aka* limited access, program for albacore has been mentioned in recent years in some of the Council's situation summary documents. In the past, the issue did not generate much interest. However, circumstances have changed and reconsideration of the issue is warranted.

At the present time, international resolutions of the IATTC and the WCPFC call for caps on fishing effort and recent albacore stock assessments have called for reductions in fishing mortality. In this environment, it is becoming apparent that action is necessary to address the "open access" feature of this albacore fishery.

AAFA is aware of the need for ensuring adequate time for thorough analysis of the issues. Discussion of the potential benefits, as well as studying the lessons of other limited access programs, will take time. For these reasons, we believe that discussions regarding the possibility of a limited entry program should be initiated now.

Accordingly, AAFA respectfully requests that the Council assign its HMS Management Team and HMS Advisory Subpanel to initiate discussions in consideration of a limited access program for the West Coast albacore fishery.

AAFA believes that an effective and sound limited access program would help to ensure the future of this sustainable fishery, its participants, and the fishing communities and coastal economies it supports.

Related to AAFA's request for initiating discussions of a limited access program is AAFA's concern over the continued issuance of HMS permits.

In light of international resolutions, stock assessment recommendations, and the Council's intention to discourage speculation in the fishery, AAFA respectfully presents a number of recommendations for the Council's consideration and adoption.

AAFA recommends that the Council consider establishing a 10-year moratorium on the issuance of new HMS permits for gear types that take significant amounts of albacore (as either target or non-target catch).

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AAFA recommends that the Council undertake efforts to improve the accuracy of the HMS permit database by initiating a review of the permit database aimed at removing gear type designations from issued HMS permits that have little or no landings data associated with them over a reasonable time frame.

Fishery gear types and methods that are selective, i.e. have minimal by-catch, should be encouraged and promoted for their contributions to sustainable fisheries and the essential fishing communities they support. Efforts should be undertaken to preclude other gear types from negatively impacting the albacore fishery through excessive or unacceptable by-catch, discards, or other negative effects.

AAFA recommends that the Council direct the amendment of the Fishery Management Plan (FMP) to address the anticipated impacts of a significant increase in effort, catch, or by-catch by particular gear types. It is also recommended that such amendment of the FMP be undertaken in accordance with the goals and requirements of the National Standards Guidelines, 50 CFR 600, and related case law.

AAFA believes these suggestions are but potential first steps toward moderating short-term future increases in albacore fishing capacity and effort which would help stabilize fishing mortality and work toward ensuring the sustainability of the albacore fishery for this and future generations.

Thank you for your time and consideration.

Sincerely,

Chip Bissell
AAFA representative