Don Hansen - Chairman
Pacific Fisheries Management Council
7700 NE Ambassador Place, Ste 200
Portland, OR 97220-1384
Via Facsimile 503-820-2299

Re: Effort Controls in U.S. Albacore Troll Fishery

March 26, 2008

Dear Mr. Hansen:

Western Fishboat Owners Association (WFOA) maintains the position that North Pacific albacore has not been declared overfished, and no overfishing is occurring. Therefore, WFOA feels there is no imminent need for effort controls or limited entry on the U.S. albacore troll, baitboat, or recreational fisheries. This is especially true in regards to the recent ISC albacore workshop, where a new model was developed, which may give better indication on the status of North Pacific albacore in the coming years. Also, no declaration of overfishing was made by the working group.

The U.S. albacore fleet shows no potential for expansion at this time and any excess capacity issues could be addressed first by limiting the Canadian effort with the U.S. EEZ if needed.

WFOA also sees no immediate move toward effort control from the IATTC and WCPFC. Until other nations contribute, the U.S. is unwise to pursue unilateral reduction on a static fleet that catches only 15% of the northern albacore.

We do however remain aware of potential latent capacity if market values of albacore increase and it attracts boats into the fishery with very minimal historic landings. However, given present day operating costs, age of fishermen, and age of vessels we do not see that as a serious threat at this time.

WFOA continues to monitor the sentiment of our membership on this issue at our district and annual meetings. WFOA will report any changes in direction to the PFMC. WFOA represents a large segment of the albacore fleet and does have some divergent views within. However, the vast majority of our membership does not support effort controls on the U.S. albacore fleet at this time. If we ever had to support effort reduction, WFOA would want the process and result based on conservation of the resource, and sound science. We would also want it applied to ALL albacore user groups both foreign and domestic. Past history of other limited entry regimes in other fisheries have found that even the best plan and intentions can come out of the amendment process unrecognizable.

Sincerely,

Wayne Heikkila
Executive Director