



WESTERN FISHBOAT OWNERS ASSOCIATION®

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PFMC

February 18, 2000

Dr. Donald McIsaac, Executive Director
Pacific Fishery Management Council
2130 SW Fifth Avenue, Suite 224
Portland, Oregon 97201

Via Fax: (503) 326-6831

Dear Dr. McIsaac:

The Western Fishboat Owners Association (WFOA), a California-based non-profit organization, was founded in 1967 and currently represents over 500 albacore tuna jig boat owners from California, Oregon, and Washington, and also Hawaii, Canada, and New Zealand. Our members include vessel owners operating within the US EEZ and also on the high seas in both the North and South Pacific. The vast majority of WFOA members are based out of the Pacific west coast.

In March the Pacific Fishery Management Council (PFMC) will be addressing the possibility of declaring a control date for the Pacific Highly Migratory Species (HMS) fisheries and other HMS permit related issues. I would therefore like to direct your attention to the following WFOA positions:

- **Management Jurisdiction:** due to the highly migratory nature of Pacific albacore tuna and other Pacific HMS species under consideration, WFOA strongly recommends that these fisheries be managed by through a PFMC-administered Federal Fishery Management Plan, with cooperation from the Pacific Northwest States and other Pacific Councils. Note that the Pacific HMS fisheries are shared by fishermen from many different countries as well as US fishermen from multiple Council districts.
- **Pacific HMS Control Date:** WFOA urges the Council to formally declare a control date for the Pacific HMS fisheries during their March meeting. Doing so will open up a number of options for future Council action that are not currently available.
- **Pacific HMS Permit Moratorium:** It is our position that a moratorium for new entries into the Pacific HMS fisheries — or at least the Pacific albacore fishery — should be implemented as soon as possible. WFOA recognizes that although the albacore fishery is healthy and currently operating below MSY, it is still one of the few remaining open-access fisheries on the west coast, and may therefore be in danger of becoming a “dumping ground” for displaced vessels from less healthy fisheries. While the Pacific albacore fisheries are currently healthy, our markets are limited. WFOA believes a general moratorium would provide the Pacific HMS fisheries with basic protection while objectives and options for a comprehensive, long term limited entry permit system are explored.

WFOA representatives will attend the March 9th Council meeting to provide additional comments on permit moratorium issues. WFOA also recognizes that issues may arise in the upcoming MHLC-6 meeting in April that may require amending our positions at some point in the future. Thank you for your consideration of these concerns and recommendations that we make now.

Sincerely,



Wayne Heikkila
General Manager

cc: WFOA Board of Directors
PFMC FMP Development Team
PFMC HMS Subpanel
Tana McHale, HMS consultant / researcher