

**WESTERN FISHBOAT
OWNERS ASSOCIATION®**



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RECEIVED

June 6, 2006

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PFMC

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

Re: "Current Levels of Effort"

Dear Chairman Hansen:

Western Fishboat Owners Association representing more than 400 west coast albacore trollers is concerned about PFMC's involvement in determining what "current levels of effort" mean as written in both the IATTC and WCPFC resolutions on Northern Albacore.

These resolutions were passed internationally as a way to address potential overfishing of albacore in the Western Pacific Ocean, and to check any possible foreign expansion into the IATTC region east of 150W. The council needs to be aware of these events and understand them. However, to proceed beyond discussion and data collection at this time may be premature.

WFOA does recognize the seriousness of the issue of control effort if it is required. Nonetheless, to move into a limited entry, capacity control, moratoriums, TAC's, or other measures without up to date scientific data and multilateral action on an international scale could do more damage to another U.S. fishery at a time we can ill afford it.

Therefore to try to answer the question of what is "current effort" in the troll albacore fleet, I would say you have to; determine participants (including Canada, Japan, other Asian nations and the IUU fleet) and capacity and fleet expansion or reduction over the past 10 seasons.

From 1996 -2006 there was a period of relative stability in the catch rates and effort for U.S. albacore troll fishermen. In the early 1990's was a period of low landings and effort probably due to illegal high seas netting in the late 1980's. The trend reversed from 1991 onward and became stable in 1995. Thus, the period I mentioned above would reflect a time if there was to be a huge expansion of the fleet and catch it would have occurred. Likewise, given that the fleet was probably at its zenith in the late 1990's there was no resulting drop off of catches during or after that time. Since 1996 there has been virtually no albacore vessels built, and the few larger vessels built during 1996 have gone into other fisheries such as the Samoan and Hawaii longline fisheries. Also, at least 35 albacore vessels have sank during the last 10 years, and many fishermen have retired or were bought- out of other regulated fisheries such as groundfish thus eliminating potential albacore vessels.

Some points the PFMC should consider are:

- The U.S. fleet size is shrinking by attrition and other factors such as rising fuel and insurance costs. No new vessels are being built or entering the fishery. The average age of an albacore vessel is about 40 years and average age of the fishermen is about 61. Because of regulation most younger people are not getting into the fishery.
- Albacore is being managed by the WCPFC, IATTC, WPFMC, PFMC, and the Northern Committee of the WCPFC with many political issues and turf to be resolved.
- There may be an overfishing problem in the Western Pacific, but no assessment has been completed. The next meeting of the International Scientific Committee (ISC) will be in December 2006.
- In normal years the U.S. fleet lands about 16% of the North Pacific catch. The catch rate since 1995 has been stable between 10,000 and 19,000 mt with an average of about 14,000mt.
- Further reduction of Canadian albacore fleet from a high of around 300 vessels to less than 100 in the U.S. EEZ over the past three years has also lessened effort on albacore within the EEZ.
- The U.S. fleet may have less affect than the IUU vessels fishing offshore. The PFMC can aid U.S. fisheries by actively encouraging increased tracking and apprehension of IUU vessels.
- Fuel prices exceeding \$3/gallon will be the end of for large capacity vessels, and will limit time spent fishing. Recently, there have been reports that Asian and New Zealand fleets are already dramatically affected by the high cost of fuel and low fish prices.

Given that the International problem is with entry of new effort, and not with regulating US effort we do not feel that it is necessary for the PFMC to expend too much effort on this problem. The effort within the US albacore fishery is being adjusted through economic realignment. The PFMC has a full plate with salmon, groundfish, and habitat issues, and the recent lack of funding for HMS suggests that the PFMC will be very limited in the HMS process. For the troll albacore fishery we would hope the council will not try to devise regulatory schemes at this time, since doing so may weaken the US position in the international arena.

The albacore fishery is a transpacific fishery and the US is a very minor participant. WFOA was instrumental in calling for a halt to increasing effort in the North Pacific. We did not do so to limit our fishing opportunities, rather to preserve them. The council could best help the albacore resource and US fishermen by limiting its role to supporting the National effort in the international discussions by facilitating data collection and analyses of catch and effort data that can be integrated into the larger process.

WFOA does not feel that it is prudent to pursue any type of effort controls or limited entry through an amendment process for the foreseeable future given the current HMS budgetary constraints and the lack of a pressing need to regulate US effort. All the Council needs to do at this time is offer some ideas relating to the definition of US effort. There are many ways to proceed and NMFS has people skilled in defining these. All that West Coast fishermen are looking for is to preserve our historic portion of the catch which has ranged from 15 to 20%

and to prevent new entrants into the North Pacific resource that could lead to overfishing and diminish the resource and deplete the harvest of the US and other traditional albacore fishing nations.

WFOA believes it is very important for the PFMC to be engaged in North Pacific albacore management, but for the present we believe the council should not get too actively engaged in defining and regulating west coast fishermen. Activities are going on at the National and International level that may negate any council action. Therefore, at this time, we would hope the council would consider limiting activities to data collection and analyses of potential management actions under the various scenarios that may arise out of International discussions. Also, as previously mentioned we feel the problem of IUU vessels in the North Pacific may be more pervasive than previously believed, and we hope the NPFMC would use its position to help halt these destructive fisheries.

U.S. fishermen overall are on the verge of losing their livelihood from a combination of factors. We believe that is no one entity or agency had that as a goal but the cumulative effect over years is having an effect. If this trend continues, U.S. fishermen will not be able to supply processors on shore and their operations will suffer. Port infrastructures are going away from San Diego, CA to Bellingham, WA. Given all these factors, current levels of effort may have been reached many years ago and will never be back.

Sincerely,



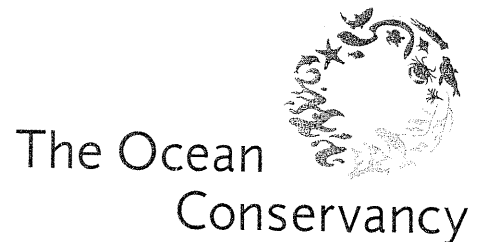
Wayne Heikkila
Executive Director

cc: Don McIssac - Executive Director PFMC
Mark Helvey - NMFS
Michelle Culver - HMSMT -Chair

Received 06/13/06
@ the mtg.

June 6, 2006

Don Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384



RE: Albacore and Bigeye Tuna Management

Dear Chairman Hansen:

On behalf of The Ocean Conservancy and its 170,000 members nationwide, I am writing to express concern regarding the management of Pacific stocks of bigeye and albacore tuna. Particularly troubling is the Pacific Council's failure to adopt domestic management measures to address the overfishing designations made by the international management bodies and the National Marine Fisheries Service (NMFS). Furthermore, fishery managers' classification of reference points established for bigeye and albacore tuna in the highly migratory species (HMS) fishery management plan (FMP), as "theoretical" is not consistent with legal requirements. We recommend that the council establish concrete reference points based on the best available science and take immediate action to end overfishing on albacore and bigeye tuna populations in U.S. waters.

As you are aware, the IATTC and the WCPFC adopted resolutions identifying Pacific albacore populations as experiencing overfishing and requiring member and cooperating non-member nations to "take necessary measures to ensure that the level of fishing effort by their vessels fishing for North Pacific albacore tuna is not increased."¹ Likewise, the first Stock Assessment and Fishery Evaluation (SAFE) Report for the U.S. West Coast HMS FMP warned that "[t]he current fishing mortality rate is high relative to commonly used reference points, and may be cause for concern regarding the current stock status of North Pacific albacore."² The report further cautioned that "if rates of F continue at assumed levels, under most of the scenarios considered within the suite of uncertainty analyses, it is unlikely that the SSB will rebuild to SSB_{MSY} levels within a five-year time horizon."³ To date, NMFS has not yet formally declared

¹ PROP IATTC-73-C1, June 2005

² 2005 HMS Stock Assessment and Fishery Evaluation Report, Section 5.3.1, page 106.

³ *Id.*

The Ocean Conservancy strives to be the world's foremost advocate for the oceans. Through science-based advocacy, research, and public education, we inform, inspire and empower people to speak and act for the oceans.