

Commercial Fishermen of Santa Barbara, Inc.

6 Harbor Way #155, Santa Barbara, CA 93109

May 11, 2006

RECEIVED
MAY 15 2006
PFMC

Ms. Michele Culver, Chair
PFMC Highly Migratory Species
Management Team
WA Dept. Fish & Marine Resources
48 Devonshire Road
Montesano, WA 98563

RE: PFMC CONSIDERATION OF LIMITED ENTRY FOR ALBACORE

Dear Ms. Culver:

Our Association of small boat operators out of Santa Barbara Harbor has many members that have, at various times in the past, fished for albacore as part of a strategy of mixed-fishery practices that must be utilized by small boats up and down the whole coast to make up a year's fishing. In response to the call on the PFMC website to get involved in this issue, we would like to offer a number of points to consider if and when the Council gets around to developing a program addressing limited entry for albacore. Many of our members have albacore fishing experience back to the early 1950s.

First, we would like to note that our members generally believes that a limited entry program for albacore is no longer necessary due to the heavy attrition in the commercial albacore fleet coastwide since the middle of the last century. There used to be over 200 boats in San Diego alone that fished albacore hard in season. Many of these ethnic groups used to range up to Central California and land albacore in Avila Harbor (Port San Luis). You would be hard pressed to go to San Diego now and find 25 boats that still fish albacore, and for the small boat fleet, you couldn't find ten. The San Pedro/Long Beach area had a fleet of very similar size, and there are currently only a handful of commercial albacore boats left, certainly fewer than San Diego, in those harbors now. Moss landing used to have dozens and dozens of albacore trollers; now there's only a third of that mid-century fleet size there. And it's the same way at all of the ports up and down the coast.

We understand that there is concern that the albacore stock may be designated as "fully utilized." We are concerned that landings data alone may not be sufficient to make this determination. We are not aware of fishery independent stock assessments, or analysis of landings data, that have sufficient statistical rigor to make such a determination at this time.

Another issue to consider is that fishing effort is variable for small boats on an annual or decadal scale. the majority of them won't go far offshore or very far up and down the coast to fish albacore, and only fish albacore when the fish show up relatively near their ports.

We would like to see the process, if it happens, work out a limited entry program that doesn't eliminate the historic boats that used to fish albacore but haven't for one reason or another for the last decade or so. A three to five year qualifying window is not supportable, since it excludes a person who may have

made a living in some other fishery in that short time period but will or could fish albacore when they show up, and did so historically as part of a mixed fishery strategy.

Here is an example of what can happen when the management agency doesn't have a complete picture of regional events and selects an arbitrarily short time window for qualifying vessels for limited entry. When the Groundfish Management Plan decided limited entry was to be developed, it set a qualifying time window in the mid 1980s that was very short. As it turns out, the groundfish boats out of Santa Barbara and Ventura Harbors, who would have qualified under the tonnage limits set, were prohibited from fishing their usual and customary grounds in the Santa Barbara Channel due to the rapid influx of geophysical survey vessels exploring for oil in the region in that same time period. The Minerals Management Service Environmental Studies Division did a half-million dollar research study that proved that when seismic survey boats pound the water with their noisemakers, groundfish catches go down. The 2-mile long cables drawn by the survey boats also had Coast Guard rules-of-the-road precedence over trawlers, so our traditional trawl fishery for rockfish was curtailed during the exact time period that the Council set for qualifying for "A" permits. Even some of the well-known "highliner" groundfish trawlers in the Santa Barbara Channel ended up not qualifying for A-permits, but it was an artifact of the short qualifying time window.

This year, and for the unforeseeable future, one of the "cuts" is clearly going to be fuel prices: ranging far offshore for albacore is going to be an economically dicey move with fuel prices in many harbors above \$3 and approaching \$3.50 in some of our ports. One difference between CPFV and commercial fishing is that the former can put a dayrate surcharge on their trips, passing the costs through. But commercial fishing operations depend on ex-vessel price, which will not reflect fuel prices directly. This fuel cost issue is going to be a "natural" limit on albacore fishing for the foreseeable future.

Another question to consider is "what is 'albacore history?'" Just tonnage in past history? Huge tonnage should not be a paramount driving criterion. Small boats may only land a several or a dozen tons a year, but may sell them for fresh local markets as opposed to canning, and these practices should not be cut out of the fishery without deliberate consideration of the mix of boats the Council would like to see in a sustainable fishery for the future.

It is well known, also, that launching a limited entry program often creates a run on permits. Last year, a series of port meetings were conducted by the SW Region of NMFS regarding the need to include albacore on the highly migratory permit. This resulted in apparent increases in albacore notations on the HMS permit, but is unclear whether or not fishermen were just doing this in response to the potential of getting shut out of yet another fishery, or really planned to go fish albacore. This issue ties in with what now-deceased Capt. Ralph Hazard said long ago about issues affecting fishermen: the "death of a thousand cuts" syndrome. Any one thing that happens (seismic surveys, oil platforms in fishing grounds, stricter quotas, further gear restrictions, market price drops, foreign fleet competition, etc.) by itself is not going to drive a small commercial fishing vessel operator out of business. But taken all together it is clear that small boat fishing operations, the "mom and pop" local boats that sustained local fresh fish in harbors up and down the coast, are in fact going out of business at a fair clip. This may be nowhere more acute than in Morro Bay Harbor, where buybacks both Federal and private of groundfish permits, the draconian salmon season, and other recent changes have driven most of the infrastructure right out of the harbor.

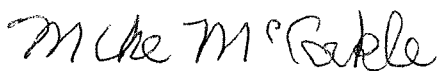
Equity among albacore user groups: we have not heard proposals or discussion of limiting the number of fishermen in private sportfishing vessels, even though there may be consideration of putting a limit on catch per day. To get a handle on a "fully utilized" stock (if albacore is, in the first place), overall fishing effort must be identified and equitably handled. That includes commercial fishing vessels, commercial passenger fishing vessels, and private party albacore sportfishers alike. Rumor has it that CPFV (and private sportfishing boats) take roughly a third of the annual harvest, so this equity issue is not trivial.

In general, socioeconomic issues have not been well-addressed in past limited entry programs: concentration of permit and quota capacity and the range of fishing vessel sizes are two issues that come to mind. In this instance, should a limited entry program for albacore become a reality, it is very important that social and economic equity issues be thoroughly understood and addressed. This is true because, as a number of ocean conservation groups have worried, this is the last open access fishery. As noted above, small boat operations must have a flexible schedule of fishing to maintain an annual income; we don't catch all our fish in a few months of hard fishing, but try to keep the boat working year 'round. The loss of access to a large number of options for small boats to keep fishing month-to-month has led to serious economic consequences already, and a limited entry albacore fishery would be another "cut" in the slow death commercial fishing ports and harbors are experiencing coastwide.

Finally, the Management Team and Council should look at the cumulative effect of this proposal on top of all other recent limited entry programs, marine protected area closures, and Groundfish EFH closures on the actual infrastructure of coastal ports and harbors. The fabric of coastal economies is unraveling, and is becoming painfully evident in areas such as Morro Bay. Rumor has it that NGO buyout programs are expanding to other ports such as Half Moon Bay, another historically important albacore harbor, and this cumulative impact to port infrastructure should be a serious consideration in the Council deliberations on making albacore a limited entry fishery on little statistical rigor.

Thank you for the opportunity to provide these thoughts on the albacore fishery. We remain committed to working with you, your Management Team, and the Council throughout the deliberations on this albacore limited entry initiative. If you have questions or comments regarding any of the above information, please don't hesitate to contact us. Capt. Mike McCorkle has agreed to serve as our appointed albacore liaison to the process. He can be reached at (805) 886-4239 or via email at mccorkle@cox.net.

Sincerely,



MIKE M^CCORKLE

c: Dr. Don McIsaacs, Exec. Dir., PFMC
Mr. Don Hansen, President, PFMC
Mr. Wayne Heikkila, PFMC HMS Advisory Subpanel

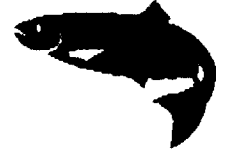
HUMBOLDT FISHERMEN'S MARKETING ASSOCIATION, INC.

3 Commercial Street
Eureka, California 95501-0241



(707) 443-0537

FAX (707) 443-1724



May 23, 2006

Ms. Michele Culver, Chair
PFMC Highly Migratory Species Management Team
WA Department of Fish & Marine Resources
48 Devonshire Road
Montesano, WA 98563

RECEIVED

MAY 24 2006

PFMC

RE: PFMC Consideration of Limited Entry For Albacore

Dear Ms. Culver:

Humboldt Fishermen's Marketing Association represents nearly 100 small boat fishermen based in Eureka, California. Many of these fishermen have in past years fished albacore when their "main fishery" was in a down cycle. Several of our members have fished albacore as far back as the 1960's.

For a number of reasons the members of HFMA do not believe that a limited entry program for albacore is necessary. One of these reasons is the fact that our fleet is aging and getting out of commercial fishing. I can only think of 10 members in our organization under 50 years of age. Attrition alone will pare the fleet down.

Many of our members fish albacore only when the fish come within 100 miles of Humboldt Bay. These are smaller boats that cannot range up and down the coast or far offshore, consequently they may only get to fish albacore one out of five years. These smaller boats are not likely to take a significant percentage of the coastal albacore in any given year. However, the freedom to catch a few ton as necessary is essential to their survival.

Eureka frequently has had the unfortunate distinction of having the highest fuel price in the nation. In 2006 this factor alone will naturally limit the fleet since fewer people will venture out to prospect for fish. The ex-vessel price of albacore has certainly not kept up with the rate of increase in the price of fuel.

Ms. Michele Culver

Page 2

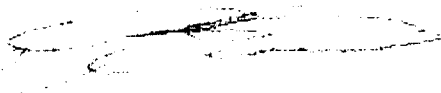
May 23, 2006

The U.S. Fishermen only produce 5-7% of the worlds albacore catch. Total elimination of the U.S. Fleet would not have a noticeable effect on the resource.

In the recent past nearly all of the federal limited entry plans have cut the small boat fishermen out of the various fisheries up and down the coast. The pelagic wetfish limited entry plan is an excellent example. While over 400 fishermen from Washington to San Diego had legitimate round haul landings of anchovies and sardines, only 70 permits were issued for this fishery in spite of the fact that small boat fishermen consistently sold their limited catch for many times the amount per ton of the "large producers". They not only received more for their catch but incidental catch and mortality was minimal compared to larger boats. The net result of many of these limited entry plans is to put increasing pressure on other coastal fisheries, especially in poor fishing years.

In closing, we would like to thank you for the opportunity to provide industry input on the albacore fishery.

Sincerely,



Aaron Newman, President
Humboldt Fishermen's Marketing Association

cc: Dr. Don McIsaacs, Exec. Dir., PFMC
Mr. Don Hansen, President, PFMC
Mr. Wayne Heikkila, PFMC HMS Advisory Subpanel