

AMERICAN ALBACORE FISHING ASSOCIATION

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March 25, 2007

Dr. Donald McIsaac
Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Re: U.S. North Pacific Albacore Fishing Effort Characterization

Dear Dr. McIsaac,

I am writing on behalf of the American Albacore Fishing Association (AAFA), a nonprofit corporation of over two dozen American commercial fishing vessels that participate in the troll and/or pole & line North Pacific albacore fishery,¹ to express our support for the Council's efforts to characterize albacore fishing effort in accordance with IATTC Resolution C-05-02.²

AAFA acknowledges and supports the Council's efforts to develop the information necessary to characterize current U.S. fishing effort for North Pacific albacore. In addition, we appreciate the efforts of the HMS Management Team and Advisory Subpanel toward such goal and, more particularly, express our support for the "*effort band*" concept being developed and refined through the Southwest Fisheries Science Center (SWFSC).

We urge the Council to adopt for public review, the SWFSC's "*effort band*" characterization of historical U.S. North Pacific albacore fishing effort.

Our collective experience, through decades of fishing albacore off the West Coast, has shown us that factors other than mere abundance of fish can play significant roles in the

¹ AAFA is founded upon the belief that, by promoting the environmental benefits of the troll and/or pole & line fisheries and promoting the health benefits of tuna consumption, the economic viability of these traditional troll and/or pole & line fisheries can be sustained.

² In IATTC Resolution C-05-02, the member countries agreed to ensure that the total level of fishing effort for North Pacific albacore tuna in the Eastern Pacific Ocean not be increased beyond current levels, and to take necessary measures to ensure that the level of fishing effort by their vessels fishing for North Pacific albacore tuna is not increased;

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determination of effort and catch. We believe that a well-derived and appropriately defined “*effort band*” would allow for accepted fishery variations due to market conditions, weather, gear type, and other conditions and variables.

In order to prevent the upper level of such an “*effort band*” from becoming an annual target for the fishery, any unused “effort” should be allowed to accrue to subsequent years. This practice would eliminate any effort “race” and should ensure future effort levels in accordance with historical effort.

AAFA has attended a number of Council, HMS Management Team, and HMS Advisory Subpanel meetings and actively participated in the discussion of management measures in efforts to ensure the long term sustainability of the North Pacific albacore stock.

I believe that continued efforts in compliance with the IATTC Resolution C-05-02, and the development of appropriate fishery management measures, are essential to protecting North Pacific albacore stock and the long standing tradition of albacore fishing that our members continue today.

I greatly appreciate having the opportunity to comment on this matter. If you have any questions or would like to discuss this matter further, please do not hesitate to contact me at (619) 941-2307.

Sincerely,

/Jack Webster/

Jack Webster, F/V Millie G.

AAFA president