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PETER H. FLOURNOY

May 29, 2008

Mr. Donald K. Hansen
Chair, Pacific Fishery Management Council
7700 NE Ambassador Place, Ste. 101
Portland, Oregon 97220-1384

Re: Rodney R. McInnis Letter to Council of May 21, 2009

Dear Don:

I am writing you on behalf of the Western Fishboat Owner's Association and the American Fishermen's Research Foundation. We were surprised and concerned over Dr. McInnis's letter suggesting that NOAA Fisheries was going to produce a report for the Council's consideration concerning potential management options for the North Pacific albacore fishery, with a Fall completion date. It is our understanding that this will be done under a consulting contract, I would assume out of the Region's budget for this fiscal year. We believe this is a waste of money and resources at a time when there are many more worthwhile projects concerning HMAS fisheries which remain undone for want of funding. While we realize that the budgets of the Council, the Region and the Science Center are separate, we are aware that in the past the Region has contributed to the HMS budget for the Council. Given the obviously ill effects of the present HMS workload on at least one member of the Council staff, to the point of threatening his health, we believe this money could be better spent by the Council or the Science Center.

We are even more amazed and confused with the statement in the same letter that "NOAA Fisheries believes that the Council should begin considering possible management controls to *insure that future catch and effort does indeed remain within the bounds of the historical fishing effort. (Emphasis added)* It is not that NOAA Fisheries is somehow uninformed, since earlier in the letter Dr. McInnis acknowledges the ISC report that the spawning biomass is the second highest in the known history of the fishery, as well as the information that the albacore fleet is not increasing now and has been stable through out the 1996-2005 time

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period as reported by the PFMC HMS-MT.

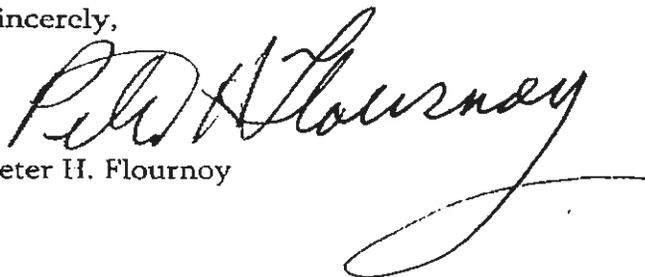
NOAA Fisheries is also aware, although the Council may not be, that the SWFSC is so understaffed and underfunded that it took it 3 years to analyze data collected from albacore archive tags (a project which AFRF supported). The Center is apparently still unable to correlate the albacore logbooks in a timely manner. These logbooks have been mandatory since the approval of the HMS-FMP in 2005. We believe these are at least two tasks which should receive adequate funding before NOAA-Fisheries embarks on studies that may prove at best out of date when they are needed, and at worst totally unnecessary.

Indeed, the Council is aware of the repeated delays in processing EFPs due to either the Region's or the Science Center's lack of resources in both personnel and funding. I would also assume that the Council is aware of the lack of promotion and support given by NOAA-Fisheries to its website which gives the public information on the sustainability of various fish species. This has encouraged a plethora of private organizations such as MSC and Greenpeace to set up their own criteria for sustainability and permitted them to mis-characterize many fisheries over which the Council has jurisdiction, much to the detriment and frustration of the Council's constituents, and I believe of the Council as well.

The list of desperately needed research into the life history of many HMS species including albacore that is not being done due to the lack of funding and personnel is too long to repeat here. I would urge the Council to review pages 30 and 31, Section 5.2.1 of Agenda Item C.3.a, Attachment 1, Research and Data Needs 2008 for the short list of *high priority* items. We believe "management options" should be based on science, not merely the best scientific information available when that is inadequate because of inadequate funding.

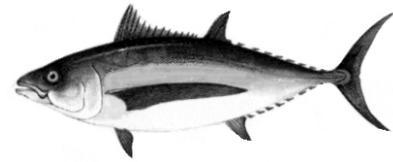
I would suggest the Council write a strong letter to Dr. McInnis, and if appropriate to Dr. Balsiger, to discourage projects such as that suggested in the May 21, 2008 letter which are unwarranted and wasteful, and at the same time encourage greater funding for the SWFSC and the Region to pursue some of the projects and goals which I have listed above.

Sincerely,



Peter H. Flournoy

WESTERN FISHBOAT OWNERS ASSOCIATION[©]



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May 28, 2008

Mr. Don Hansen
Chair, Pacific Fisheries Management Council
7700 NE Ambassador Place, Ste. 101
Portland, OR 97220-1384

Re: Rodney McInnis May 21, 2008 Letter to the PFMC

Dear Chairman Hansen:

Western Fishboat Owners Association is extremely concerned over the unexpected letter that Rod McInnis wrote to the PFMC on May 21, 2008. The letter requested that the PFMC address management of the commercial albacore fishery with "vigor." Mr. McInnis cites the establishment of daily bag limits on albacore in the recreational fishery as one reason to pursue management of albacore.

The letter does state that NOAA Fisheries sees no increase in the albacore effort and has been stable from 1996. Thus, the haste to act unilaterally based on a presumption that fishing effort is high internationally is troubling. If fishing effort is the problem internationally, and the U.S. effort is stable, then why are we in such a rush?

Right now salmon and albacore trollers are hammered by the management regimes, and now getting further marginalized arbitrarily.

The NMFS position is a double whack; especially since it was WFOA that asked for control limits on Asian fleets moving to the Eastern Pacific! WFOA and AFRF representatives discussed all of the problems of this approach with Dr. Bill Fox while he was at the SWFSC, and have also discussed this with representatives of the SWRO. We thought we had made clear to NOAA that the potential problem was not with the U.S. albacore fleet but with foreign entry. We feel this coming from NOAA/NMFS at this time is extremely troubling to the U.S. albacore industry.

The idea of effort stabilization in the commercial fleet is a valid discussion at some point if conditions warrant and other nations are acting in the same manner. However, and most troubling is why NOAA Fisheries suddenly sent this letter to the council with no consultations

with groups such as ours. WFOA has worked with NOAA/NMFS on many management & regulatory issues. American Fishermen's Research Foundation (AFRF), also has a 37-year history of cooperative research with NOAA/NMFS. Therefore you can understand our shock when we are blindsided by this type of initiative.

The U.S. west coast albacore industry hopes that the PFMC will advise NOAA Fisheries that the current management system is adequate to manage the U.S. troll fishery at this time. WFOA strongly urges the PFMC to reject this request by NOAA Fisheries.

Sincerely,

Wayne Heikkila
Executive Director

cc: Don McIsaac - PFMC Executive Director
Rod McInnis - NOAA/NMFS
Mark Helvey - NOAA/NMFS