



AMERICAN ALBACORE FISHING ASSOCIATION
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JUL 29 2013
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Mr. Dan Wolford, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

PFMC
PFMC

Re: AAFA Paper on Biological Reference Points and Harvest Control Rules

Dear Chairman Wolford and Council members:

The American Albacore Fishing Association (AAFA) represents U.S. fishermen and vessels responsible for a sizeable portion of the U.S. harvest of albacore from the North and South Pacific. AAFA was the first tuna fishery in the world to be certified sustainable by the Marine Stewardship Council.

With continued support for effective international management of Pacific albacore, AAFA support the development of appropriate target and limit biological reference points, as well as efforts to identify scientifically sound harvest control rules.

Accompanying this letter please find a position paper from AAFA on this subject.

Sincerely,

Steve Moore
Board Member
American Albacore Fishing Association



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June 11, 2013

Guillermo A. Compeán
Inter-American Tropical Tuna Commission
8901 La Jolla Shores Drive
La Jolla, CA 92037-1508, USA
Fax: 585-5467133
info@iattc.org

Re: Position on Harvest Control Rules / BRP's Albacore Tuna

Dear Mr. Compeán,

American Albacore Fishing Association, AAFA was the first tuna fishery in the world to achieve MSC certification. In 2012, AAFA was the first tuna fishery in the world to achieve re-certification. The re-certification requirement is as follows:

AAFA will work actively through the PFMFC (and the US delegations to the IATTC and WCPFC to promote the development and determination of appropriate target and limit reference points (or measures or surrogates with similar intent or outcome) for the North Pacific albacore tuna stock. These efforts will be aligned with AAFA's support for appropriate measures to increase compliance with conservation and management measures of the appropriate RFMOs.

American Albacore Fishing Association (AAFA) supports the development of target and limit reference points and is very supportive of the IATTC's scientific staff's initial steps in this direction.

American Albacore Fishing Association (AAFA) supports the establishment of scientifically based harvest control rules for all tunas. AAFA is also supportive of the development of collaborative research programs with the harvesters. AAFA feels collaborative research programs with the harvesters will promote accurate assessments, which are critical for harvest control rules.

While the American Albacore Fishing Association fully and actively supports the IATTC's scientific staff's early development of harvest control rules, we have certain concerns, both IATTC and WCPFC, BRPs and HCRs, when agreed upon, are the same across the entire Pacific. If it is not possible to achieve consensus on the same points and rules, they compliment each other and are not in conflict.

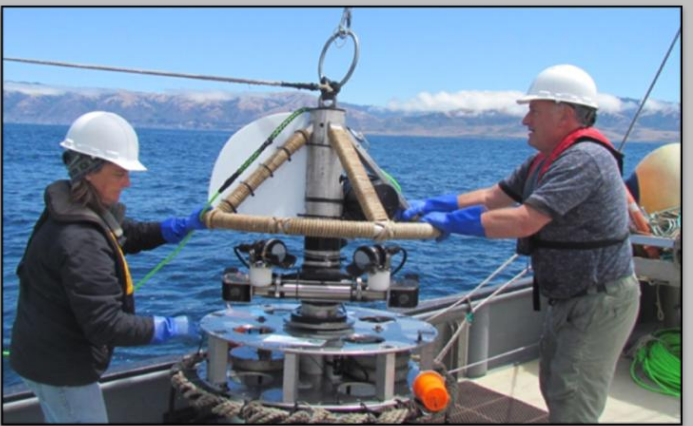
In conclusion, AAFA would like to compliment the IATTC on this progress and we look forward to promoting, through our efforts as members of the U.S. delegation and through the status as an IATTC Observer.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Natalie Webster', with a stylized, cursive script.

Natalie Webster
Director of Operations
American Albacore Fishing Association

Cc: Ed Stockwell - U.S. Commissioner
Don Hansen - U.S. Commissioner
Rod McInnis - U.S. Commissioner
Bill Fox - U.S. Commissioner
Dave Hogan - U.S. Department of State



California Central Coast RCA Study

EFP Applicant:
Central Coast Sustainable
Groundfish Association
[now Central CA Seafood
Marketing Association]

California Risk Pool

FORT BRAGG – CENTRAL COAST RISK POOL ANNUAL SUMMARY REPORT 2012



Report prepared by: Kate Labrecq^{*} and Danyne Obenhoff[†]

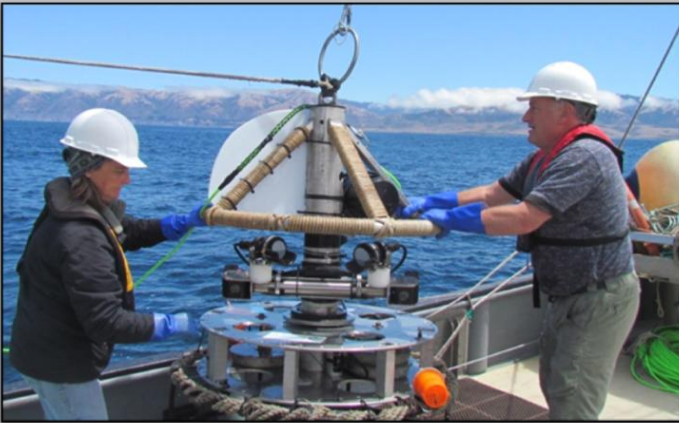
Fort Bragg Groundfish Association
A California Fish Marketing Act Corporation
Central Coast Sustainable Groundfish Association
(Now: Central California Seafood Marketing Association)
A California Fish Marketing Act Corporation
The Nature Conservancy
A District of Columbia Non-profit Corporation

March 2013

^{*} The Nature Conservancy

[†] Ecological Asset Management, LLC

- Minimize OFS encounters
- Maximize target harvest
- Avoid sensitive habitat
- Contribute to rebuilding stocks



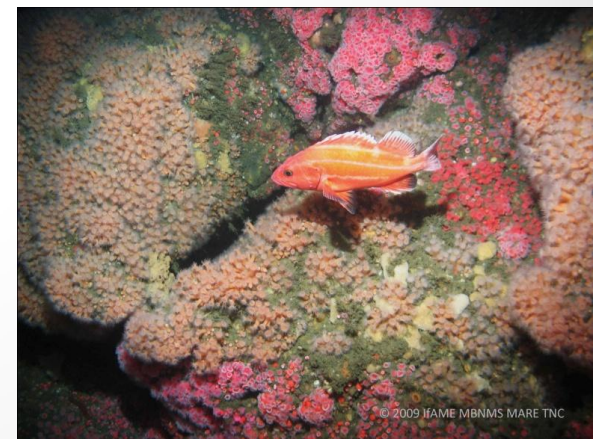
California Central Coast RCA Study

Project Partners: TNC, MLML /
California Sea Grant, NMFS/SWFSC,
EDF, CCSGA/CCSMA, local fishermen,
UCSB

EFP Applicant: Central CA Seafood
Marketing Association

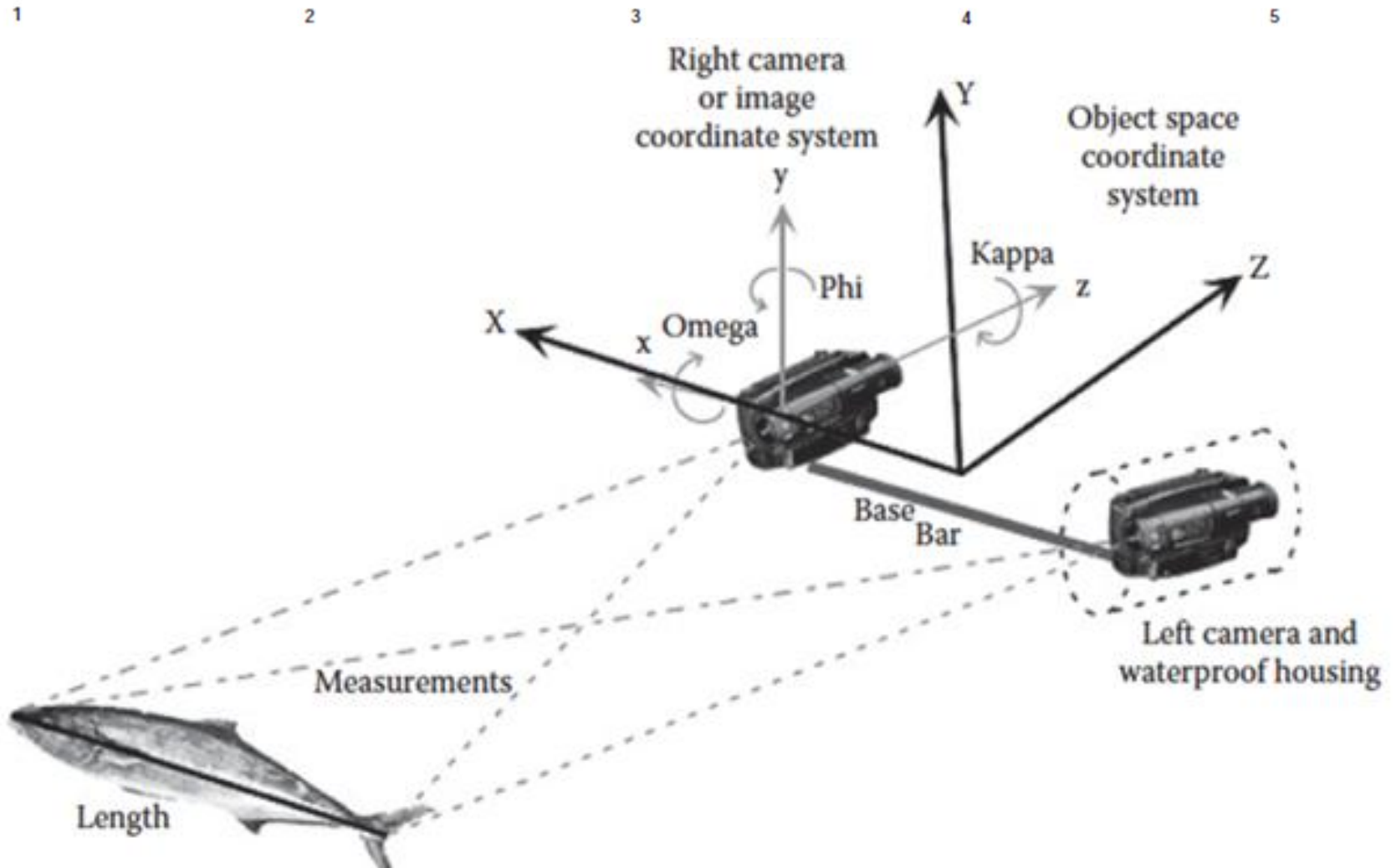
Study Elements

- Mapping predicted OFS distributions based on existing fisheries data
 - FRAM Trawl Survey, AK Science Center trawl survey, CPFV catch data
- Visual surveys inside the RCA using video system
- Directed fishing inside the RCA
 - vertical hook and line gear - target abundant species



Progress to date..

Bocaccio Catch Per Unit Effort Prediction



Broader Project Goals

- Build better maps of OFS distribution utilizing available data, local knowledge, and ground-truthing through field surveys
- Better inform both fishing opportunities (eg. targeting chilis and avoiding bycatch) and management decisions (eg. RCA re-configuration)



Proposal to the Pacific Fishery Management Council to Modify Groundfish EFH Designation, Conservation, and Enforcement **Comprehensive Conservation Proposal**



PFMC Agenda Item B.1 Open Public Comment
September 12, 2013



New Information & an Ongoing Requirement

- Significant new data on shape and distribution of hard rock and mixed reefs
- Numerous new coral and sponge observations
- New coral and sponge bycatch data
- New fish-biogenic habitat studies
- New quantitative data on groundfish prey
- Changes in fishing fleet
- New bottom trawl fishing effort and Oregon shrimp trawl effort data
- New trawl impact studies



Proposal Overview

Conservation Areas

- Establish 66 new and/or modified EFH Conservation Areas prohibiting non-tribal bottom trawling (p 24, 43-77 and appendices)
- Open 9 areas currently closed to bottom trawling off California (same)

Designation

- Addition of all waters deeper than 3,500 meters as groundfish EFH (p 31)
- Identification of 31 major prey taxa as EFH components (p 34)

Gear Regulation Changes

- Restrict bottom contact by midwater trawl gear when operating inside EFH Conservation Areas (p 31)

Enforcement

- Increase VMS ping rates, hydraulic sensors, depth sensors, and utilize electronic logbooks (p 39)

Proposal Objectives

Protect EFH for full suite of Pacific Coast Groundfish while maintaining vibrant fisheries and communities

- Known sensitive habitat features to bottom trawl impacts (hard substrates, biogenic habitats, submarine canyons, ridges, banks, escarpments);
- High regional coral and sponge bycatch;
- Ecologically important habitats within or adjacent to trawl RCA;
- Areas that are currently subject to very low or no trawl effort that may contain sensitive habitats;

Objectives Continued...

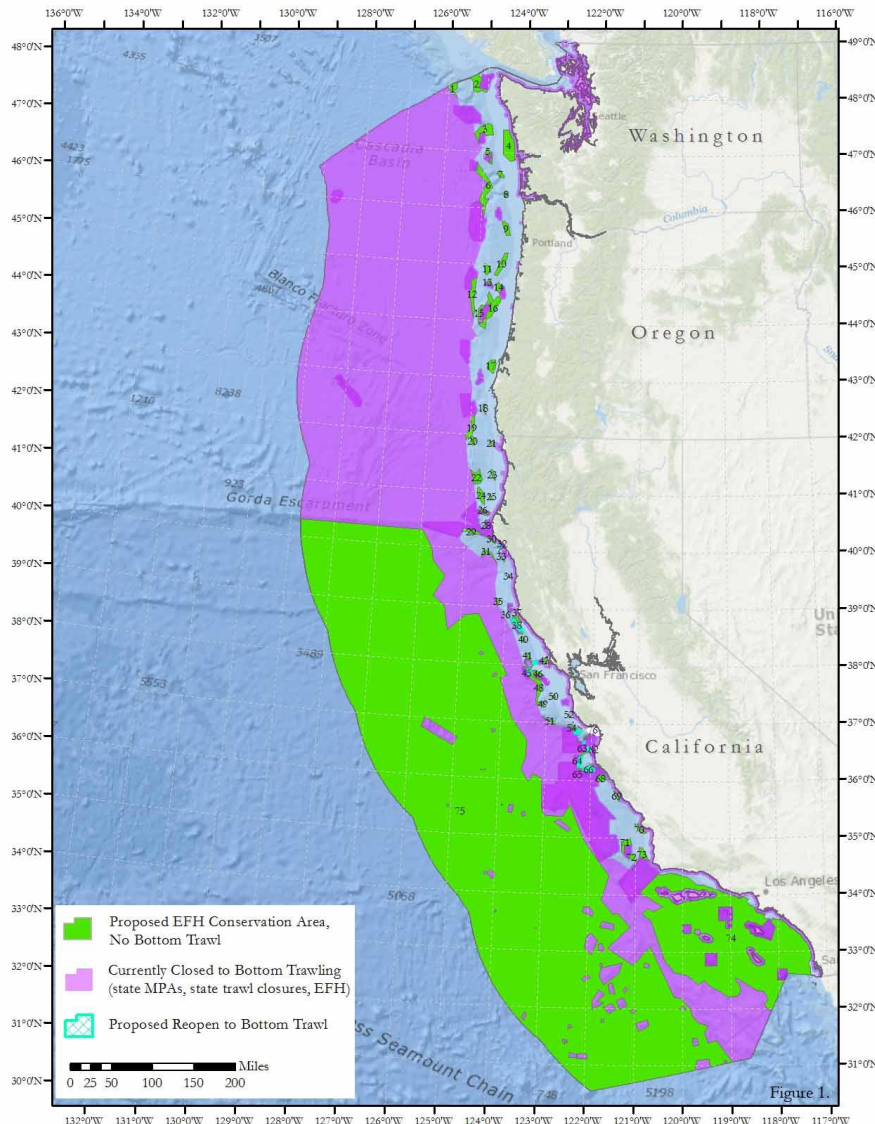
- Achieve conservation targets with minimal cost to the fishing industry/ maintain key fishing areas/ minimize displaced trawl effort;
- Improve the spatial resolution of enforcement of EFH Conservation Areas;
- Ensure all EFH Conservation Areas protected from mobile bottom contact – midwater trawl gear.
- Improve information base of major groundfish prey

Collaboration/Outreach

- Quinault, Quileute, Hoh and Makah Tribes
- State Agencies:
 - Washington Department of Fish and Wildlife
 - Oregon Department of Fish and Game,
 - Oregon Governor's Natural Resources Office
 - California Department of Fish and Wildlife
- Fishermen/Industry Representatives in: Santa Barbara, Morro Bay, Monterey/ Moss Landing, Half Moon Bay, San Francisco, Fort Bragg, CA Risk Pool, Newport, Coos Bay, Oregon Trawl Commission.
- Sanctuaries – OCNMS, MBNMS, GFNMS, CBNMS, CINMS, WCR
- Academic scientists
- Enforcement
- NOAA Deep-Sea Coral Research and Technology Program
- National Marine Fisheries Service
- NGOs



EFH Conservation Areas



66 new/ modified areas
(143,974 miles squared)

Washington ~ 1, 000 miles²

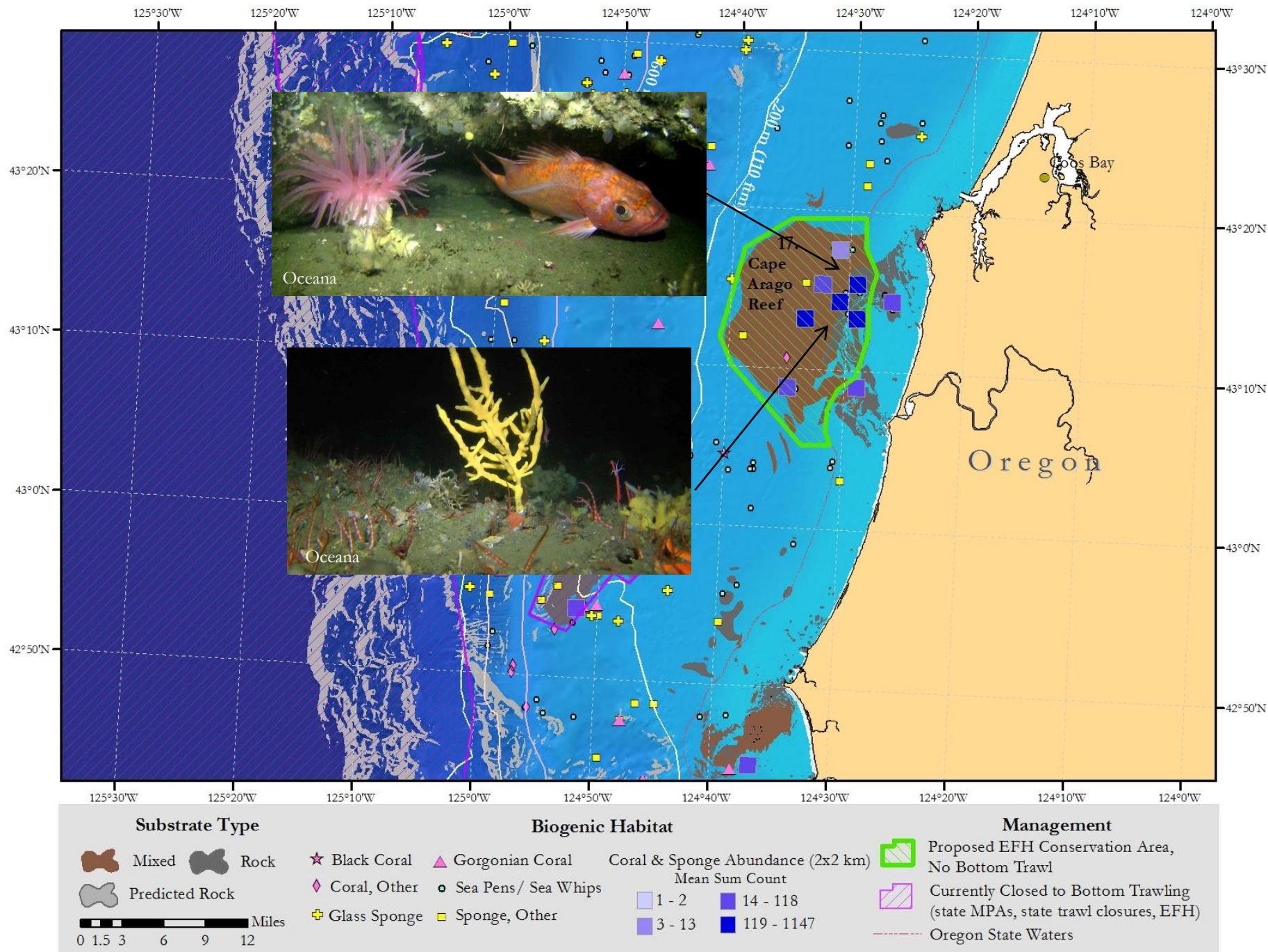
Oregon ~ 1,600 miles²

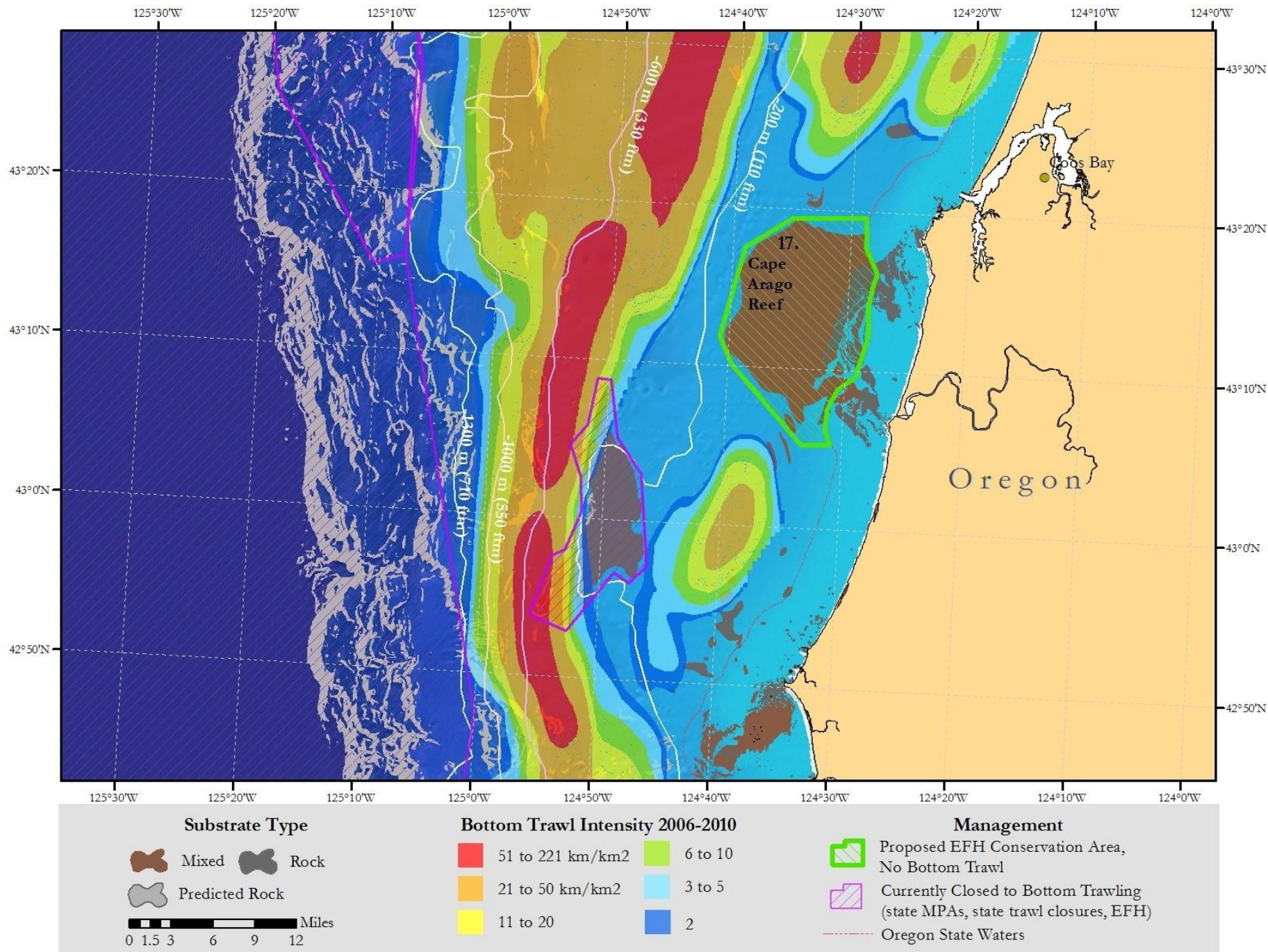
California ~ 18,000 miles²

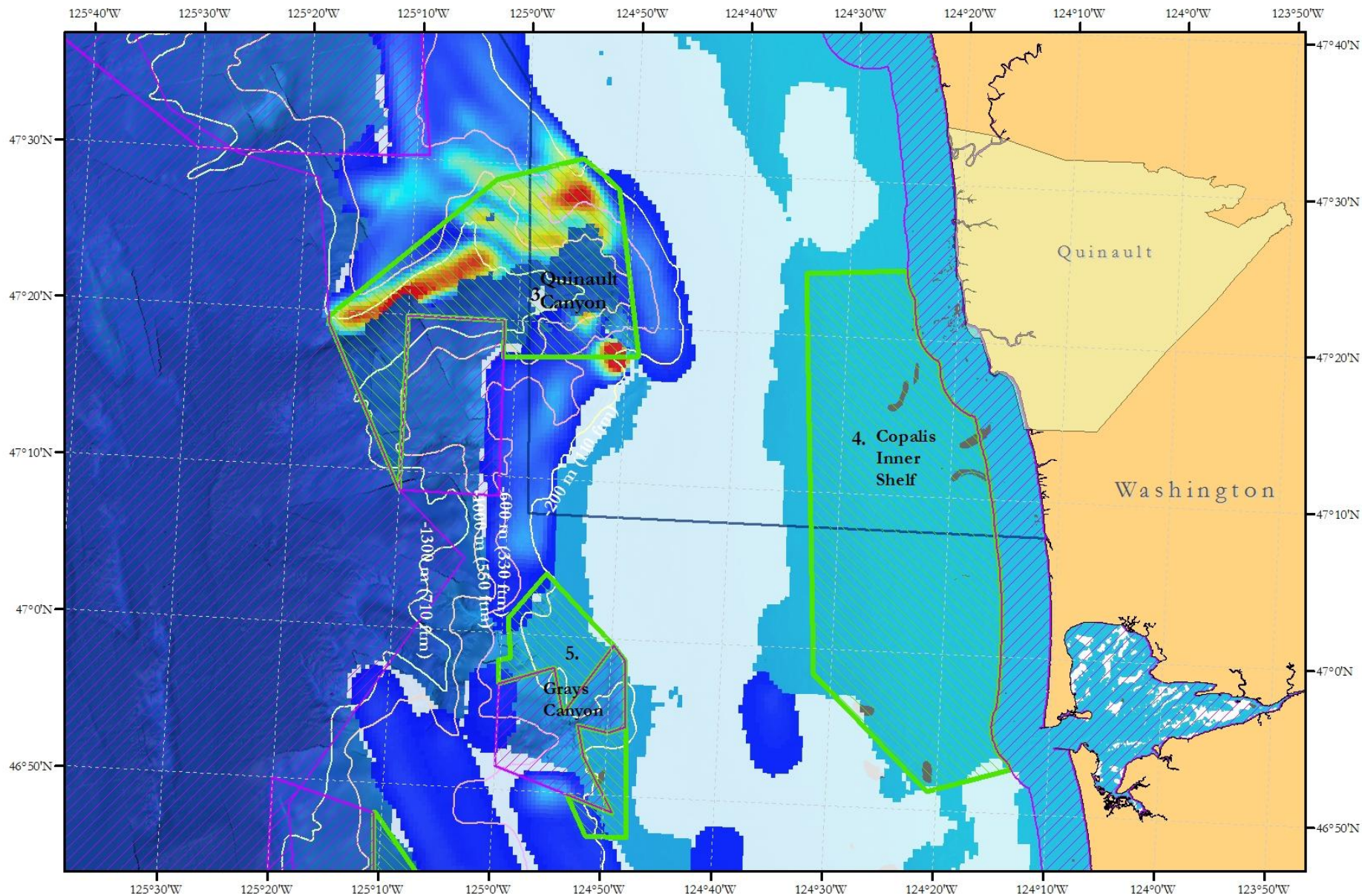
Deep-water Footprint ~
123,000 miles²

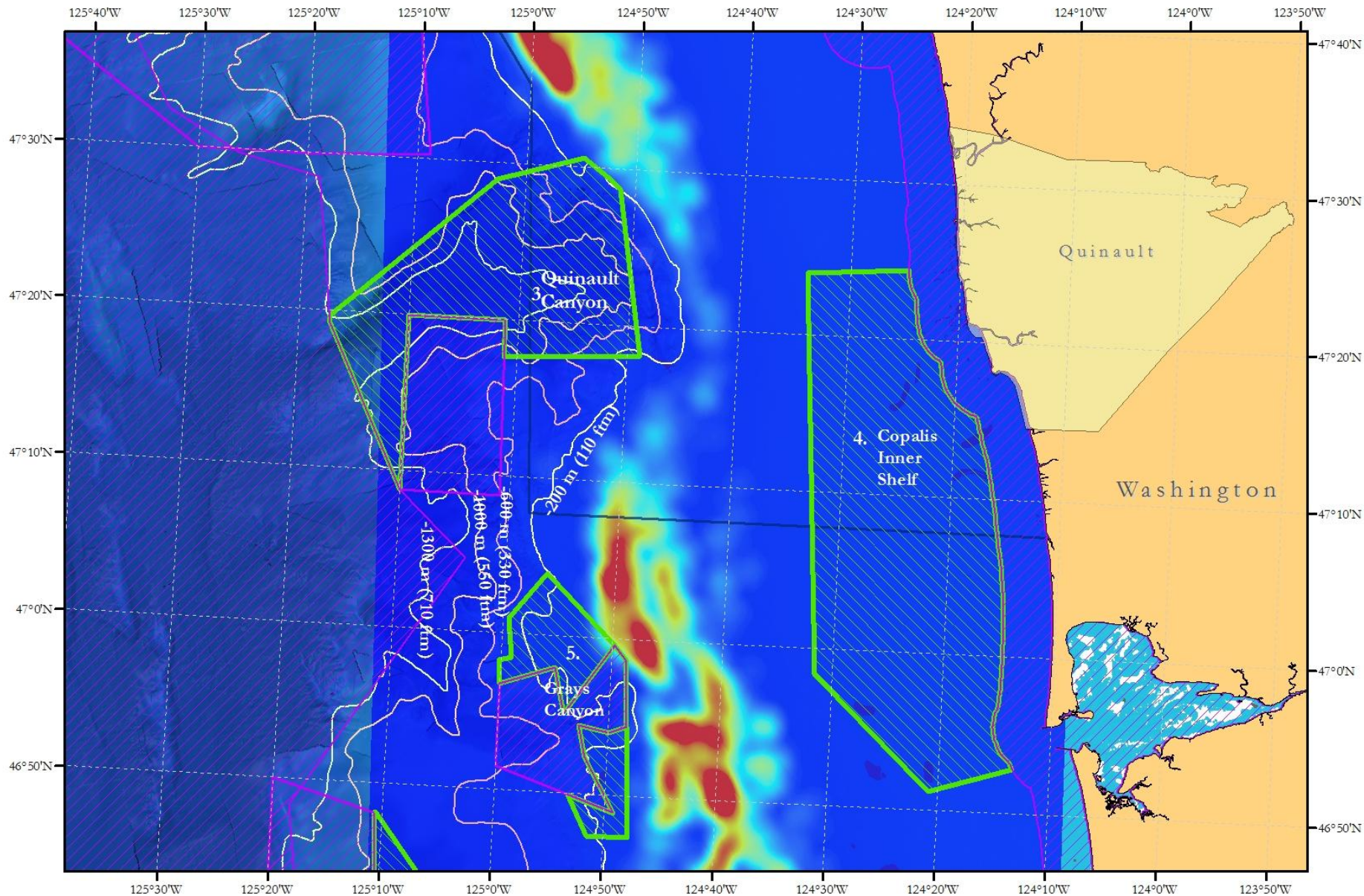
9 open areas (~170 miles
squared)

One concept 'open area' –
Monterey Bay State waters









Substrate Type



0 1.5 3 6 9 12 Miles

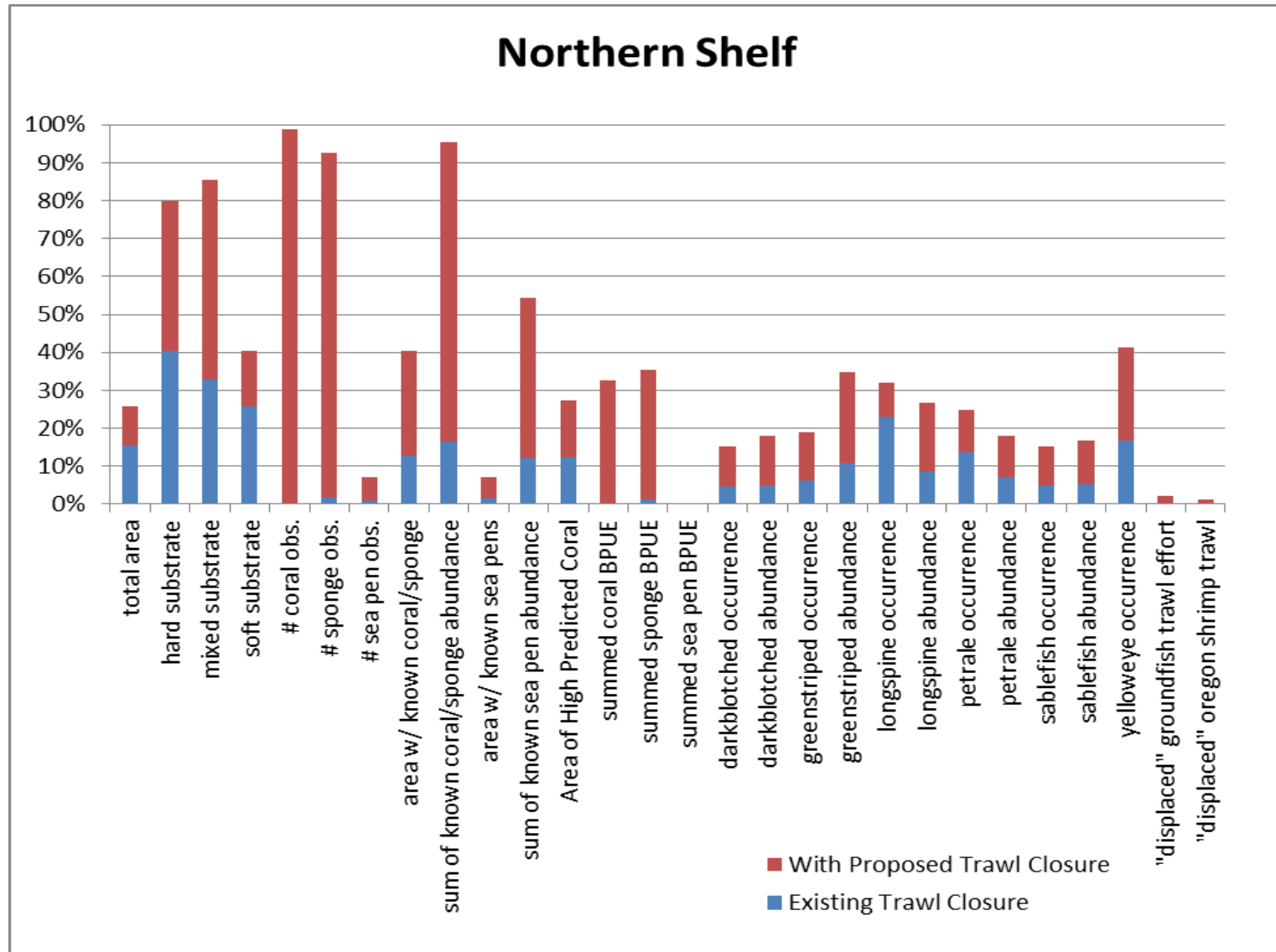
Oregon Shrimp Trawl Effort (hours fished) 2007-2011



Management

- Proposed EFH Conservation Area, No Bottom Trawl
- Currently Closed to Bottom Trawling (state MPAs, state trawl closures, EFH)
- National Marine Sanctuary

Proposal Analysis (Example)



Pacific Expedition
August 2013
North-Central Oregon Coast

