

March 18, 2010

Attn: Natalie Webster
AMERICAN ALBACORE FISHING ASSOCIATION
4252 Bonita Road, #154
Bonita, CA 91902

Re.: Report on Meeting of HMS Management Team, February 23-25, 2010

Dear Natalie and all AAFA members:

I recently attended and represented AAFA fishermen's interests at the interim meetings of the Highly Migratory Species - Management Team (HMS-MT). The meetings were held at the Southwest Fisheries Science Center (SWFSC) in La Jolla, California.

A number of issues were discussed at the meetings and some were more important to albacore fishermen than others. In the following paragraphs, I present the issues that are most relevant to U.S. albacore fishermen.

Fishery Management Plan (FMP) Amendment 2 and National Standard 1 (NS1) Guidelines: Annual Catch Limits (ACLs) & Accountability Measures (AMs):

The Pacific Fishery Management Council (PFMC) has been working to developing a FMP amendment to address the revised NS1 guidelines. These revised NS1 guidelines call for establishment of Annual Catch Limits and Accountability Measures. However, the NS1 guidelines contain an "*international exception*" to these requirements. This exception applies to "*stocks or stock complexes subject to management under an international agreement*"; this exception is interpreted to apply to albacore.

As a result of this international exception, ACLs and AMs are not required for albacore. But the revised NS1 guidelines still require the Council to determine the Maximum Sustainable Yield (MSY) and Status Determination Criteria (SDCs) for albacore as a "*management unit species.*"

One of the Management Team's tasks for this meeting was to develop alternative reference points for species (like albacore) that fall under the international exception. The FMP provides some general guidance, but the NS1 guidelines call for establishing a number of new reference points.

AMERICAN ALBACORE FISHING ASSOCIATION

Re: Report on Meeting of HMS Management Team, February 23-25, 2010

(Continued)

There was discussion of the new Over-Fishing Limit (OFL) guideline that has to be established. The OFL is roughly similar to the value of fishery mortality (F) that occurs at maximum sustainable yield (MSY).

I expressed the importance that any OFL to be considered should be a “stock-wide” limit and not one that would apply only to the U.S. fishery. I emphasized that albacore is a pelagic fishery. As such, it is essential that albacore be managed effectively at the international level. It is unacceptable to expect the U.S. fishery to sacrifice itself while other fleets take no action. Responsible management must proceed at the international level and the U.S. is encouraged to advance the necessary discussions.

Even the albacore “white paper” recognized this fact:

“Applying a limited access fisheries management program to the U.S. west coast albacore fishery could result in short term and potentially long-term benefits to the fishery... However, the full effect on the albacore resource would not be realized until the other Nations harvesting North Pacific albacore stock put management actions in place to keep excess capacity curbed.”

These issues were discussed and it seemed likely that the Council would adopt the Biological Reference Points (BRPs) established by the IATTC and WCPFC. Currently, an “*interim reference point*” has been established, but it is unclear whether that reference point is to be considered a “*target*” or a “*limit*” value. Simply put, a “*target*” is something you aim for. A “*limit*” is something you do not exceed.

The agreed upon reference point for albacore is a level that represents the average of the 10 lowest years of Spawning Stock Biomass (SSB). The idea is that the stock should not go below, or be allowed to remain below, that level.

Consideration of a New Control Date:

The Management Team turned its attention to the issue of establishing a new control date. This action was proposed by WFOA to the Advisory Subpanel at the previous Council meeting. None of the Subpanel supported the proposal. I questioned the motivation for such a proposal, particularly when there had been no mention of how, or even if, this would benefit U.S. fishermen.

Regardless, Council Member Rod Moore questioned Wayne Heikkila (WFOA) about the desirability of a new control date during the Council meeting and requested it be added to the agenda for the April Council meeting in order that action could be taken before the start of the 2010 fishing season.

AMERICAN ALBACORE FISHING ASSOCIATION

Re: Report on Meeting of HMS Management Team, February 23-25, 2010

(Continued)

Other Council Members expressed a number of questions over this course of action. There was particular concern over the lack of factual and economic data to support such action by the Council.

The Management Team considered the challenges in providing the Council with the sets of data discussed during the Council meeting. For the Advisory Subpanel, Wayne Heikkila requested that economic data for the albacore fishery be projected for 6 years into the future. The Management Team recognized the futility of performing such a forecast and the unreliability of any effort to do so.

The Management Team discussed the possibility of producing an analysis and characterization of the fishery's recent history. I expressed AAFA's support for a review of reliable historic data and provided the Management Team with a number of suggestions as to how the data could be filtered and arranged in efforts to provide a most useful analysis.

I brought the Management Team's attention back to the original announcement of the control date in 2000. I pointed out that the existing control date applies to all gear types that land HMS species. Any "new" control date, even if applied only to albacore, must address all effort and gear types, in order to avoid undesirable effort shift.

There was a fair amount of time spent discussing what a control date is and is not. It is clear that a control date is not set in stone. More importantly, it is simply a courtesy notice that the Council may, in the future, take some action (like limited entry or other effort limitation) and that any new participants to the fishery may not rely on continued participation. A main purpose of a control date is to avoid speculation.

A number of graphs and tables were presented that were constructed from historical fishery data. These demonstrated that while the number of vessels with albacore landings is frequently quite high, those numbers drop significantly when you remove vessels with landings of 5 tons or less. It was also noted that, in recent years, there appears to have been a northward shift in the fishery.

The Management Team recognized that due to inaccuracies and inconsistencies in data collection, as well as the fact that many vessels fish with both gear types, all data representing "troll" gear must be construed to represent both troll and pole & line gear types.

There was discussion of the need to analyze the data in order to determine how many vessels have made landings of albacore, and over what time frame.

AMERICAN ALBACORE FISHING ASSOCIATION

Re: Report on Meeting of HMS Management Team, February 23-25, 2010

(Continued)

It was recognized that the Council should decide, on a policy level, if effort control is desirable. If the Council establishes a new control date, it would be sending a message that Limited Entry is moving forward. This was probably the most significant observation to result from these meetings.

Electronic Log Book:

A presentation was made to the Management Team regarding a proposal to implement a coast-wide electronic logbook for commercial fisheries. The proposal might even be extended to include a portion of the recreational fisheries. This e-logbook is different from the electronic version developed by John Childers at the Southwest Fisheries Science Center.

This electronic logbook program would replace current the federal HMS program and state CPS programs. It was being designed to meet some of the data needs required by the Council.

It was represented that this electronic logbook program would benefit fishermen by simplifying logbook reporting; providing more consistent logbook requirements across a variety of fisheries; and through the use of GPS system data to record locations and times. This is designed to reduce data collection costs and allow conservation objectives to be met more effectively.

This new logbook program seeks to develop trip-level economic data. The logbook would gather information through a number of economic questions regarding fuel costs and fuel consumption, bait and ice costs, grocery and miscellaneous expenses, as well as Captain and crew-share payments.

I expressed concern over the extent of this data collection effort. I indicated AAFA fishermen's long history of support for data collection efforts and the SWFSC's program for development of e-logbooks. This current proposal appears to go far beyond fishery data gathering and delves into virtually every aspect of a vessels operation. Without adequate justification, such intrusions will not be welcomed by fishery participants. NMFS may have the legal authority to collect data, but fishermen need proof of the benefits that will result. There's also the question of whether this additional data-gathering burden would replace observer requirements? Or would it be stacked on top?

During discussion of this proposal it became clear that any additional data collection efforts should be directly linked to a demonstrated need in order to improve stock assessment and resulting fishery management.

AMERICAN ALBACORE FISHING ASSOCIATION

Re: Report on Meeting of HMS Management Team, February 23-25, 2010

(Continued)

Marine Recreational Information Program (MRIP) Project Update:

The last albacore-related item on the agenda was the development of a Marine Recreational Information Program (MRIP) to provide a Catch Per Unit of Effort (CPUE) index of abundance for North Pacific albacore. This program will collect data from the Commercial Passenger Fishing Vessel (CPFV) fleet. The catch data will be used to calculate CPUE data and then generate an index of abundance for albacore. This information could help improve the accuracy of stock assessments and improve understanding of albacore stocks and regional migration patterns.

If you have any questions or would like to discuss any of these matters, please do not hesitate to contact me. Thank you.

Yours truly,

/Chip Bissell/

Chip Bissell