

WESTERN FISHBOAT OWNERS ASSOCIATION®



P.O. Box 138
Eureka, CA 95502

Ph. (707) 443-1098
Fax (707) 443-1074

e-mail <wfoa@cox.net>
website: <<http://www.wfoa-tuna.org>>

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Chairperson Stephanie Harlan
MBNMS Advisory Committee
299 Foam Street
Monterey, CA 93940

Superintendent William Douros
MBMNS
299 Foam Street
Monterey, CA 93940

Dear Ms. Harlan and Mr. Douros:

Western Fishboat Owners Association represents nearly 500 albacore tuna trollers based on the U.S. west coast and fishes for albacore tuna from approximately June through October of every year. We fish in a very environmentally friendly manner and annually supply nearly 120 million servings of albacore to consumers worldwide. We also contribute to albacore research over the past 30 years and work with NMFS/NOAA on joint tagging and other projects to enhance our knowledge of our fish and fishery.

Most of the fishery is located off the west coast from 40 - 200 miles offshore. For many of our members this is their main source of income annually and many are displaced from other fisheries due to regulation and precautionary management. Our organization has been involved and very proactive in both international and federal conservation conventions, treaties, and fisheries' management plans. Unfortunately well meaning measures at all levels have become something they never intended to be. Most management regimes and regulations even if originally implemented and proposed by industry itself have become bureaucratic safe havens, over spending and wasteful projects for NGO's and government officials, and have not done a thing to enhance the role of U.S. fishermen. While we have been "examples" to the world, other nations that recognize the ocean as a source to feed people and supply the consumer with a reasonably priced healthful product continue unfettered while our fishermen watch the bureaucracy grow ever larger under the name of conservation.

It was brought to my attention that MBNMS is entering a review process of its sanctuary plan. We encourage a very transparent process, and the inclusion of all who actually live and make a living from the ocean and area that have become sanctuaries and those that may potentially become.

Our fleet has not seen economic effects or ocean access limitations in regards to MPA's and sanctuary status of given areas. This is because we fish highly migratory species in offshore areas, beyond the continental shelf. The potential encroachment of the Monterey Marine Sanctuary to the Davidson Seamount is very troubling. This area is very productive for our albacore trollers. Albacore seem to congregate around sea mounts. Although our vessels use hook and line methods directly on the surface, bottom formations and currents that are a half mile below them draw the fish. These vessels would have absolutely no effect on the region except for displacing a few tons of water temporarily. This is one area where haste could be extremely damaging to the fishing community and families.

Another menacing aspect is the willingness to use the "precautionary approach" as a tool. As we all may know, this theory has never been defined, and any attempts by regulators at defining the term usually means zero effort or a very conservative management regime. Arguments I hear are MPA's are needed as an area for a species to repopulate, area for research, or bio diversity management. This argument cannot be applied to albacore tuna. Being highly migratory, albacore travel in a period of a few months from the western pacific to this coast and back again, and may congregate in an area like the Davidson Seamount and other places. There are so many unknowns and terms used loosely it is very dangerous to move except with the utmost precaution in applying another series of marine reserve as well as haste in modifying existing ones. WFOA feels that a conglomeration of small closed areas of the ocean only drive legitimate fishermen into tighter areas which totally defeat any purpose these area designations may have had.

WFOA would like to ask those who may see an immediate and pressing need for additions or modifications under this plan how they will benefit either in a physical way or monetary way. To close areas to dedicated fishermen to make a job site for others that do not feed the consumer, without ample evidence a problem exists is common sense taken to the absurd.

Sincerely,



Wayne Heikkila
Executive Director

cc: WFOA Board of Directors