

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke
Executive Director



ESTIMATED TIME
1 HOUR

DATE: September 16, 1994

SUBJECT: Pacific Pelagics

ACTION REQUIRED

Consider which Council should lead in developing reporting requirements for Pacific Pelagics.

BACKGROUND

For a number of meetings now we have had a request from the Western Pacific Fishery Management Council (WPFMC) seeking concurrence from the Pacific and North Pacific Councils for the WPFMC to lead in developing management and data reporting amendments for the Pacific pelagic fisheries management plan. Those fisheries include bigeye, yellowfin, bluefin, albacore and skipjack tuna, swordfish, marlin, wahoo, and dolphin (mahimahi).

WPFMC's original pelagics plan was implemented in 1987 and has been amended six times as summarized in item C-2(a). A seventh amendment is under Secretarial review, and would replace the current moratorium on new entrants with limited entry granting licenses to 167 permit holders. Permits would be transferable, with or without the sale of the vessel. Domestic longliners without permits would be allowed to transit the EEZ and enter Hawaii ports for supplies, but would be prohibited from off-loading their catch. If approved, the license system could take effect in 1994. The Council also has an observer program and, later this year, will require longliners to carry and operate an automated vessel monitoring system (VMS) to enforce closed area restrictions over an area of 160,000 nm.

More than just Hawaii-based boats fish pelagics. Fishermen from the Pacific Coast and Alaska, as we heard from Mark Lundsten last January, fish these stocks, well outside the 200-mile Hawaii EEZ, and their landings often are made in other states. Cooperative management, particularly collection of catch data for stock assessment, from all fishermen, is a major goal of the WPFMC. Because fishermen from the three Councils' jurisdictions fish pelagics within and beyond the Hawaii EEZ, WPFMC has proposed five different management arrangements (see pages 9-13 of item C-2(a)):

1. Status quo: Each Council develops separate regulations to control "their" fishermen.
2. Coordinate data collection only: The three regions would try to coordinate data collection programs. There would be no structured collaboration on management.
3. Joint Council FMP preparation. The three Pacific-area Councils jointly prepare the management program and each votes on any proposed actions.

4. Secretarial U.S. Secretary of Commerce develops plan because lack of action by one of the Councils leads to conservation and management problems.
5. Single-Council designation. A lead Council is designated to develop regulations, with consultation with other Councils.

WPFMC prefers option 5 with their taking the lead given their past history of management of pelagics. They would focus initially on comprehensive collection and exchange of fisheries data throughout the range of the stocks. They would also establish formal coordination procedures to determine the need for additional measures and then develop them. The WPFMC feels that a single FMP is administratively the simplest and least costly way to manage the fisheries. If given the lead, they would strive to include other Councils and the appropriate states in the decisionmaking. They would not approve measures affecting west coast fisheries without, at least, joint hearings or meetings. Coordination efforts they propose are listed on pages 13-15 of their discussion paper in C-2(a).

With us today are representatives of the Pacific and Western Pacific Councils. For the Pacific Council are Chairman Frank Warrens and Executive Director Larry Six; for the Western Pacific Council are Chairman Edwin Ebisui, James Cook, and Executive Director Kitty Simonds.

One possible course of action our Council could take would be to send a letter to both the Western Pacific and Pacific Councils stating that we have few fishermen who participate in the pelagics fishery, and that it would be best for those two Councils to work out management arrangements. I think that it would be more efficient, and thus preferable, to have just one Council run point on pelagics management. Our Council's role, at minimum, should be consultative and we would provide an opportunity for fishermen to comment on any regulations developed by the other two Councils. We may also want to request ADF&G to collect voluntary catch information from any pelagics fisherman who lands in Alaska. Tables summarizing landings and value are under item C-2(b).



**Management of US Pacific Pelagic Fisheries:
Single Council Designation**

21 September 1994

1. Introduction

The Western Pacific Regional Fishery Management Council (WPRFMC) is requesting the Pacific and North Pacific Councils to concur with designation of the WPRFMC as the single council for management of domestic pelagic fisheries in the Pacific. The Western Pacific Council feels that coordination of pelagic fisheries management is essential to the health of all Pacific pelagic fisheries, and that a single Council is the most effective way to proceed. This paper briefly describes the history of pelagic fisheries management in the western Pacific, and presents a proposal for an effective US management system that would ensure that the interests of Pacific pelagic fishermen, resource managers and others are incorporated into the management system.

In 1993, domestic pelagic vessels based in the Western Pacific Council's area of jurisdiction (American Samoa, Guam, Hawaii and the Northern Mariana Islands) harvested over 15,400 metric tons (mt) of pelagic fish worth over \$64 million. Longline gear accounted for most of that harvest, followed by trolling, handlines and pole-and-line. Swordfish and bigeye tuna comprised the largest landings, followed by yellowfin and skipjack tunas, sharks and other species. In ports of the western Pacific region, US distant water vessels delivered or transshipped an additional 155,000 mt of pelagic fish worth \$133,000,000. In addition to these domestic landings, foreign vessels landed or transshipped an additional 68,600 mt in ports of the region, worth \$229 million. For domestic landings only, Pago Pago Harbor, American Samoa, ranked second in the nation in terms of ex-vessel value, and fifth in terms of volume. Honolulu, Hawaii, ranked seventh in ex-vessel value. For combined domestic and foreign landings (including transshipments), four of the top seven US ports are located in the western Pacific region.

The rationale for considering all domestic pelagic fisheries in the Pacific under one fishery management plan is to ensure the ability to monitor and manage the fisheries throughout their range, to the extent practicable, in an effective and efficient manner. Effective monitoring of catch, effort and other aspects of the fisheries that are necessary for assessing impacts on stocks and fisheries, requires consistency and compatibility in data collection and analysis given the geographic distribution of species and harvesters

across the Pacific. Management principles should be reasonably consistent throughout the different areas fished. Although the management measures would not be expected to be identical in different areas, the goals of management should be similar. A single regulatory section dealing with pelagic fisheries is more efficient than several sections. The WPRFMC has no intention of regulating the activity of existing west coast and Alaska fisheries beyond the state or federal regulations that might exist for those fisheries, without guidance at all stages from those Councils, state agencies and fishermen.

2. Goals of the FMP

The Fishery Management Plan for Pelagic Fisheries of the Western Pacific Region (FMP) has been in existence since 1987. The FMP is designed to maximize the net benefits of pelagic fisheries to the nation. Established commercial fisheries should remain viable and profitable, recreational fisheries should provide satisfying leisure experiences, and traditional fishing practices for non-market personal consumption and cultural purposes should continue. Conservation and management of pelagic fishery resources should be attempted, with reasonable consistency and without duplication of effort, throughout the natural range of management unit species.

3. Western Pacific Management History

The western Pacific pelagics fishery management plan defines the management unit to include several species of value and interest to west coast interests, including swordfish, striped marlin, and albacore. The domestic longline fishery based in Hawaii is under federal regulations that include limited entry, logbook reporting, on-board observers, area closures (to prevent gear conflicts with smaller boats and to protect endangered species), and requirements for a vessel monitoring system. Other domestic fishery sectors are not under management regulations at this time, although there is a great need for comprehensive data collection from all sectors. There is also some concern about the possible excess take of small tunas by a handline fishery in Hawaii, and about the sale of blue marlin for food. The principal biological concerns are the possible impact of the longline fishery on populations of swordfish and protected species, notably sea turtles. The principal economic and social concerns focus on maintaining the social, cultural and economic values associated with troll and handline fisheries, both commercial and recreational, while minimizing necessary restrictions on longline fishing opportunities.

A. Species and species groups now contained in the FMP management unit

Swordfish	Tunas	Oceanic sharks	Sailfish
Marlins	Pomfret	Oilfish	Mahimahi
Spearfishes	Wahoo	Moonfish	

B. Geographical area of the management unit – the US EEZ around

American Samoa	Johnston Atoll	Northern Mariana Islands
Hawaii	Wake Island	Kingman Reef and Palmyra Atoll
Guam	Jarvis Island	Howland and Baker Islands

In addition to these EEZ areas, the FMP's regulations apply to US pelagic fisheries, based in the Western Pacific Council's area of jurisdiction, that operate in international waters beyond the EEZ.

C. The following table summarizes fisheries that take management unit species, and the current level of federal regulation in the western Pacific region's EEZ. Foreign fishing is not currently authorized in the EEZs of the region because there is no Governing International Fisheries Agreement to authorize such fishing. Additionally, some regulations specifically prohibit foreign fishing in certain areas of the EEZ (e.g., no foreign fishing is allowed in areas that are closed to domestic longline fishing).

Fishery	Level of Federal Regulation
Pelagic longline	Domestic strictly regulated; foreign prohibited
Troll (incl. high-seas albacore, coastal recreational, commercial and charterboats)	Domestic unregulated; foreign prohibited
Pole-and-line (baitboat)	Domestic unregulated; foreign prohibited
Pelagic handline	Domestic unregulated; foreign prohibited
Purse seine	Domestic unregulated; foreign prohibited
Drift gillnet	Domestic and foreign prohibited

D. History of management measures implemented under the FMP

The WPRFMC region's major pelagic fisheries have changed considerably since the FMP took effect. Domestic fisheries have grown substantially (especially the Hawaii-based longline fishery), and the only authorized foreign fishing had been pole-and-line fishing for skipjack tuna, which ended in 1992. The following summarizes the history of the pelagics FMP.

- Fishery Management Plan (1987)

The FMP included initial estimates of maximum sustainable yield (MSY) and optimum yield (OY) for pelagic resources and fisheries in the EEZ. At the time, the regulations applied to fishing only for billfishes, wahoo, mahimahi and oceanic sharks. (Tunas were not included under US jurisdiction until 1992.) Drift gillnet fishing was prohibited within the region's EEZ, but the FMP included provisions for experimental drift gillnet fishing. The principal goal was regulation of the foreign longline fishery in the EEZ to ensure that foreign catches would not potentially impact domestic commercial and recreational fisheries.

The FMP prohibited foreign longline vessels from fishing within certain areas of the EEZ, and allowed foreign longlining in other areas. These open areas could be reduced if foreign fishing activity was found to be causing adverse impacts on domestic fishery performance, excessive waste of catch, excessive enforcement costs, or adverse effects on stocks. The FMP also contained reporting and observer requirements for foreign vessels. The FMP addressed joint venture processing (JVP) for billfish and other non-tuna species by stating that practically all fish are landed without processing, and local firms handle whatever processing that is done. Thus, there is no allowance for JVP. No authorized foreign longline fishing has occurred under the FMP. The FMP specified domestic annual harvest (DAH) and total allowable level of foreign fishing (TALFF) in non-numeric terms, i.e., the amount of fish that could be caught when fishing in accordance with the management measures in the FMP.

- Amendment 1 – Overfishing definition (1991)

Amendment 1 to the FMP was developed in response to new Guidelines for the Magnuson Act National Standards (Guidelines, 50 CFR 602). Amendment 1 included a measurable definition of recruitment overfishing for billfishes, mahimahi, wahoo and oceanic sharks, a revised definition of OY, and a revised set of objectives to bring the FMP objectives into accord with the definitions of overfishing and the revised definition of OY. As modified, OY is the amount of each species or species complex that can be harvested by domestic and foreign fishing vessels in the EEZ, without causing "local overfishing" or "economic overfishing" within the EEZ of each island area, and without causing or significantly contributing to "growth overfishing" or "recruitment overfishing" on a stock-wide basis. Amendment 1 also modified the objectives of the FMP to be consistent with a) the new Guidelines and b) the changing nature of the fisheries, including the growth of the longline fishery and the virtual absence of foreign fishing in the EEZ.

As defined by the WPRFMC, overfishing has occurred when the spawning potential ratio (SPR) for a stock has declined below specified threshold levels. The SPR is a measure of the current reproductive capacity of these stocks or stock complexes relative to their unexploited capacity, measured over the entire stock range. This definition focuses on "recruitment" overfishing of the stocks on a stock-wide basis. According to the definitions of recruitment overfishing, billfish, mahimahi and wahoo (and, under Amendment 6, tunas) would be considered overfished if their SPR is equal to or less than 0.20, and oceanic sharks are considered overfished when their SPR is equal to or less than 0.35.

- Amendment 2 – Longline permits and logbooks (1991)

This amendment clarified that the FMP management unit area extended beyond the US EEZ to areas where pelagic fishing and support activities might affect fisheries and support activities in the western Pacific region. Amendment 2 required longline vessels to have "general" federal permits and maintain NMFS logbooks. The logbooks were designed to provide information critical for stock assessments of management unit species (existing state/territorial data collection programs do not provide this information), as well as interactions with protected species. The regulations also authorized the placement of observers on longline vessels intending to fish within 50 nautical mile (nm) "study areas" around certain areas in the Northwestern Hawaiian Islands (NWHI), to document the level of interaction with protected species. That observer requirement was nullified by Amendment 3.

- Amendment 3 – NWHI Protected species zone (longline closed area) (1991)

Amendment 3 established a zone in the NWHI where pelagic longline fishing is prohibited to protect endangered Hawaiian monk seals. The zone extends 50 nm seaward from each of the islands in the NWHI, and includes certain 100-nm wide monk seal migratory corridors between some islands. This action effectively abrogated the regulations for the placement of observers in the 50-nm study areas created by Amendment 2. Amendment 3 included framework provisions which would allow the NMFS Regional Director, with concurrence of the WPRFMC, to modify conservation and management measures in response to changes in the fishery or new information on protected species.

- Amendment 4 – Hawaii longline moratorium (1991)

Amendment 4 established a moratorium on new participants entering the Hawaii longline fishery for a total of three years, with limited exceptions for persons who had made certain financial commitments, and for participants in the

NWHI lobster fishery. A one-time transfer of the moratorium permit was allowed. For enforcement reasons, non-permitted US longliners were not allowed to enter the EEZ around Hawaii. The WPRFMC established the moratorium to halt expansion of the longline fishery to provide a period of stability during which data could be collected and analyzed to assess the impacts of increased longline effort, and maintain the values of all existing Hawaii fisheries. The moratorium expired on 22 April 1994, and was replaced by a limited entry program implemented on 24 June 1994, under Amendment 7.

- Amendment 5 – Main Hawaiian Islands longline closed area (1992)

Under Amendment 5 certain areas around the main Hawaiian Islands and Guam were closed to pelagic longline fishing. This action was intended to prevent gear conflicts and vessel safety issues arising from interactions between longliners and smaller fishing boats. For Hawaii, the closure includes the area within 75 nm of the islands of Kauai, Niihau, Kaula and Oahu, and within 50 nm of the islands of Maui, Molokai, Lanai, Kahoolawe and Hawaii. For Guam, longlining is prohibited within 50 nm of Guam's 100-fm isobath, including offshore banks. Amendment 5 also provided a framework mechanism to modify the area closures if new information indicates that a change is necessary in order to meet the objectives of the FMP. A seasonal modification of the Hawaii closure was later implemented to give longliners access to important bigeye tuna grounds in the winter when the fish are closer to shore and small-boat activity was relatively low.

- Amendment 6 – Tuna inclusion (1992)

Effective January 1992, the Magnuson Act was amended to define tunas and related species as "fish" under US management authority. Amendment 6 included the tunas and related species as FMP management unit species, and incorporated a definition of overfishing which is consistent with that developed for the other management unit species in Amendment 1. The regulations established by Amendment 6 extended all domestic longline restrictions (area closures, moratorium, etc.) to prospective foreign longline vessels. Areas closed to domestic longline fishing were also closed to foreign purse seiners and baitboats. Finally, Amendment 6 extended foreign fishing permit and observer requirements to all foreign pelagic fishing vessels, regardless of their gear type and target species.

- Amendment 7 – Hawaii longline limited entry (1994)

Amendment 7 implemented a limited entry program for the Hawaii longline fishery. The program initially allows for up to 167 Hawaii limited-entry permits, the same number as allowed under the previous moratorium. Permit holders are allowed to upgrade or replace their vessels up to the length of the longest vessel that was active during the moratorium (101 ft). Permits are transferable, with or without the sale of the vessel, subject to the restriction on vessel upgrading. The program includes framework procedures which provide for rapid adjustments in fleet size, catch, or effort, if future information on the fisheries and the status of stocks indicates a need for such changes. Domestic longliners that do not hold Hawaii limited entry permits are allowed to transit the EEZ and enter Hawaii ports for supplies, but are prohibited from fishing or off-loading their catch. In addition to the limited entry program, Amendment 7 clarified that OY encompasses fishing by all vessels to the extent regulated by the FMP, and added moonfish, pomfret and oilfish to the management unit. General permits (not limited) are still required for domestic vessels based in American Samoa, Guam and the Northern Mariana Islands.

- Longline observers (1994), and vessel monitoring system (pending)

In September 1993, the WPRFMC requested the NMFS to establish a mandatory observer program for the longline fishery, and that program is now operational. The Council also acted to require longline vessels to carry and operate an automated vessel monitoring system (VMS). The VMS will allow effective enforcement of the Hawaii area closures, an area of about 160,000 nm². The VMS regulations and system are now being developed, and should be implemented in late 1994. These actions were taken through the framework provisions of Amendments 3 and 4, respectively.

- Future action

The WPRFMC intends to develop and implement a program that would provide for comprehensive data collection from all pelagic fisheries sectors in the western Pacific region. The WPRFMC, with support of the US State Department, also intends to develop VMS requirements for foreign fishing vessels that either fish within US waters of the western Pacific region or visit US ports in the region.

4. Need for Cooperative Domestic and International Management of Pacific Fisheries

Accurate stock assessments of pelagic species are not possible with existing fisheries data. More and better data are needed from all fisheries for target and non-

target pelagic management unit species, as well as interactions with protected species, throughout their range. The federal permit and reporting requirements for Hawaii-based pelagic longliners contribute greatly to filling this need. Some Hawaii-based longliners, however, make landings in other areas, and domestic and foreign vessels land their fish in other areas and nations. All of the catches are taken from the same stocks, so a coordinated system is essential to ensure adequate data collection and assessments for evaluation of impacts on these stocks. The Hawaii logbook and observer programs will provide valuable data, but additional information is needed from domestic and foreign longline vessels operating elsewhere. Some domestic data are being collected by Inter-American Tropical Tuna Commission (IATTC) observers, and additional data may be collected from proposed California fishing logbooks.

In addition to the impact on target stocks and non-target species, the conservation of protected resources is important to the nation. Several of the more restrictive regulations in the domestic western Pacific longline fishery have resulted from concern about protected species, often based on sparse data. Hawaii longliners occasionally take sea turtles as bycatch, and turtles are undoubtedly taken by other domestic and foreign pelagic fisheries. There is a need to determine whether or not the level of sea turtle takes by all pelagic longlines, and other gear, is detrimental to turtle populations.

An important concern of the Western Pacific Council, and a main goal of cooperative management of domestic fisheries in the Pacific, is the potential impact of fishery interactions. For example, do the activities of one pelagic fishery sector influence (directly or indirectly) the availability of fish, market conditions or other aspects of different sectors? To answer this and other questions, the WPRFMC's view is that fisheries information should be collected throughout the species' and fisheries' ranges, and analyzed in a comprehensive manner.

Practical conservation of pelagic species throughout their range requires international collaboration. For example, at the same time US pelagic fisheries based in the Western Pacific Council's jurisdiction have recently caught about 15,000 mt of fish per year, annual catches in the early 1990s from the South Pacific Commission's statistical area have been nearly 1,000,000 mt. Most of the South Pacific harvest is made by purse seines fishing, followed by longline, pole-and-line and troll. Most of this harvest is made by distant-water fishing nations, including US purse seiners (about 200,000 mt), US albacore trollers (about 3,800 mt) and US longliners (about 150 mt).

The relative impacts on fish stocks by domestic fishing in the North Pacific are difficult to determine. At this time, Hawaii-based fisheries probably do not contribute measurably to the possibility of recruitment overfishing of any pelagic fish stock, and in turn, stricter management measures for Hawaii fisheries would probably not contribute significantly to the rebuilding of any stock that might become overfished. Hawaii

landings are estimated to account for less than 5% of the total Pacific catch of any pelagic species. A possible exception is swordfish – Hawaii-based longliners are thought to take about 15% of the total Pacific catch, and over 40% of the catch from the northeastern central Pacific.

Conservation and management discussions have begun with other nations that target the same species as US fishermen. While direct high-seas regulation is not likely in the immediate future, the exchange of fisheries and related data could soon be achieved through international negotiations. In fact, there is already considerable exchange of data among scientists, but formal data exchange is more limited among the many nations that are now involved in pelagic fisheries. The South Pacific Forum Fisheries Agency (FFA), South Pacific Commission (SPC), IATTC and other regional organizations are variously collecting data, conducting research and establishing management policy throughout their respective jurisdictions in the Pacific. As an example to promote data exchange between the Western Pacific Council and these organizations, the WPRFMC has on its Scientific and Statistical Committee (SSC) scientists from the SPC and IATTC. Indeed, the composition and activity of the US fishery management Councils is wholly consistent with these other regional organizations. As such, future international discussions by the Departments of State and Commerce regarding fishery management would likely include representatives of the Council system.

International cooperation regarding pelagic fisheries is an important goal of the Western Pacific Council. Achieving Pacific-wide management that is comprehensive and effective will take time, however, and will require the Council to work closely with the Departments of State and Commerce. At the same time that the framework for international management is being developed, a comprehensive program must be created and implemented to assess and manage domestic fisheries. When the time comes for international negotiations, the USA will be in a stronger bargaining position if it can show that it has made a concerted effort to establish a database and manage its own Pacific fisheries, both within the EEZ and on the high seas.

5. Options for Cooperative Management Under the Magnuson Act

A. Status Quo

Each council (and its associated states) acts independently in its respective area. There is no formal coordination mechanism, and cooperation is limited to each Council staying apprised of other Councils' activities. The Western Pacific Council would retain its FMP for pelagic fisheries, and the other Councils and states would continue to monitor and regulate their fisheries to the extent they desire.

Advantages: This is the simplest option to administer because no change is needed in institutional arrangements. Action could be taken rapidly in the respective areas; the Western Pacific Council would use FMP framework procedures, and the states and other Councils would use their own regulatory procedures.

Disadvantages: Under the existing system, if pelagic management plans are developed for the Pacific and/or North Pacific regions, there could be two or three sections in the federal regulations concerned with management of these fisheries, with certain redundancy and duplication of effort. There would be little or no coordination across the regions under US authority. Of special concern would be inconsistent regulations applied to fishermen from different Council regions harvesting the same resource, possibly resulting in actions from one area having unintended consequences for fisheries in another area. There also would be limited control to ensure adequate data collection and management. Management measures would likely be complex and confusing for fishermen.

B. Coordinated data collection only

Under this option, the three regions would try to coordinate existing and new data collection programs, but there would be no structured collaboration regarding management. Scientists and managers from each area would jointly review existing data collection programs. If existing data systems are determined to be adequate, a mechanism to share the data would be recommended to the various management agencies, including the three Councils, nine states/territories, and other appropriate regional organizations. If data gaps are found, the same organizations would be tasked with implementing data systems that would provide and share the requisite information.

Advantages: No major change in governmental institutions or procedures would be needed. There would be more coordination between western Pacific, west coast or Alaska interests than exists now, as far as data collection is concerned. The scope of data collection and analysis would be broadened, with potential consistency and comparability of results. Management actions could be taken rapidly under existing management programs in the respective areas, if necessary.

Disadvantages: Coordinating disparate data collection programs is complex and inefficient and, as such, this approach is likely to fail. Even if scientists and managers agree about how to coordinate pelagic data collection and sharing, such data are likely to be of differing relative importance among the various states and regions. Management goals are not homogeneous throughout the region, and current and future funding for multiple data programs is likely to be limited. The Councils would be in a position where, rather than planning a coordinated management regime, they would be merely reactive to observed problems. The actions in one area could have unintended

consequences for another area, and differing management goals might lead to measures that are complex and confusing for fishermen. Thus, this option of coordinated data collection is likely to meet with less success than designating a single agency with a well-defined management philosophy to be responsible for defining data collection strategies in the region.

C. Joint preparation of FMP

The three Pacific-area Councils would attempt to jointly develop and implement the management program, as authorized by section 304(f)(1)(B) of the Magnuson Act. Support from all Councils would be required for proposed management actions. There would be formal coordination mechanisms, including joint planning teams and industry advisory panels. There also would likely be joint hearings and Council meetings.

Advantages: There would be more coordination between western Pacific, west coast and Alaska interests in developing data collection and other management measures. There would be a single FMP to cover all fisheries, with consistent goals for management. A single set of regulations would be less complex and more understandable to fishermen.

Disadvantages: Whether or not this approach could be advantageous in the Pacific is unclear, but the differing management goals and priorities among the various areas would likely be troublesome. This option is more complex due to the need for joint meetings to ensure adequate discussion of management needs and actions. There is also a high probability that different regional priorities would prevent effective management. This strategy was so ineffective in the Atlantic and Gulf of Mexico that Congress removed authority from the Councils, and assigned the management of Atlantic migratory species to the Secretary of Commerce (Secretary).

D. Secretarial management of Pacific pelagic fisheries

If the Pacific and/or North Pacific Councils fail to respond to conservation and management concerns (e.g., lack of comprehensive data, and/or unresolved problems with stocks of fish and protected species, fishery economics or social aspects of fisheries), the Secretary could develop an FMP for pelagic species off the west coast and/or Alaska, as authorized by section 304(c)(1) of the Magnuson Act.

Advantages: This option is simple in concept; NMFS would have total vertical management authority, from arranging meetings with user groups, to development of FMP and regulations, to playing a major role in international negotiations. If established at the regional level, which is perhaps most efficient, the regions could involve Councils

through special review, input, and advisory procedures. There would be one set of regulations, with coordinated research, data collection, analysis, and reporting.

Disadvantages: While a strong vertically-controlled system may be the simplest, it creates only a superficial system of checks and balances among managers, fishermen and others. This option would reduce the level of local authority over management of fisheries, and may lead to an unnecessarily complex management process. Allowing the Secretary to develop, approve, implement, administer and enforce a plan could lead to a perfunctory analysis and treatment of issues that have great local importance. There would be no formal mechanism for receiving advice from an extensive network of scientific, environmental and fishing representatives, as there now is with the Council system, and there would be a reduced role of the Councils in domestic management and in international discussions. There could be a loss of regional NMFS authority if regional offices do not carry out functions of the Secretary. Even then, politics in DOC or NOAA can dictate approaches more than with Council lead; the general view is that the higher the level of authority, the greater the chance of foreign agendas in decision-making policy. There is a potential for reduced management credibility unless NMFS establishes formal advisory and scientific groups similar to the Council approach. Secretarial control essentially makes the Council system superfluous for management of pelagic species and, thus, Councils would not be able to meet their basic terms of reference under the Magnuson Act.

E. Single-Council Designation

The Secretary would designate one of the three Pacific-area Councils to prepare the fishery management plan and amendments, as authorized by section 304(f)(1)(A) of the Magnuson Act. That Council would have the responsibility for fishery planning, with input from the other involved Councils and regions. The designated Council, in consultation with other Councils, would establish coordination mechanisms and procedures to ensure that all of the region's managers and scientific and industry advisors contribute to development of the plan and subsequent amendments.

Advantages: The responsibility for domestic management of the resource would remain in the region. A single FMP and set of regulations would cover all areas. Framework procedures in the existing western Pacific FMP could be adapted to encompass other areas. There would be close coordination in all aspects of research, data collection, and management. There would be a consistent set of goals, with the flexibility for regional differences in management approaches. The possibility for management in one area to have unintended consequences for another area is reduced, as is potential confusion for fishermen. All involved areas would have full opportunity for input during scoping and decision-making.

Disadvantages: Management decisions could potentially be made with less than satisfactory input from fishermen and other advisors from the west coast and Alaska. There may be differing management priorities among the various areas, but resolving such differences would be less troublesome with single Council than with joint FMP approach. There could be some reliance on NMFS to ensure that management in each area fits that area and is consistent with Magnuson Act and other applicable law. There could be some increase in workload to ensure adequate procedures and coordination with Councils and states on the west coast and Alaska.

6. Proposal for Cooperative Management

A. Designate the Western Pacific Council as the single Council for the fishery management program for Pacific pelagic fisheries (Option E above). Of the above options, this would appear to be the most efficient because the existing pelagics FMP and implementing regulations provide a sound starting point for data collection, research, and management, and could be amended as needed to encompass fisheries based on the west coast and Alaska.

Several steps may be necessary to incorporate the west coast and Alaska under the FMP:

- 1) Add descriptions of the fisheries for pelagic management unit species that are based in, or fishing within the EEZ off west coast states and Alaska;
- 2) Add descriptions of existing pelagic fishery management programs of the states;
- 3) Add descriptions of current research and data collection activities of the states, NMFS, and others directed at pelagic fisheries and species off the west coast and Alaska;
- 4) Develop specific organizational changes and prepare separate framework procedures for considering changes in management of west coast and Alaska-based pelagic fisheries through the Pelagics FMP, including:
 - a) Add a section with coverage of west coast and Alaska pelagic fisheries to the current annual report requirements;
 - b) Specify who is to prepare sections in the report covering west coast and Alaska pelagic fisheries;

- c) Establish advisory subpanel(s) for pelagic fisheries on Pacific and North Pacific Councils to meet as needed;
- d) Establish a special subcommittee of the SSC or SSCs to deal with pelagic fisheries, as needed;
- e) Agree on data collection and/or submission requirements and the extent that state requirements suit federal needs; and
- f) Add framework procedures for considering recommendations for regulatory changes.

5) Add to the annual Pacific and North Pacific Councils' management review cycle, a review of the annual report sections dealing with west coast and Alaska pelagic fisheries and status of stocks taken by those fisheries, as well as an evaluation of the need for management changes.

B. Focus initially on the comprehensive collection and mutual exchange of fisheries data and other relevant information to ensure adequate coverage of all domestic Pacific fishing activity on pelagic management unit species and protected resources throughout their ranges. Initial emphasis would be on US longline vessels, regardless of where they land their fish. Scientists, managers and industry advisors from the involved areas would jointly review all existing data collection programs. If existing programs are determined to be adequate for stock assessment and fishery evaluation purposes, cooperation could be limited to exchange of the data. If these data are not adequate, a federal logbook program similar to that used in the western Pacific could be extended to vessels from other areas. If information on protected species is not adequate, observer coverage could be extended to document interactions with protected species, total catch and discards.

C. Beyond data collection, formal management procedures would be established under the single-Council process. The Western Pacific Council would make management decisions that directly affect west coast or Alaska fisheries only after the other Councils and constituents have an opportunity to take a position on the action. Any action taken by the WPRFMC would be subject to the guidelines of the National Standards, other applicable laws, and the administrative record. The following suggested process would ensure full opportunity for the Pacific and North Pacific Councils and related interests (states, industry, environmental groups, etc.) to participate with the Western Pacific Council in pelagics fishery management involving west coast and/or Alaska interests:

- 1) The annual report process (required by the FMP) would be expanded to include a review of fisheries and fisheries management of the west coast and Alaska. The review is designed to evaluate conditions in the fishery and recommend changes in management, research, or data collection in response to new problems.
- 2) In addition to the annual review, the Pacific or North Pacific Council or any of their constituents may at any time propose, to the Western Pacific Council, management measures for fisheries in their respective areas.
- 3) Scoping would then be conducted in appropriate areas of the west coast and Alaska to characterize management issues, and to identify and evaluate alternative solutions to problems. A preferred management alternative would be recommended for discussion by the Pacific or North Pacific Council and constituents.
- 4) If requested by the Pacific or North Pacific Council, separate framework measures would be developed to consider regulatory adjustments for west coast or Alaska fisheries.
- 5) If requested, public hearings would be held in the appropriate areas to solicit comments from the fishing community and others on the issue and management alternatives. In addition, the Western Pacific Council could hold a regular meeting in the appropriate area on the west coast or Alaska if required.
- 6) The Western Pacific Council would vote on FMP amendments or regulatory changes that may (other than indirectly) affect west coast or Alaska fisheries only after the Pacific and/or North Pacific Council and their constituents have been provided the full opportunity to take a position regarding the action.

The western Pacific pelagics FMP classifies existing management measures as "established" measures, and has framework procedures for considering adjustments to established measures and for considering "new" measures (i.e., measures that would be applied for the first time to the fishery as a whole or to a particular sector of the fishery). The FMP's framework procedures are generally "open-ended" in that action would almost always require at least two meetings of the Council and may require both two meetings and notice-and-comment rulemaking by NMFS. Thus, action is not likely to be as rapid as many of the "routine" actions NMFS takes under the Groundfish plan, but the WPRFMC framework procedures are anticipated to be faster than FMP amendments.

7. Summary and Conclusions

The Western Pacific Council intends to request Secretarial designation as the single council for Pacific pelagics management, and seeks concurrence by the Pacific and North Pacific Councils. The designation would:

- Ensure comprehensive management of pelagics fisheries in the Pacific through a single FMP; and
- Maximize management efficiency.

The Western Pacific Council intends to create a systems that ensures full opportunity for the Pacific and North Pacific Councils and their constituents to participate in full cooperation, including:

- If requested, public hearings would be held in the appropriate area prior to any management action being taken by the Western Pacific Council, if that action may (other than indirectly) affect west coast or Alaska interests; and
- The Western Pacific Council would not amend the FMP or otherwise create management measures that may (other than indirectly) affect west coast or Alaska fisheries, until the Councils and their constituents have the opportunity for full input.

Under the single council arrangement, the Magnuson Act contains safeguards against unsuitable management measures, including:

- The administrative record must demonstrate the need for and appropriateness of the proposed action;
- The record must show adequate opportunity for, and consideration of, comment by all affected parties; and
- Proposed actions must be consistent with the Magnuson Act (including National Standards) and other applicable law.

In addition, NMFS must consider inter-regional concerns and impacts in making decisions on council management proposals.

Designation of a single Council is the most effective method for the USA to begin to coordinate data collection and regulation of its Pacific pelagic fisheries. This is a necessary and important first step toward effective international cooperation regarding

fisheries management on a Pacific-wide scale. The single-council strategy would be an efficient approach to meet the goals of the FMP to keep commercial fisheries viable, allow for satisfying recreational fishing experiences, and continue traditional fishing practices for cultural and subsistence purposes.

The experience of the five Atlantic and Gulf Councils dealing with multiple joint-Council fishery management plans and concomitant voting requirements should be avoided. Secretarial management of Pacific pelagic fisheries is also undesirable because it subverts the Council system established under the Magnuson Act. The NMFS process for managing highly migratory species in the Atlantic and Gulf of Mexico is complex and bureaucratic. The potential responsibility for NMFS to manage Pacific pelagic species is as great as the Councils', but NMFS has limited staffing and funding resources to accomplish the task. The greatest potential risk from Secretarial management in the Pacific is the loss of input from local interests. The Council system provides for an early and direct voice in the management process, and the Magnuson Act provides only limited opportunity for the Secretary to reject Councils' management proposals. Thus, the single-Council approach appears to be in the best interest of Pacific fishermen and resource managers.

The Western Pacific Council recognizes that effective conservation of stocks will require inter-regional and international cooperation to encompass all Pacific fisheries. West coast fishermen are targeting the same stocks of swordfish and other species as US fishermen from the western Pacific region and other Pacific nations. A single FMP is administratively the most effective way to properly manage and conserve stocks, prevent overfishing, and achieve the maximum benefits to the nation. The Western Pacific pelagics FMP already exists, and contains framework measures that make it relatively simple to amend. The Pacific and North Pacific Councils and/or appropriate member states would be critical elements of the decision-making process. No measures directly affecting west coast or Alaska fisheries would be made without full opportunity for input from the appropriate Councils and constituents.

If this concept is endorsed by the Pacific and North Pacific Councils, the Secretary of Commerce would be requested to designate the Western Pacific Council as the single Council for the management of domestic pelagic fisheries in the Pacific.

1992 Pelagic Catch by Fishery Based in Western Pacific Region¹

Species	American Samoa ²	Guam ³	Hawaii ²	Northern Mariana Islands ²	Total by Species	% Total All Species Combined
Skipjack Tuna ⁴	71,900	138,500	1,900,000	66,000	2,176,500	7.6
Bigeye Tuna			3,463,000		3,463,000	12.1
Yellowfin Tuna ⁴	24,700	151,000	2,989,000	20,700	3,185,381	11.2
Albacore			896,000		896,000	3.2
Kawakawa	200	7,100			7,300	<1
Tunas (misc)		100	279,000	300	279,400	1.0
Swordfish			12,643,000		12,643,000	44.6
Blue Marlin	4,800	127,400	1,305,000	6,300	1,442,300	5.1
Striped Marlin			1,145,000		1,145,000	4.0
Sailfish		700		100	800	<1
Spearfish		200			200	<1
Other Billfish			317,000		317,000	1.1
Mahimahi	2,000	136,400	1,119,000	21,600	1,278,900	4.6
Wahoo	3,400	112,900	380,000	13,700	510,000	1.8
Shaika	1,300	1,800	574,000		577,200	2.0
Dogtooth Tuna	2,100	1,000		4,400	7,500	<1
Rainbow Runner	1,200	3,600		1,000	5,800	<1
Barracudas	1,000	4,800		100	5,800	<1
Other pelagics		<100	380,000		380,000	1.3
Unclassified				29,600	29,600	<1
Total	112,400	695,500	27,390,000	162,700	28,350,600	
% of Total Pelagic Catch	0.4	2.4	96.6	0.6		

¹ Catch reported underestimates total catch. For Hawaii, there is no estimate of recreational harvest and commercial harvest is likely under-reported. Evidence suggests that about 10,000 fishermen actually sell some portion of their catch, although State of Hawaii issued only about 3,000 licenses in 1992. No recreational/subsistence catch information is available for the Northern Mariana Islands. Lack of adequate coverage for creel surveys may also lead to an underestimate of the harvest in Guam.

² Rounded to nearest 100 lb, columns may not sum precisely due to rounding.

³ Rounded to nearest 1,000 lb, columns may not sum precisely due to rounding.

⁴ Does not include harvest within the EEZ by domestic purse seiners. In 1992, US purse seiners reported harvesting 32.1 million lb of skipjack and yellowfin tuna combined within the EEZ surrounding the U.S possessions of Baker and Howland Islands.



**WESTERN
PACIFIC
REGIONAL
FISHERY
MANAGEMENT
COUNCIL**

**1992 Domestic Commercial Pelagic Landings in US ports
in the Western Pacific Region**

Area	Pelagic Fishery	Pounds Landed (x1,000)	Ex-vessel Value (x \$1,000)
American Samoa	Local Troll	109	\$ 137
	Purse Seine ¹	270,270	71,637
	High-seas Albacore Trollers	6,600	5,300
Guam	Troll	297	495
Hawaii	Troll	2,093	3,920
	Handline	1,897	3,229
	Baitboat	1,725	2,415
	Longline ²	21,240	44,650
Northern Marianas	Troll	163	306
ALL COMBINED		304,394	\$132,089

¹ US purse seiners landing in American Samoa harvested fish within the EEZ of other Pacific islands, in international waters, and in the EEZ surrounding the US possessions of Baker and Howland islands. In 1992, US purse seiners reported catches within the US EEZ of 32.1 million lb.

² Hawaii-based longliners fish both inside the EEZ and in international waters. In 1992, nearly half (47%) of the total longline effort occurred outside the EEZ, while 44% and 82% of the tuna and swordfish were caught beyond 200, miles, respectively.



UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE

Southwest Region
501 West Ocean Boulevard, Suite 4200
Long Beach, California 90802-4213
TEL (310) 980-4000; FAX (310) 980-4018

September 16, 1994 F/SW011:DV

Mr. Edwin A. Ebisui
Chairman
Western Pacific Fishery Management Council
1164 Bishop Street, Suite 1405
Honolulu, Hawaii 96813

Dear Ed,

The enclosed tables were produced in response to the request by the Western Pacific Fishery Management Council staff for current information on landings of large pelagic species in California, Oregon, and Washington from 1991 through 1993. The data were extracted from the PACFIN database and dressed weights converted to round weights in metric tons. The 1991 data are from the research data base and the 1992 and 1993 data are from the redefined data base. Date of extraction for the 1992 and 1993 data was April 4, 1994.

Landings of large pelagic species in California, Oregon, and Washington are summarized in Table 1. From 1991 to 1993, total landings increased by 57% to 17,179 mt, with albacore (up 230%) and swordfish (up 132%) accounting for much of the increase. The total value of landings over the same period increased by 44% to \$34.5 million. Albacore, yellowfin, and swordfish are the most important species in terms of value.

Table 2 summarizes weight and value by state. With the exception of albacore, large pelagics are landed almost exclusively in California. As landings of albacore have increased, so have Washington's and Oregon's share of total landed value: from 3% and 4% in 1991 to 12% and 11% in 1993, respectively.

Table 3 lists the three ports in each state with the highest landed value of all species; landings by species and by port are presented in Table 4. In California, deliveries of yellowfin, skipjack, and bluefin tuna to the port of San Pedro/Terminal Island account for 45% of the total value of West Coast landings. Deliveries of swordfish from the gillnet fishery operating off northern California and Oregon make Crescent City the second most important port in California. Albacore accounts for nearly all of the value of landings to the ports of Oregon and Washington.

Table 5 combines coast-wide landings by species and gear. Albacore is harvested by the troll fleets of all three states.



file

In California, the tropical tunas are taken mainly by purse-seiners, and swordfish and thresher shark primarily by the drift gillnet fleet. Please note that we have questions we have not had time to resolve regarding the accuracy of gear reporting, for example the repeated occurrence of pot gear being reported for the harvest of swordfish and thresher shark. We also regard the weights reported in 1991 for albacore, yellowfin, and skipjack tuna as preliminary data, which we are reviewing.

Table 6 shows the numbers of vessels reporting various frequencies of landings per year, total numbers of vessels and total numbers of landings. The large increase in the numbers of vessels between 1991 and 1992 is due largely to the recovery of the albacore fishery.

I hope this information is useful to you in preparation for the upcoming discussions with the Pacific Fishery Management Council regarding management of Pacific pelagic species. If you have questions regarding the data or require additional information please contact me at 310-980-4001 or Mr. Svein Fougner at 310-980-4034.

Sincerely,

Rod

Rodney R. McInnis
Acting Regional Director

Enclosure

cc: PFMC - L. Six

TABLE 1. COMBINED LANDINGS (ROUND WEIGHT) FOR CALIFORNIA, OREGON AND WASHINGTON

1991			1992			1993		
SPECIES	MTs	VALUE	SPECIES	MTs	VALUE	SPECIES	MTs	VALUE
YELLOWFIN	4,263	10,679,488	ALBACORE	4,836	11,405,175	ALBACORE	6,093	11,493,999
SWORDFISH	782	6,395,697	SWORDFISH	1,548	7,592,012	YELLOWFIN	3,744	9,895,124
SKIPJACK	3,552	2,911,069	YELLOWFIN	3,349	6,615,873	SWORDFISH	1,743	8,816,219
ALBACORE	1,846	2,895,136	SKIPJACK	2,586	1,547,177	SKIPJACK	4,602	2,507,826
THRESHER	379	973,856	BLUEFIN	1,087	1,184,179	BLUEFIN	528	845,002
BLUEFIN	114	116,004	THRESHER	325	467,691	THRESHER	307	476,765
OTHER TUNA	21	64,640	MAKO SHARK	140	227,472	MAKO SHARK	121	220,098
			OTHER TUNA	17	65,825	OTHER TUNA	42	282,205
TOTAL	10,958	24,035,890		13,888	29,105,404		17,179	34,537,239

TABLE 2. LANDINGS (ROUND WEIGHT) BY STATE

SPECIES	CALIFORNIA		OREGON		WASHINGTON	
	MTs	VALUE	MTs	VALUE	MTs	VALUE
1991						
ALBACORE	731	1,188,893	629	990,064	486	716,179
YELLOWFIN	4,263	10,679,488			1	9,968
SWORDFISH	782	6,395,697				
SKIPJACK	3,552	2,911,054				
BLUEFIN	114	116,004				
THRESHER	379	973,856				
OTHER TUNA	21	64,640				
TOTAL	9,843	22,329,632	629	990,064	487	726,147
1992						
ALBACORE	1,255	3,192,775	1,764	3,959,653	1,817	4,252,747
YELLOWFIN	3,349	6,615,873				
SWORDFISH	1,548	7,592,012			0.1	108
SKIPJACK	2,586	1,547,071				
BLUEFIN	1,087	1,184,179			0.5	569
THRESHER	324	466,055	0.6	1,087		
MAKO SHARK	140	227,472				
OTHER TUNA	17	65,825				
TOTAL	10,306	20,891,262	1,764	3,960,720	1,818	4,253,422
1993						
ALBACORE	1,826	3,621,626	2,149	3,860,083	2,118	4,012,291
YELLOWFIN	3,744	9,895,124				
SWORDFISH	1,742	8,810,947			0.6	5,272
SKIPJACK	4,602	2,507,826				
BLUEFIN	528	845,002				
THRESHER	307	475,470	0.4	445	0.3	850
MAKO SHARK	121	220,098				
OTHER TUNA	42	282,205				
TOTAL	12,911	26,658,299	2,149	3,860,527	2,119	4,018,413

TABLE 3. VALUE OF LANDINGS FOR TOP THREE PORTS BY STATE

1991		1992		1993	
CALIFORNIA					
SAN PEDRO/TERMINAL IS	15,349,730	SAN PEDRO/TERMINAL IS	10,838,008	SAN PEDRO/TERMINAL IS	15,507,593
SAN DIEGO	1,718,477	CRESCENT CITY	2,609,929	CRESCENT CITY	3,043,281
OAKLAND	998,453	SAN DIEGO	1,968,682	SAN DIEGO	1,786,355
OREGON					
NEWPORT	520,413	NEWPORT	2,305,440	NEWPORT	1,688,806
ASTORIA	205,975	ASTORIA	911,141	ASTORIA	1,110,982
COOS BAY	166,775	COOS BAY	338,411	COOS BAY	662,448
WASHINGTON					
WESTPORT	475,305	WESTPORT	2,807,376	ILWACO/CHINOOK	3,342,055
ILWACO/CHINOOK	175,904	ILWACO/CHINOOK	1,147,911	WESTPORT	551,773
BELLINGHAM BAY	20,683	SEATTLE	99,969	SEATTLE	51,108

TABLE 4. COMBINED LANDINGS (ROUND WEIGHT) BY PORT FOR CALIFORNIA, OREGON, AND WASHINGTON

STATE PORT	1991		1992		1993	
	MTs	VALUE	MTs	VALUE	MTs	VALUE
ALBACORE						
C SAN PEDROTI	338.1	596,070	1,202.2	2,897,576	1,759.3	3,335,832
O NEWPORT	346.0	520,413	1,037.8	2,305,394	1,008.6	1,658,539
W WESTPORT	321.6	475,085	648.0	1,705,974	741.1	1,468,647
C OAKLAND	247.0	351,170	466.0	1,147,236	507.0	1,110,982
O ASTORIA	129.8	205,975	388.0	910,004	303.8	662,343
W LILWAC/CHINOOK	119.9	175,886	92.8	214,318	265.7	639,231
O COOS BAY	103.7	166,775	182.0	430,023	287.4	566,427
C EUREKA	40.9	68,257	150.0	339,411	201.4	551,743
C MORRO BAY	38.1	53,845	145.5	329,330	226.4	352,688
O BROOKINGS	23.0	52,719	93.1	272,368	150.5	313,533
ALL OTHERS	134.09	229,959	398.4	944,721	393.8	803,933
TOTAL	1,045.9	2,895,136	4,853.7	11,400,175	6,003.0	11,493,999
YELLOWFIN TUNA						
C TERMINAL ISLAND	3,987.3	10,103,551	282.7	673,917	3,088.1	9,541,833
C SAN PEDRO	274.5	571,941	3,053.8	5,729,825	36.6	302,256
C MOSS LANDING	0.8	2,539	1.2	6,332	3.4	21,806
C SAN DIEGO	0.3	1,036	0.6	1,968	2.4	15,582
C SAN DIEGO	0.1	481	1.1	4,715	3.6	13,729
BDO						
TOTAL	4,283.0	10,679,458	3,349.4	6,618,873	3,744.1	9,609,134
SWORDFISH						
C SAN DIEGO	168.0	1,399,306	515.8	2,245,320	556.2	2,528,117
C SAN PEDROTI	115.5	993,302	156.8	880,094	281.3	1,619,180
C MOSS LANDING	88.0	693,953	142.8	678,633	204.7	1,290,179
C OAKLAND	76.7	624,012	128.2	623,477	123.8	589,154
C MORRO BAY	75.2	587,853	134.8	578,280	101.5	528,516
C MONTEREY	60.2	475,896	108.3	553,747	92.7	459,945
C FORT BRAGG	55.6	447,389	76.6	411,757	81.9	371,335
C SAN FRANCISCO	47.2	392,981	65.3	392,330	85.2	359,795
C OTHER SANTA BARBARA	24.8	210,336	67.7	378,229	52.2	228,641
C CRESCENT CITY	23.0	189,858	50.8	241,371	34.4	163,303
ALL OTHERS	51.87	419,879	63.6	410,604	127.1	740,035
TOTAL	782.4	6,395,697	1,548.0	7,592,012	1,742.9	8,818,218
SURFJACK						
C SAN PEDROTI	3,350.0	2,909,485	2,547.6	1,483,968	4,379.2	2,494,475
C MORRO BAY	1.1	690	37.7	52,823	20.8	12,467
OTHER			0.5	318	1.8	694
TOTAL	3,352.5	2,911,069	2,585.7	1,547,177	4,601.5	2,507,226
BLUEFIN TUNA						
C SAN PEDROTI	110.5	102,128	1,004.6	1,100,117	492.0	889,437
C SAN DIEGO	1.4	4,846	13.1	60,035	3.4	35,833
C OTHER SANTA BARBARA	1.0	3,532	3.1	6,474	10.7	35,485
C MORRO BAY	0.8	2,786	2.1	4,897	6.9	22,822
C MOSS LANDING	0.4	1,355	1.2	2,718	4.6	17,430
C FORT BRAGG	0.1	591	0.9	2,376	4.6	17,323
C MONTEREY	0.2	555	1.0	2,033	1.7	7,485
C OAKLAND	0.0	144	0.2	882	1.4	5,019
C SANTA BARBARA	0.0	50	1.1	2,747.0	2.5	12,446
OTHER CALIFORNIA						
TOTAL	114.4	116,004	1,087.2	1,184,179	527.9	845,002
THRASHER SHARK						
C SAN PEDROTI	98.8	298,928	76.2	118,628	128.1	201,758
C SAN PEDROTI	54.4	147,514	45.5	81,969	69.7	99,971
C MORRO BAY	62.5	144,133	58.5	75,914	44.3	81,741
C OTHER SANTA BARBARA	41.1	112,281	44.3	69,737	23.3	39,956
C SANTA BARBARA	40.1	55,384	43.1	58,233	8.6	14,532
C CRESCENT CITY	32.1	105,882	7.8	12,828	10.9	9,864
C MONTEREY	16.8	40,434	8.0	10,289	3.7	5,245
C OAKLAND	11.8	21,280	7.4	9,189	2.3	4,692
C MOSS LANDING	6.2	14,394	4.6	6,458	4.4	3,228
C SANTA CRUZ	3.4	9,294	23.4	15,026	10.9	15,821
C ALL OTHERS	11.4	24,412	23.4	15,026	10.9	15,821
TOTAL	379.1	973,956	324.8	467,991	307.3	478,785
MAKO SHARK						
C SAN DIEGO			43.4	73,985	93.2	58,347
C SAN PEDROTI			28.1	45,382	23.9	49,399
C CRESCENT CITY			17.9	27,156	16.6	31,378
C MORRO BAY			13.4	19,981	10.1	17,217
C OTHER CALIFORNIA			37.6	61,028	35.0	65,856
TOTAL			140.4	227,472	120.7	220,898
OTHER AND UNCLASSIFIED TUNAS						
C SAN PEDROTI	12.8	40,123	7.9	46,539	23.4	199,828
C SAN DIEGO	2.9	8,980	2.8	7,183	6.2	38,334
C MORRO BAY	1.6	5,244	2.1	5,228	3.3	10,620
C MONTEREY	1.1	3,300	3.0	4,243	2.9	10,882
C MOSS LANDING	0.7	3,055	1.1	2,632	1.9	5,890
OTHER CALIFORNIA	1.8	3,938	18.9	65,823	41.9	15,971
TOTAL	20.8	64,640	18.9	65,823	41.9	282,205
GRAND TOTAL	10,955	24,033,890	13,858	29,105,404	17,179	34,537,209

COMBINED LANDINGS (ROUND WEIGHT) BY GEAR FOR CALIFORNIA, OREGON AND WASHINGTON

1991		1992		1993			
MTs	VALUE	GEAR	MTs	VALUE	GEAR	MTs	VALUE
RE		ALBACORE			ALBACORE		
+ POLL+JIG	1,803.3	TROLL+HOOK&LINE	4,624.9	10,772,340	TROLL+HOOK&LINE	5,657.7	10,581,901
	31.3	UNKNOWN	148.2	449,813	SET NET	177.0	289,237
IC	4.4	SET NET	53.3	173,993	UNKNOWN	127.1	283,651
ER TRAWL	5.3	SEINE	7.6	5,010	DIPNET+SEINE	105.3	181,811
NET	0.7	LONG LINE	0.7	1,461	OTHER TRAWL	7.2	120,787
ER GEAR	1.0	OTHER GEAR	0.9	2,558	OTHER GEAR	18.8	36,613
AL	1,845.9	TOTAL	4,835.7	11,405,175	TOTAL	6,093.0	11,493,999
WFUN TUNA		YELLOWFIN TUNA			YELLOWFIN TUNA		
SE+DIP NET	3,697.2	SEINE+DIP NET	2,661.0	4,970,854	SEINE+DIPNET	2,498.1	5,353,248
E	527.4	HOOK AND LINE	528.9	1,139,938	HOOK AND LINE	766.7	3,625,738
UNKNOWN	38.2	UNKNOWN	156.2	493,028	UNKNOWN	473.3	884,778
- NET	0.1	SET NET	3.3	11,649	SET NET	3.9	20,991
NG LINE	0.0	OTHER GEAR	0.1	380	LONG LINE	1.9	10,047
	4,263.0	OTHER TRAWL	0.0	24	OTHER POT	0.1	322
		TOTAL	3,349.4	6,615,873	TOTAL	3,744.1	9,895,124
TAL		SWORDFISH			SWORDFISH		
RODFISH		SET NET	1,207.4	5,742,972	SET NET	1,162.4	5,505,624
HER NET	588.0	UNKNOWN	136.6	656,245	OTHER GEAR	260.0	1,639,584
UNKNOWN	92.4	OTHER GEAR	83.5	578,533	UNKNOWN	144.4	763,052
LL NET	43.3	LONG LINE	53.0	273,597	HOOK AND LINE	130.4	646,563
HER GEAR	12.9	HOOK AND LINE	30.2	161,191	LONG LINE	26.4	150,205
NG LINE	20.4	SEINE	13.2	73,206	SEINE	17.2	98,722
P NET	10.7	OTHER TRAWL	17.9	69,146	TROLL	0.9	7,380
OLE	9.5	OTHER POT	6.2	37,122	OTHER POT	1.1	5,089
HER POT	5.3	TOTAL	1,548.0	7,592,012	TOTAL	1,742.9	8,816,219
TOTAL	782.4	SKIPJACK TUNA			SKIPJACK TUNA		
PJACK TUNA		SEINE	1,100.5	683,459	DIPNET	2,261.1	996,968
OTHER NET	2,978.0	HOOK AND LINE	436.7	551,046	SEINE	1,481.4	866,488
POLE	441.8	DIP NET	987.3	297,525	HOOK AND LINE	572.4	491,686
UNKNOWN	132.7	UNKNOWN	60.6	14,689	UNKNOWN	284.6	151,281
	0.1	OTHER GEAR	0.7	458	OTHER GEAR	2.1	1,404
	3,552.5	TOTAL	2,585.7	1,547,177	TOTAL	4,601.5	2,507,827
		BLUEFIN TUNA			BLUEFIN TUNA		
UEFIN TUNA		SEINE	996.1	959,711	SEINE	452.1	551,912
OTHER NET	108.4	UNKNOWN	66.7	141,782	DIPNET	24.4	94,124
UNKNOWN	5.7	DIP NET	13.2	60,762	SET NET	22.1	80,873
LONG LINE	0.2	SET NET	7.5	18,390	OTHER GEAR	9.7	63,257
GILL NET	0.1	OTHER GEAR	1.7	3,534	UNKNOWN	19.5	54,837
TOTAL	114.4	TOTAL	1,087.2	1,184,179	TOTAL	527.8	845,002
		THRESHER SHARK			THRESHER SHARK		
HRESHER SHARK		SET NET	286.3	428,060	SET NET	225.5	349,649
OTHER NET	320.3	UNKNOWN	16.8	25,864	UNKNOWN	46.8	76,694
UNKNOWN	43.2	HOOK AND LINE	3.4	5,044	OTHER GEAR	20.4	26,164
GILL NET	6.8	OTHER GEAR	13.7	4,085	SEINE	7.5	12,155
POLE	4.7	OTHER POT	0.6	1,541	HOOK AND LINE	5.8	9,530
DIP NET	1.9	LONG LINE	1.7	1,467	TROLL	0.4	1,013
TROLL	1.1	OTHER GEAR	2.2	3,630	OTHER GEAR	1.1	1,561
OTHER GEAR	1.1	TOTAL	324.8	467,691	TOTAL	307.3	476,765
TOTAL	379.1	OTHER/UNCLASSIFIED TUNA			OTHER/UNCLASSIFIED TUNA		
OTHER/UNCLASSIFIED TUNA		OTHER HOOK&LINE	6.3	43,168	HOOK AND LINE	24.9	205,195
OTHER NET	14.8	SET NET	5.3	14,592	SET NET	8.3	27,701
POLE	2.1	SEINE	1.9	4,127	LONG LINE	3.1	22,551
LONG LINE	2.4	OTHER GEAR	3.3	3,938	OTHER GEAR	5.8	26,758
OTHER GEAR	1.4	TOTAL	16.9	65,825	TOTAL	41.9	282,205
TOTAL	20.6	MAKO SHARK			MAKO SHARK		
		SET NET	104.1	167,008	SET NET	73.1	132,198
		OTHER GEAR	36.3	60,464	OTHER GEAR	47.6	87,900
		TOTAL	140.4	227,472	TOTAL	120.7	220,098
			13,888	29,105,404		17,179	34,537,239
ND TOTAL	10,958		24,035,890				

TABLE 6. FREQUENCY OF LANDINGS
 BY VESSEL NUMBERS

LANDINGS PER YEAR	NO. OF VESSELS		
	1991	1992	1993
5	405	889	837
10	40	50	41
1-15	23	35	43
6-20	6	23	23
1-25		11	14
6-30		4	9
31-35		1	6
36-40			2
41-45			2
TOTAL VESSELS	474	1013	977
TOTAL LANDINGS	1402	3224	3796

Pacific Offshore Fishermen's Association

18212 Rosita St.-Tarzana, CA 91356

Tel: (818) 343-9927

FAX: (818) 881-5003

September 23, 1994

FAX to:

Clarence G. Pautzke, Executive Director
North Pacific Fishery Management Council
(907) 271-2817

Dear Mr. Pautzke,

Pacific Offshore Fishermen's Association represents the majority of Pacific swordfish and tuna fishermen based in the four western coastal states. As you may already be aware, we strongly oppose the Western Pacific Regional Fishery Management Council's intention to become sole authority for the management of Pacific highly migratory species.

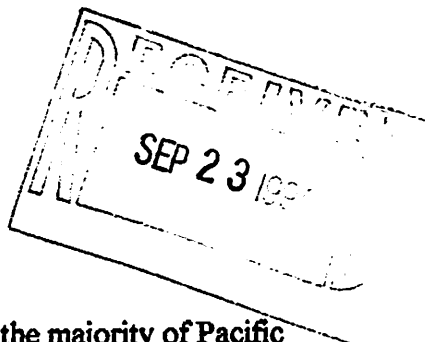
Because of an item listed on your draft agenda for your September North Pacific Council meeting; item C-2, Pacific Pelagics / Inter-Council cooperative management.; which may deal with this issue, we take this opportunity to outline our opposition in more detail for your consideration.

1. Representation: WPRFMC has no voting members that are even remotely connected to interests or concerns of west coast fishermen. How would west coast interests have a vote in decisions made that directly affect us?

2. Isolated management: Regional councils were established specifically to deal with regional issues. Hawaii is a very small geographically and very different culturally. Its needs and responsibilities are primarily focused on issues it understands because local fishermen and other industry and user groups have access to direct day to day contact with the council and can make their needs and concerns known. It's difficult enough for fishermen to communicate with their own regional councils, having management authority three thousand miles away is an enormous problem.

3. Unfamiliarity with fishing practices: The principle gear type for west coast swordfishermen is the drift gillnet, this gear has been outlawed in all of the territory that WPRFMC regulates.

4. Unilateral management: Highly migratory species that are targeted for management are now being fished by other nations. The U.S. share of overall Pacific highly migratory species harvest is less than 10%. To only subject U.S. fishermen to limitations based on stock decline brought about by overfishing from foreign fleets is



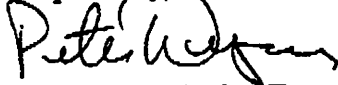
simply unfair. United Nations Convention on the law of the Sea, Article 64, calls for international management of highly migratory species.

5. Redundant authority: The Inter-American Tropical Tuna Commission may already have authority under the Convention of 1950 to undertake stock assessments and make management recommendations for highly migratory species in the eastern Pacific if the need for management of a species has been demonstrated. The IATTC is currently collecting swordfish data to determine stock condition.

6. No Justification: The west coast swordfishery has been monitored by California Fish & Game for years, the IATTC is in the process of stock assessment and has indicated that it will make management recommendations if it feels they are warranted. There is no data to indicate that this fishery is unhealthy at present. WPRFMC has their local FMP in place. The trend toward international management of highly migratory species will undoubtedly develop more fully in the near future. What is to be gained by WPRFMC's proposed action?

In Conclusion, POFA asks that at a minimum, any contemplated action by your council members be postponed until a thorough analysis of these factors we present can be undertaken. Any action at this time places an unfair burden on POFA membership because our swordfishing season is underway and we are individually unable to effectively represent our concerns because we are at sea.

Respectfully,



Pete Dupuy, Acting Executive Director
Pacific Offshore Fishermen's Association

cc.

Dave Allen
Linda Behnken
William E. Dilday
David L. Fluharty
Dave Hanson
Ronald Hegge
Richard B. Lauber
Steve Pennoyer
Wally Pereyra
Rudolph A. Rosen
Carl Rosier
Roger T. Rufe Jr.
Robin H. Samuelsen
Clem Tillion
Robert A. Turner