



WBA Response's to FMP BFT Management

I. The WBA is opposed to the NMFS Alternative F-1 , which would maintain BFT time-periods sub-quota allocations, and geographic for the General and Angling categories as established in the 1999 FMP. This dose not support the NCMFS petition to amend current BFT criteria and create a winter subquota time period. The WBA supports Alternative F-3, which amends the management procedures regarding General category time-periods, sub-quota, as well as geographic set-asides to allow for future adjustments to take place via regulatory framework action as the preferred Alternative this allows a fishery that supports all geographic areas equal access per the Magnuson-Stevens Act.

II. The WBA is in support of Alternative F-3(a) to divide the coast wide General Category 8 distinct time-periods that correspond to each month from June through January specifically 12.5 percent to each time-period this allows all geographic areas and a coast wide fishery per the Magnuson-Stevens Act. This allows if found in the future that it is necessary to go to a 12 month fishery that this action could take place via regulatory frame work action. The WBA and its membership supports F-3(a) & F-3(d) and is consistent with the NCMFS petition and have enclosed 9200 signature's supporting this action.

III. The WBA is in support of Alternative F-(d) to divide the coast wide General Category 5 distinct time-periods that correspond to June-August (38.7%) September (26.6%), October-November (13.0%), December (10.8), January (10.9%). This alternative is constant with the NCNFS petition although alternative F-3(a) is our preferred as it also is more in line with the Magnuson-Stevens Act. The WBA and its membership supports F-3(d) & F-3(a) and are consistent with the NCMFS petition and have enclosed 9200 signature's supporting this action.

IV. The WBA is opposed to the NMFS Preferred Alternative F4 as to the removal of the North/South line for the Angling Category. Until MNFS can fix the LPS Survey removing this line only better's the chance the southern winter BFT angling fishery will be shut down as there is no way to account for these catch rates in a timely manner. The WBA strongly supports the elimination of the LPS and use these funds to help each state develop a tail tag program for the angling BFT fishery. **We do not support F4.**

V. The WBA is opposed to the NMFS Preferred Alternative F5, F6, and F7. We think its about time that NMFS looks at what a complicated mess they have made out of very simple process. The Magnuson-Stevens Act clearly states that this is a coast wide fishery to allow all geographic areas equal opportunity to all US fisherman. The fishery has changed a lot over the past several years and NMFS has already the tools and previsions in place to make in season transfers and adjustments to allow the utilization of the ICCAT Treaty given quota and its time that we are allowed to catch this quota before Canada, México or Japan comes after it, which means that we should fish 12 months a year which the opening up months February, March April and May can be handled via regulatory frame work action. **The WBA and all other user groups support the unitization of our fishery before we start giving up Quota to other Countries.**

V. We do not support Alternative's G1 but do support G2 Shift the fishing year to January 1 to December 31 for all HMS.

VI. We do support Alternative H4 Authorize green stick fishing gear for the commercial harvest of Atlantic BAYS Tunas.