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March 31, 2025

Mary Wahl  
Chair  
Oregon Fish and Wildlife Commission  
4034 Fairview Industrial Drive SE  
Salem, OR 97302

Dear Chair Wahl,

**The Oregon Albacore Commission (OAC) respectfully requests that the Oregon Fish and Wildlife Commission review the rule pertaining to the 25 fish per day bag limit for recreational albacore fishermen.**

The OAC is an industry-funded state commodity commission under the Oregon Department of Agriculture representing the Oregon commercial albacore fishing industry. The commission is comprised of both commercial fishermen and first receiver/processors. At our December 3, 2024 meeting, commissioners unanimously approved writing this letter requesting that the ODFW Commission review this issue and make a rule change as recommended herein.

The OAC has, for many years, had concerns regarding two main issues.

1. The increasing capitalization of recreational vessels.
2. The illegal sale of recreationally caught albacore.

The 25 fish bag limit was originally intended to allow for a single recreational fisherman to catch a limit from a small boat on those rare occasions when albacore tuna came near enough to shore for the typical recreational vessel to get enough to feed their extended family. The 25 fish bag limit has attracted “recreation” that looks nothing like that as intended.

There is now a sizable fleet of dedicated, custom built recreational vessels, each costing up to hundreds-of-thousands-of-dollars with the ability to travel, at speed, 50 plus miles offshore, carrying up to 6 passengers and having the capacity to pack up to 200 fish at a time. These boats are trailered anywhere in the state overnight enabling them to quickly access “bites” and weather conditions that allow them to “limit out” over and over during the course of the summer. This is clearly not the “feed one’s family” model as intended.

We've known for decades that the 25 fish per day bag limit has been problematic. I believe that such a high bag limit with no annual cap in large part contributed to the over-capitalization of the

recreational fleet. For years it was common knowledge that recreational fish were being canned, both at home and at licensed canners, and were being sold to snow-bird markets in the southwest. During the same period as that was happening commercial fishing businesses, with the support of the Oregon Albacore Commission, were trying to develop private label markets to mitigate for the loss of interest in our fishery by the "big three" tuna canners who went overseas in the late nineties.

Recently specialty buyers have sprung up that buy specifically from the "sport commercial" boats who, in my opinion, are cosplaying as commercial fishermen, so they don't have to follow the recreational bag limit rules. The buyers of those fish then corrupt the market with cheap fish therefore souring the market for commercial fishermen who are trying to earn a living out of the local marketplace.

- Each 25 fish bag limit of 14-pound average weight fish yields between 350 and 450 cans/jars of meat.
- Recreational boats often offer “seats” in exchange for “gas money”, which skirts the legal bounds of a charter operation, negatively impacting the legally licensed chart industry.
- Illegal Albacore sales are now significant enough to have triggered a response from Oregon State Police (OSP).
- Recreational catch in 2023 showed a 9% INCREASE (Source ODFW)
- Commercial landings in 2023 saw a 63% DECREASE (Source ODFW)
- The average number of recreational fish landed per person per recreational day in 2023 was 3.8 (Source ODFW)

**After considerable discussion the OAC concluded that 75 fish per season is their recommended limit for recreational fishermen.**

Thank you for your consideration.

Sincerely,



Rick Goche  
Chair  
Oregon Albacore Commission