October 31, 2011

Mr. Dan Wolford, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Re: Season start dates for the pacific sardine fishery

Mr. Chairman and Council Members,

I am writing today to ask for a change in the management measures for the pacific sardine fishery. When Amendment 11 to the CPS FMP was implemented the start dates did not seem problematic but some adjustment to these dates could improve the fishery. I am requesting that the Council consider modifying the season start dates for both the July 1st and September 15th fishery periods.

The basis of this request is simple: Weekends and Holidays. The July 1st start is difficult because the Independence Day holiday is so close that many companies have difficulty acquiring a sufficient workforce because many who could work choose to celebrate a National holiday. Last year the container yard longshoremen took July 5th off too which made shipping more difficult. Additionally, opening on a Friday or weekend makes shipping logistics difficult and more costly for processors to acquire shipping containers.

I propose moving the season start dates for the last two harvest guideline releases to the second Monday in July and the second Monday in September. Doing this would alleviate any concern over starting operations on a weekend and would also eliminate the difficulty of attempting to operate on one of our Nation’s most important holidays.

I do not feel this suggestion would significantly alter the structure or prosecution of the fishery nor would it give any advantage or disadvantage to any particular user group or region. It is just a simple suggestion which would alleviate a lot of industry headache and help the fishery to operate more smoothly and predictably which would benefit all participants.

Thank you for your consideration of this matter.

Regards,

Ryan Kapp