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AUG 20 2002

PFMC

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Mr. Rod McInnis, Regional Administrator  
National Marine Fisheries Service  
Southwest Region  
501 W Ocean Blvd, Suite 4200  
Long Beach, CA 90802-4213

August 16, 2002

Dear Mr. McInnis:

This letter serves as a formal request to the National Marine Fisheries Service to implement an emergency rule which would reallocate the current coast wide sardine harvest guideline prior to October 1<sup>st</sup>. The request is being made on behalf of the West Coast Seafood Processors Association and the following companies: Pacific Seafood Group; Astoria Pacific Sardine; Del Mar Seafoods; Monterey Fish Company; California Shellfish Company; Qualy Pak Specialty Foods; Merino Seafood Inc.; Jessie's Illwaco Fish Company; the Port of Ilwacoco; and the various fishermen and crew who currently fish for these companies.

As you know, the Coastal Pelagic Species Fishery Management Plan (CPS FMP) allows for a reallocation of all unutilized quota from the two sardine management areas on October 1<sup>st</sup> of each year. This unused harvest is combined and then split 50/50 between the two allocation zones.

NMFS data indicate that as of July 31, 2002, 14,793 mt of sardines have been landed in the northern management area. More recent data from Oregon and Washington indicate that through August 11<sup>th</sup>, a combined total of 20,314 mt of sardines have been landed into both states. Data on August landings of sardines in northern California is not yet available, although processors note that prior to August 12<sup>th</sup>, landings were minimal. On August 12<sup>th</sup>, sardine landings began to increase rapidly.

The coast wide harvest guideline of 118,442 mt currently allocates 39,481 mt to the northern area (Monterey, Oregon & Washington) and 78,961 mt to southern California. Based on the most recent information available, 19,167 mt remains of the northern allocation, with fishermen having already utilized 51% of the allocation. Southern California fishermen have utilized 35% of the southern allocation, leaving 51,340 mt currently unharvested.

Washington and Oregon processors have been packing an average of 600 mt of sardine a day (300 mt in each state). In Washington and Oregon combined, processors have the capacity to pack at least 850 mt a day. The Monterey fishery has picked up significantly and expects to top off at an average daily production of 800 mt. The Monterey processors have the infrastructure to pack up to 1,000 mt a day of product. Therefore, weather permitting, processors operating under the northern allocation will be packing an average of 1,400 mt of sardines per day. At this rate, the entire northern allocation will be reached by September 1<sup>st</sup>. Once this happens, all

fishing operations in the northern management area will be forced to shut down until NMFS activates the automatic reallocation of unused quota in October. This equates to an entire month without fishing for Oregon, Washington and Monterey. This type of closure will cause significant economic hardship in northern California, Oregon and Washington ports. This closure can be avoided if NMFS chooses to implement an emergency rule that reallocates unused portions of the coast-wide quota as early as possible, or at least by September 1<sup>st</sup>. As noted above, the southern management area has 51,340 mt remaining on the allocation which is more than the area has landed in a full season during either 2000 or 2001. Historically, the catch in southern California has slowed down beginning in September.

The first national standard for fishery conservation and management in the Magnuson-Stevens Fishery Conservation and Management Act states:

*(1) Conservation and management measures shall prevent overfishing while achieving on a continuing basis, the optimum yield from each fishery for the United States fishing industry*

If the reallocation date is not moved forward, the optimum yield for sardines will not be achieved. Since the implementation of the CPS FMP in 1999, two and a half sardine seasons have passed. In 2000, 59,019 mt of sardines were left unharvested. In 2001, 57,436 mt remained at the end of the season. However, as sardine fisheries continue to expand in Oregon and Washington, the amount of harvest associated with the northern allocation has grown steadily. While the Council's Coastal Pelagic Species Advisory Subpanel has begun to discuss long-term solutions to this allocation problem, there will not be a solution available for the current problem in time to help the ports for this season. When various bodies brought this potential problem before the Council in the past, the Council chose to wait and see if a problem actually developed. A problem has now developed and NMFS intervention is necessary to avoid a possible shut-down in the fishery.

We ask that you review the available data and move the reallocation to the soonest date practicable. It is understood that this emergency declaration would only be for this fishing season and that the continued dialogue for identifying long-term solutions will be continued. In fact, the Council's CPS Advisory Subpanel will be taking up this issue at the September Council meeting. The west coast sardine fishery is an extremely healthy one. Fish are available to be caught in the northern management area and there is currently a high demand for this fish. This demand is expected to continue through the end of the year. It would be unfortunate if whole sectors of the industry were forced to shut down simply because an automatic reallocation could not be implemented.

I am available at the above number to answer any questions. I and all the companies listed look forward to your response.

Sincerely,



Heather M. Munro, President  
Munro Consulting

cc Mr. Rod Moore, West Coast Seafood Processors Association  
Mr. Jay Bornstein, Astoria Pacific Sardine  
Mr. Daryl Kapp Astoria Pacific Sardine

Mr. Frank Dulcich, Pacific Seafood Group  
Mr. Joe Cappuccio, Del Mar Seafoods  
Mr. Sal Tringali, Monterey Fish Company  
Mr. Anthony Tringali, Monterey Fish Company  
Mr. Tom Libby, Point Adams Packing Company  
Mr. Robert Cigliano, Qualy-Pak Specialty Foods  
Mr. Dennis Rideman, Moreno's Seafood Inc  
Mr. Pierre Marchand, Jessie's Ilwacco Fish Company  
Mr. Jerry Thon, Astoria Holdings Company  
Mr. Joe Childers, Childers and Associates  
Mr. Mack Funk, Port of Ilwacco  
Mr. Rob Zuanich, Purse Seine Vessel Owners Association  
Mr. Rob Ross, California Fisheries and Seafood Institute  
Ms. Diane Pleschner, California Wetfish Producers Association  
Dr. Jeffrey Koenings, Washington Department of Fish & Wildlife  
Mr. Phil Anderson, Washington Department of Fish & Wildlife  
Ms. Michele Robinson, Washington Department of Fish & Wildlife  
Ms. Patty Burke, Oregon Department of Fish & Wildlife  
Mr. Burnie Bohn, Oregon Department of Fish & Wildlife  
Ms. Jean McCrae, Oregon Department of Fish & Wildlife  
Mr. LB Boydston, California Department of Fish & Wildlife  
Ms. Marija Vojkovich, California Department of Fish & Wildlife  
Mr. Hans Radtke, Chair, Pacific Fishery Management Council  
Mr. Don McIsaac, Executive Director, Pacific Fishery Management Council  
Coastal Pelagic Species Management Team  
Coastal Pelagic Species Advisory Subpanel  
Mr. Jim Morgan, National Marine Fisheries Service  
Mr. Svein Fougner, National Marine Fisheries Service

**CALIFORNIA WETFISH PRODUCERS ASSOCIATION**

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**2194 SIGNAL PLACE  
SAN PEDRO, CA 90731**

**AUG 22 2002**

**PFMC**

**AUGUST 20, 2002**

VANESSA DELUCA  
STATE FISH  
COMPANY

JOHN CAR  
TRI-MARINE FISH  
Co.

PETE GUGLIELMO  
SOUTHERN CA  
SEAFOOD

FRANK TOMICH  
TOMICH BROS.  
SEAFOOD

PETER DIVONA  
CRS / STANDARD  
SEAFOOD

JOE BURCH  
OCEAN GEM  
SEAFOOD

MR. ROD MCINNIS, REGIONAL ADMINISTRATOR  
NATIONAL MARINE FISHERIES SERVICE – SWR  
501 W. OCEAN BOULEVARD, SUITE 4200  
LONG BEACH, CA 90802-4213

DEAR ROD,

WE'RE WRITING IN RESPONSE TO THE FORMAL REQUEST FOR EMERGENCY REALLOCATION OF SOUTHERN CALIFORNIA'S SARDINE HARVEST GUIDELINE SUBMITTED BY NORTHERN PROCESSING INTERESTS. WE WOULD GREATLY APPRECIATE YOUR CONSIDERATION OF THE FOLLOWING POINTS BEFORE MAKING A DECISION ON THIS SERIOUS ISSUE.

AS I'M SURE YOU'RE AWARE, SOUTHERN CALIFORNIA'S WETFISH INDUSTRY, INCLUDING BOTH FISHERMEN AND PROCESSORS, EXPRESSES GRAVE CONCERN OVER THE CURRENT UNBRIDLED EXPANSION OF THE SARDINE FISHERY IN THE PACIFIC NORTHWEST, EXPANSION THAT IS OCCURRING IN THE ABSENCE OF DIRECT RESEARCH ON STOCKS IN THAT AREA.

AS WE'VE DISCUSSED BEFORE, AT THE TIME CALIFORNIA'S SARDINE FISHERY CAME UNDER FEDERAL MANAGEMENT, FISHERY MANAGERS DID NOT ENVISION A FISHERY IN THE PACIFIC NORTHWEST, THUS THE TRADITIONAL HARVEST STRATEGY ALLOCATING A THIRD OF THE QUOTA TO NORTHERN CALIFORNIA AND TWO-THIRDS TO SOUTHERN CALIFORNIA WAS ADOPTED INTO THE CPS FMP WITH NO THOUGHT THAT AN OPEN ACCESS FISHERY OUTSIDE CALIFORNIA WOULD DEVELOP, MUCH LESS EXPAND TO THE DEGREE THAT IT HAS. FISHERY SCIENTISTS EXPRESS CONFIDENCE IN THE STOCK ASSESSMENTS DEVELOPED FOR CA WATERS; HOWEVER THE PROJECTION OF COASTWIDE BIOMASS IS EXTRAPOLATED WITH A FAIR BIT OF UNCERTAINTY ATTACHED, AS TO DATE NO BASELINE SURVEYS OF SPAWNING BIOMASS HAVE BEEN CONDUCTED IN THE PACIFIC NORTHWEST, OR, FOR THAT MATTER, EVEN AS FAR NORTH AS SAN FRANCISCO. LACK OF FUNDING IS THE USUAL REASON GIVEN FOR THIS OMISSION.

CALIFORNIA'S WETFISH INDUSTRY SUFFERED THROUGH A SIMILAR SCENARIO A DECADE AGO, WHEN FISHERMEN REPORTED A HUGE BODY OF FISH IN THE OCEAN, BUT HARVEST QUOTAS WERE SMALL DUE TO LACK OF MONEY TO FUND THE NECESSARY RESEARCH. THE INDUSTRY RESPONDED BY COOPERATING, THROUGH THE CALIFORNIA SEAFOOD COUNCIL AND OUT OF POCKET, TO HELP FUND INDEPENDENT RESEARCH (WHICH LED TO DEVELOPMENT OF THE ORIGINAL CANSAR MODEL) AND EXPANSION OF SPAWNING BIOMASS SURVEYS. IN ADDITION, THE INDUSTRY PAYS A VERY HIGH LANDING TAX FOR SARDINES, WHICH HAS CONTRIBUTED MORE THAN \$2 MILLION TO THE STATE IN THE PAST THREE YEARS.

BY COOPERATING IN THE JOINT STATE-FEDERAL BIOMASS SURVEYS, WE WERE ABLE TO FURTHER KNOWLEDGE OF CALIFORNIA'S SARDINE RESOURCE, LEADING TO A FIVEFOLD INCREASE IN QUOTA, WHICH JUMPED FROM 12,000 TONS TO 54,000 TONS IN ONE YEAR DUE TO THE EXPANDED RESEARCH. TO DATE WE HAVE SEEN NO SIMILAR EFFORTS BY THE PACIFIC NORTHWEST INDUSTRY, NOR COOPERATION FROM THE NORTHWEST REGION, TO HELP FUND THE RESEARCH ESSENTIAL FOR ACCURATE MANAGEMENT OF THE FISHERY. FOLLOWING PRECAUTIONARY PRINCIPLES MANDATED IN THE MAGNUSON ACT, THE SARDINE HARVEST IN THE PACIFIC NORTHWEST SHOULD NOT BE ALLOWED TO EXPAND ABSENT RESEARCH TO MEASURE THE SPAWNING BIOMASS IN THAT AREA. FUTURE QUOTAS SET FOR THE PACIFIC NORTHWEST SHOULD BE BASED ON THOSE ASSESSMENTS.

WE WOULD ALSO APPRECIATE YOUR CONSIDERATION OF THE FOLLOWING POINTS, ADDRESSING ARGUMENTS MADE IN THE REQUEST FOR EMERGENCY ACTION REGARDING PROCESSING CAPACITY AND CURRENT UNFULFILLMENT OF THE SOUTHERN CALIFORNIA HARVEST ALLOCATION.

1. PLEASE CONSIDER THE EXTREME HARDSHIP THAT FACED SOUTHERN CALIFORNIA FISHERMEN AND PROCESSORS IN 2002, PRECIPITATED BY THE CLOSURE OF MAJOR MARKETS DUE TO VHS VIRUS AND DOMOIC ACID. SARDINE HARVESTING IN SOUTHERN CALIFORNIA VIRTUALLY CEASED FOR A SIGNIFICANT PART OF THE YEAR DUE TO THESE ABNORMAL CONSTRAINTS. RECENTLY AUSTRALIA REOPENED ITS MARKET TO THE IMPORTATION OF SARDINES AND MACKEREL. FURTHER, MARKET RESTRICTIONS CAUSED BY THE FINDING OF DOMOIC ACID IN SOUTHERN SARDINES HAVE BEEN LIFTED, THUS THE SOUTHERN CALIFORNIA WETFISH INDUSTRY CAN FINALLY MAKE UP FOR LOST TIME. SEPTEMBER IS TYPICALLY A STRONG HARVEST MONTH IN SOUTHERN CALIFORNIA, AS WELL AS THE BEGINNING OF THE PEAK HARVEST SEASON. FISHING AND PACKING AT PEAK CAPACITY, SOUTHERN CALIFORNIA PROCESSORS COULD UTILIZE THE ENTIRE REMAINING SOUTHERN ALLOCATION BEFORE THE END OF SEPTEMBER, WEATHER PERMITTING (EMPLOYING A FORMULA SIMILAR TO THE PROJECTION GIVEN IN THE REQUEST FOR EMERGENCY REALLOCATION).

2. REGARDING THE POTENTIAL SHUT-DOWN OF THE MONTEREY INDUSTRY ALLEGED IN THE REQUEST, WE POINT OUT THAT IN THE PAST, MONTEREY PROCESSORS HAVE HARVESTED SARDINES IN SOUTHERN CALIFORNIA IN SEPTEMBER, WHICH WERE LANDED IN PT. HUENEME AND TRUCKED TO MONTEREY. IN FACT MONTEREY PROCESSORS ENJOY THE BEST OF BOTH WORLDS, ABLE TO FISH ON BOTH THE NORTHERN AND SOUTHERN SUB-ALLOCATIONS. WE WOULD STRONGLY ENCOURAGE THE PACIFIC NORTHWEST INDUSTRY AND NORTHWEST REGION, IF INTERESTED IN INCREASING THEIR HARVEST ALLOCATION, TO ACTIVELY PROMOTE AND SPONSOR THE RESEARCH NECESSARY TO DETERMINE THE EXTENT OF SPAWNING BIOMASS IN THAT AREA, THE SIZE OF OVER-WINTERING STOCKS, IF ANY, AND WHETHER OR NOT A SEPARATE SUBPOPULATION EXISTS. AS NOTED ABOVE, A SUB-ALLOCATION FOR THE PACIFIC NORTHWEST SHOULD BE BASED ON THOSE ESTIMATES, RATHER THAN EXTRAPOLATED FROM SARDINE STOCKS SURVEYED IN SOUTHERN CALIFORNIA.

3. A FEW ADDITIONAL COMMENTS ON PROCESSING CAPACITY, WE NOTE THAT THE NORTHERN FISHERY HAS UTILIZED JUST OVER HALF OF ITS SUB-ALLOCATION (51%, ACCORDING TO THE LETTER), NEARING THE END OF THE PEAK HARVEST PERIOD IN THE PACIFIC NORTHWEST, AND MORE THAN HALFWAY THROUGH THE SUMMER SEASON. EXAMINING PRIOR YEAR LANDINGS, JULY AND AUGUST ARE THE PEAK HARVEST MONTHS IN THE PACIFIC NORTHWEST, AND MONTEREY'S PEAK ACTIVITY GENERALLY COMES LATER IN THE FALL. WE FEEL THE PROJECTIONS GIVEN IN THE REQUEST FOR EMERGENCY ACTION ARE VERY OPTIMISTIC, AND PERHAPS UNREALISTIC, GIVEN THE ACKNOWLEDGEMENT THAT 19,000 TONS REMAIN ON THE NORTHERN SUB-ALLOCATION THROUGH MID-AUGUST. IT WOULD SEEM THAT THE NORTHERN FISHERY IS RIGHT ON COURSE.

FURTHER, AS NOTED IN THE LETTER, THE ISSUE OF FUTURE ALLOCATION SCHEMES WILL AGAIN BE DISCUSSED AT THE SEPTEMBER CPS ADVISORY SUBPANEL MEETING. SOUTHERN CALIFORNIA INTERESTS WILL BE PRESENT AND LOOK FORWARD TO THOSE DISCUSSIONS.

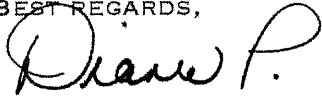
4. ONE FURTHER POINT TO CONSIDER REGARDING PREMATURE REALLOCATION OF THE SOUTHERN SARDINE SUBQUOTA IS THE PENDING EL NIÑO FORECAST FOR THIS YEAR. THIS ENSO EVENT, EVEN THOUGH EXPECTED TO BE MILD, LIKELY WILL HAVE A SIGNIFICANT, PERHAPS HUGE, IMPACT ON THE SOUTHERN CALIFORNIA FISHERY; THE 1992 EL NIÑO IS AN EXAMPLE. IN THE ABSENCE OF SQUID, SOUTHERN CALIFORNIA FISHERMEN AND PROCESSORS WILL FOCUS ON SARDINES TO MAINTAIN OPERATIONS, THUS NOVEMBER, DECEMBER AND JANUARY WILL BE IMPORTANT MONTHS FOR THE SOUTHERN SARDINE HARVEST. REALLOCATING SARDINE SUBQUOTA EARLY, BEFORE THE SOUTHERN FISHERY HAS A CHANCE TO UTILIZE ITS FULL ALLOCATION IN SEPTEMBER, WILL HAVE A NEGATIVE IMPACT ON THE FISHERY, PRECIPITATING SIGNIFICANT ECONOMIC HARDSHIP LATER IN THE YEAR, WHEN THE SARDINE HARVEST WILL BE IMPORTANT.

IN CLOSING, WE AGAIN REITERATE OUR CONCERN OVER ALLOWING EXPANSION OF THE PACIFIC NORTHWEST FISHERY WITHOUT THE REQUISITE BASELINE RESEARCH ON THE FAR NORTHERN STOCKS. ALLOCATION NOTWITHSTANDING, THE LARGER ISSUE IS - WHAT IS THE IMPACT OF INCREASED HARVESTING IN THE PACIFIC NORTHWEST ON SARDINE SPAWNING BIOMASS? IS THIS HARVEST REMOVING SPAWNERS THAT ARE ESSENTIAL TO THE TRADITIONAL FISHERY? IS THERE AN OVERWINTERING BIOMASS, OR PERHAPS A SEPARATE SUBSTOCK? AT PRESENT BIOLOGISTS HAVE LITTLE KNOWLEDGE OF THOSE STOCKS, EXCEPT THAT THEY ARE LARGE FISH. THE EXISTENCE OF AN OVERWINTERING STOCK OR EVEN A SEPARATE SUBSTOCK ARE CRITICAL PIECES OF KNOWLEDGE ON WHICH TO DETERMINE A SUBQUOTA FOR THE REGION. ALLOWING CONTINUED EXPANSION WITHOUT THAT KNOWLEDGE IS INVITING DISASTER, PERHAPS ONE AS DIRE AS THE CURRENT GROUND FISH CRISIS, WHICH CAME ABOUT THROUGH INADEQUATE RESEARCH.

IN MAKING YOUR DETERMINATION, PLEASE CONSIDER THAT CALIFORNIA REPRESENTS CLOSE TO 90 PERCENT OF THE HISTORIC SARDINE FISHERY; OREGON AND WASHINGTON COMBINED ACCOUNTED FOR ONLY 2.7 PERCENT OF TOTAL COASTWIDE LANDINGS DURING THEIR ENTIRE PERIOD OF ACTIVITY—1935-36 TO 1948-49. CALIFORNIA'S WETFISH INDUSTRY REPRESENTS 84 PERCENT BY VOLUME OF THE ENTIRE FISHING INDUSTRY IN CALIFORNIA TODAY, AND SARDINES CONTRIBUTE A MAJOR PORTION OF THOSE LANDINGS. AS WE KNOW, THE QUOTA IS DECLINING AS THE OCEAN ENTERS A COLD-WATER PDO CYCLE; IN LIGHT OF THIS, FURTHER GROWTH OF THE PACIFIC NORTHWEST SARDINE FISHERY IS MOST LIKELY UNSUSTAINABLE. FINALLY, THE LACK OF KNOWLEDGE OF THE RESOURCE BEYOND CALIFORNIA, COUPLED WITH THE CURRENT UNBRIDLED EXPANSION OF THE PACIFIC NORTHWEST FISHERY, SHOULD RING LOUD ALARM BELLS AND EMPHASIZE THE ABSOLUTE NEED TO DO THE EXPANDED RESEARCH QUICKLY. PERHAPS THIS REQUEST FOR EMERGENCY ACTION WILL SERVE AS THE CATALYST FOR FUNDING.

THANK YOU, ONCE AGAIN, FOR CONSIDERING THESE POINTS. WE REQUEST THAT YOU DEFER YOUR DECISION UNTIL RECEIVING THE LATEST SCIENTIFIC DATA ON THE STATUS OF SARDINE STOCKS, OR AUTOMATIC REALLOCATION SET FOR OCTOBER 1 OCCURS, WHICHEVER COMES FIRST.

BEST REGARDS,



DIANE PLESCHNER-STEELE  
FOR CALIFORNIA WETFISH PRODUCERS ASSOCIATION

CC: JIM MORGAN, NMFS  
JOHN HUNTER, NMFS  
PAUL SMITH, NMFS  
KEVIN, HILL, CDFG  
LB BOYDSTUN, CDFG  
MARIJA VOJKOVICH, CDFG  
PATTY WOLF, CDFG  
HANS RADKE, CHAIR, PFMC  
DON MCISAAC, EXEC. DIRECTOR, PFMC  
DAN WALDECK, CPS STAFF, PFMC





CITY OF ASTORIA  
OFFICE OF THE MAYOR

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AUG 20 2002

PFMC

August 12, 2002

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384

Dear Councilors:

I am writing on behalf of the citizens of Astoria and at the request of the Astoria City Council to ask for your full consideration of proposals before you regarding adjustments to the Coastal Pelagic Species Fishery Management Plan.

Astoria has a very long and very rewarding history. Fish and fisheries have been a constant central thread in that history. In recent decades most developments in our fisheries have been negative, much to the decrement of Astoria's economic well being. The recent emergence of the sardine fishery has been a beacon of hope for improved economic times. There are now four sardine-processing operations in Astoria providing jobs and an influx of capital and operating funds to the area.

We are advised that your agenda includes a request for an adjustment of sardine quotas between Southern Region and Northern Region areas. We believe that this action is appropriate and indicated. We ask that you give it your fullest professional consideration. We are confident that you will arrive at a decision that is just and equitable. Thank you for your consideration.

Sincerely,

THE CITY OF ASTORIA

Willis L. Van Dusen  
Mayor





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August 13, 2002

PFMC

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384

Dear Councilors;

I am writing on behalf of the Port of Astoria district and at the request of the Port of Astoria Commission to ask for your full consideration of proposals before you regarding adjustments to the Coastal Pelagic Species Fishery Management Plan.

The north coast of Oregon has a very long and very rewarding history. Fish and fisheries have been a constant central thread in that history. In recent decades most developments in our fisheries have been negative, much to the decrement of our regional economic well being. The recent emergence of the sardine fishery has been a beacon of hope for improved economic times. There are now four sardine-processing operations in Astoria providing jobs and an influx of capital and operating funds to the area. Three of these facilities are located on port owned property generating over 120 jobs.

We are advised that your agenda includes a request for an adjustment of sardine quotas between Southern Region and Northern Region areas. We believe that this action is appropriate and indicated. We ask that you give it your fullest professional consideration. We are confident that you will arrive at a decision that is just and equitable. Thank you for your consideration.

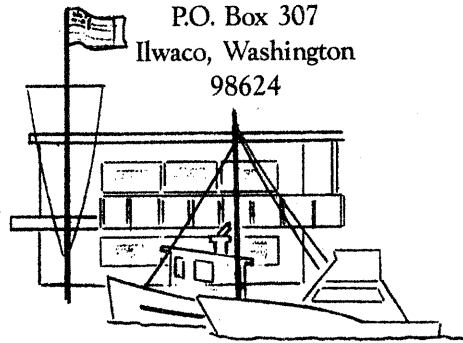
Sincerely,  
The Port of Astoria



Glenn Taggart  
Commission President

Commissioners  
FRANK UNFRED  
chairman  
PAUL C. POLILLO  
secretary  
JIM STIEBRITZ

# PORT OF ILWACO



Mack Funk  
manager  
Area Code 360  
Phone 642-3143  
FAX 642-3148  
www.portofilwaco.c

August 5, 2002

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384

RE: Sardine Allocations

The sardine fishing industry is rapidly growing at the Port of Ilwaco. Due to favorable ocean conditions, sardines are one of the few bright spots in the commercial fishing business. There are two processors at the port, Jessie's Ilwaco Fish Co. and Sunrise Seafoods, and they are the largest employers in our small coastal community.

For that reason we are vitally interested in the sardine regulations and we have recently become aware of a problem that needs to be corrected. The sardine catch is allocated between two distinct geographic regions:

1. Southern California and
2. Northern California, Oregon and Washington

Currently, the management plan contains an automatic provision that reallocates total unharvested sardines 50:50 between Northern and Southern regions on October 1<sup>st</sup> each year. The problem is that date is too late, the fishery is ending due to weather. We recommend that the reallocation date be set on June 15 and the PFMC amend Section 5.2.2 of the Coastal Pelagic Species Fishery Management Plan as follows:

### Section 5.2.2 Formulas for Allocating Pacific Sardine

The northern area allocation is 33% of the Pacific sardine harvest guideline, and the southern area allocation is 66% of the Pacific sardine harvest guideline. ~~Nine months after the start of the fishing season,~~ *Six months after the start of the fishing season, but not later than June 15 of each year,* any uncaught portion of the sardine harvest guideline will be totaled and reallocated with 50% of the total allocated to the northern area and 50% of the total allocated to the southern fishery area. Reallocation will be carried out by the NMFS Regional Administrator as an automatic measure as described in Section 2.1.

Thank you for your consideration,

A handwritten signature in cursive script, appearing to read 'Frank Unfred'.

Frank Unfred  
Chairman

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AUG 12 2002

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