

Heather Munro Mann June 2004
Munro Consulting, Inc
PO Box 1515,
Newport, OR 97365

Donald K. Hansen, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

June 16, 2004

RE: June Council Agenda Item F.3.c.

Dear Chairman Hansen & Council Members:

These comments are respectfully submitted on behalf of the West Coast Seafood Processors Association (WCSPA). WCSPA represents shore-based seafood processors in Washington, Oregon and California. WCSPA members process a major portion of the sardine landed on the west coast.

WCSPA strongly urges the Council to move forward with the FMP amendment to develop a long-term sardine allocation framework. It is critical that this amendment process begin as soon as possible in order to have a process in place for the 2006 sardine season. As you know the interim agreement expires following the 2005 season. The harvest guideline continues to be underutilized on an annual basis so consideration of a long-term allocation amendment is appropriate to replace the existing interim allocation.

The timing of the NMFS request of May 18th requesting a host of additional issues to be addressed through the FMP process is troubling. While the additional issues outlined in Dr. McInnis's letter are important, they should not impede resolving the crucial allocation issues plaguing the fishery. The obvious importance is to address the allocation issue without delay. WCSPA suggests that the Council immediately take up the allocation issue through an FMP amendment and the longer-term issues be addressed through a subsequent FMP amendment. Planning for multiple FMP amendments is not precedent setting and with commitments from the agencies as well as the CPSMT and CPSAS to work on these issues there is sufficient flexibility to proceed in this manner.

Thank you for your consideration.

Sincerely,

Heather Munro Mann
Munro Consulting, Inc for WCSPA