

**Ocean Gold  
Seafoods Inc.**

June 2, 2005

To: Pacific fishery management council members and staff  
From: Ocean Gold Seafoods.

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PFMC

RE: Re-allocation of sardine quota to a coast wide allocation

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Honorable members of the Pacific Fishery Management Council.

I would like to thank you for taking the time to read this letter and giving us the opportunity to present our case for reallocation alternative 3 providing a coastwise, seasonal allocation for the sardine harvest

Alternative 3 is the most fair, most flexible, and logically appropriate option for the next five years of sardine management. It is the only alternative that allows those capable and willing to harvest and process sardines equal opportunity to do so. It prevents a regional sub area lock out of available quota. Alternative 3 allows fisherman and the processing industry the opportunity to catch and process sardines, and market forces the opportunity to maximize the value of the catch.

Of the 673.625 metric tons of sardine available to be caught between January 1, 2000 and December 31, 2004, only 422,713 metric tons were caught, or 63% of the cumulative harvest guideline. Over 250,000 metric tons or 551 million pounds were left unharvested. A geographic allocation will perpetuate this pattern and prevent all sectors of the industry from having the opportunity to harvest the OY.

We unconditionally support Alternative 3 along with the vast majority of the industry participants in the Pacific Northwest and would appreciate your help and support in implementing this alternative to the current management policy.

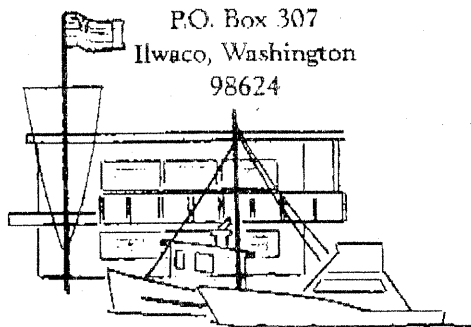
If you would like additional comment I can be reached in my office at 360-268-2510 or on my cell phone at 360-310-0664. Again I would like to thank you for the opportunity to present our case for alternative 3

Sincerely

Richard Carroll  
Intergovernmental affairs and business development  
Ocean Gold Seafoods

Commissioners  
FRANK UNFRED  
DICK WATROUS  
DICK SIEFERT

# PORT OF ILWACO



Mack Funk  
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www.portofilwaco.com

June 6, 2005

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PFMC

Mr. Mike Burner  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220

Dear Mr. Burner,

The Port of Ilwaco is vitally interested in the future of the sardine industry. It provides dozens of jobs here at our port and the possibility of additional freezer plant investment.

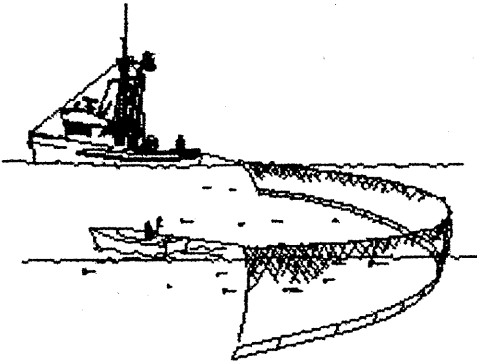
We strongly favor Alternative #3 (Coastwide Allocation in Three Periods) as proposed by the Pacific Fishery Management Council. We believe that this option is fair to the industry along the entire Pacific Coast.

Thank you for the opportunity to comment.

Sincerely,

*Mack Funk*  
Mack Funk

Cc: Rep. Baird  
Rep. Wu  
Sen. Murray  
Sen. Cantwell  
Pierre Marchand, Jessie's Ilwaco Fish Co.



## CALIFORNIA WETFISH PRODUCERS ASSOCIATION

Representing California's Historic Fishery

*Dianne Pleschner-Steel*

TO: Members of the Pacific Fishery Management Council  
FROM: CWPA on behalf of a majority of California's wetfish industry  
DATE: June 7, 2005  
SUBJECT: "Long-term" sardine allocation

Dear Council members,

We very much appreciate the hard work of Dr. Sam Herrick and the CPS Management Team in their yeoman effort to analyze the various alternatives presented for your consideration in Amendment 11. We also appreciate the Council's due diligence in attempting to find some guiding truth in the voluminous and confusing analysis presented to you.

**The truth is – and I believe everyone can agree on these points:**

**There is virtually no way to predict the behavior of the sardine resource over the next five years.**

**Likewise, there's no way to predict future market activity.**

**So, no matter how you try to meet the goal to achieve full use of the Optimum Yield, there is no guarantee that the fish will be there, or the markets either, over time.**

We urge the Council to adopt a precautionary, stepwise approach to "long term" allocation, in light of the uncertainties acknowledged by both the CPS Management Team and SSC about sardine biomass estimates.

**The 2005 SAFE document reports:**

- Sardine biomass has .. **leveled off** at approx. 1 million mt in recent years.
- Estimated recruitment **declined markedly** from 2004.
- ...per capita recruitment estimates show a **downward trend** in recruits per spawner in recent years, which may be indicative of a stock that has **reached a threshold** under current environmental conditions.
- **"Finally, should OR and WA landings continue to increase at rates comparable to those observed over the past few years and/or Mexico landings continue to increase...the implied population-wide Harvest Guideline will be exceeded again in 2005, as has been the case since 2002."**

We ask you to acknowledge the warning bells that Mother Nature is sounding, including the 2005 CalCOFI spring cruise results, which show diminished sardine egg production in California coupled with record anchovy egg counts. These signals, coupled with declining productivity apparent in recent years, portend a decline in the harvest guideline in the near future.

**Fostering further expansion at this time risks both overcapitalization of the industry and overfishing of the resource.**

The purpose of the "open access" fishery in the north was to utilize the expanded sardine resource when fish were abundant. But the biomass has plateaued. California wetfish fishermen and processors are simply asking the Council to consider the importance of the sardine resource to California's historic wetfish industry.

As we and other industry members have testified, sardines are an important component of a fishery complex that also includes mackerel and squid. **If your action results in premature closure of California's sardine fishery, the domino action will also cause economic harm to those fisheries as well, precipitating ruinous socio-economic consequences for fishing communities in Monterey as well as southern California.**

In truth, sardines are the backbone of our wetfish industry, essential to keep vessels afloat and market doors open.

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We continue to request the two items acknowledged as necessary in the Regulatory Amendment and Final Rule for interim allocation to inform discussion of "long term" allocation issues: expanded research and analysis of capacity. Neither study is yet available.

- Mounting a series of synoptic coast-wide cruises will answer critical questions about the resource:
  - one stock or more?
  - extent of spawning area?
  - relationship of the northern stock to the biomass as a whole?

This information is essential to engage in meaningful discussion on "long term" allocation. In the 2003 Environmental Assessment, the CPS Management team suggested that "biological-based implications of different allocation schemes be further evaluated...to provide management some guidance..." This important puzzle piece is still missing. **Confirmation of two stocks could lead to a vastly different set of allocation scenarios than we're now forced to contemplate.**

- Analysis of fishing capacity is the first step in "normalizing" the fishery. How much capacity can this fishery support over the long term? This information is essential to avoid overcapitalization – one of the primary goals of California's limited entry program implemented in the CPS FMP.

Currently California fishermen are restricted by capacity limits on their vessels and trip limits on their catch. Moreover, they are prohibited from fishing in the "open access" fishery north of Pt. Arena and landing the catch in northern ports UNLESS they also have state limited entry permits. Yet capacity is growing in the PNW fishery at a rapid rate; some fishermen are importing vessels with 100-ton capacity to ramp up the harvest. Many northern permittees do not have purse seine boats but can lease their permits with no capacity restrictions. At present there are no limits on either total capacity or daily catch in the Pacific Northwest.

The current state-implemented limited entry permit systems in the Pacific Northwest are inconsistent with the federal system. **Analysis of capacity and adoption of the permit standards now in place in California would address this current inequity. A majority of CA fishermen support a coast-wide limited-entry system, operated under one set of rules.**

In light of all the unknowns, and while expanded research and capacity analysis are underway, we recommend adoption of another "interim" allocation plan:

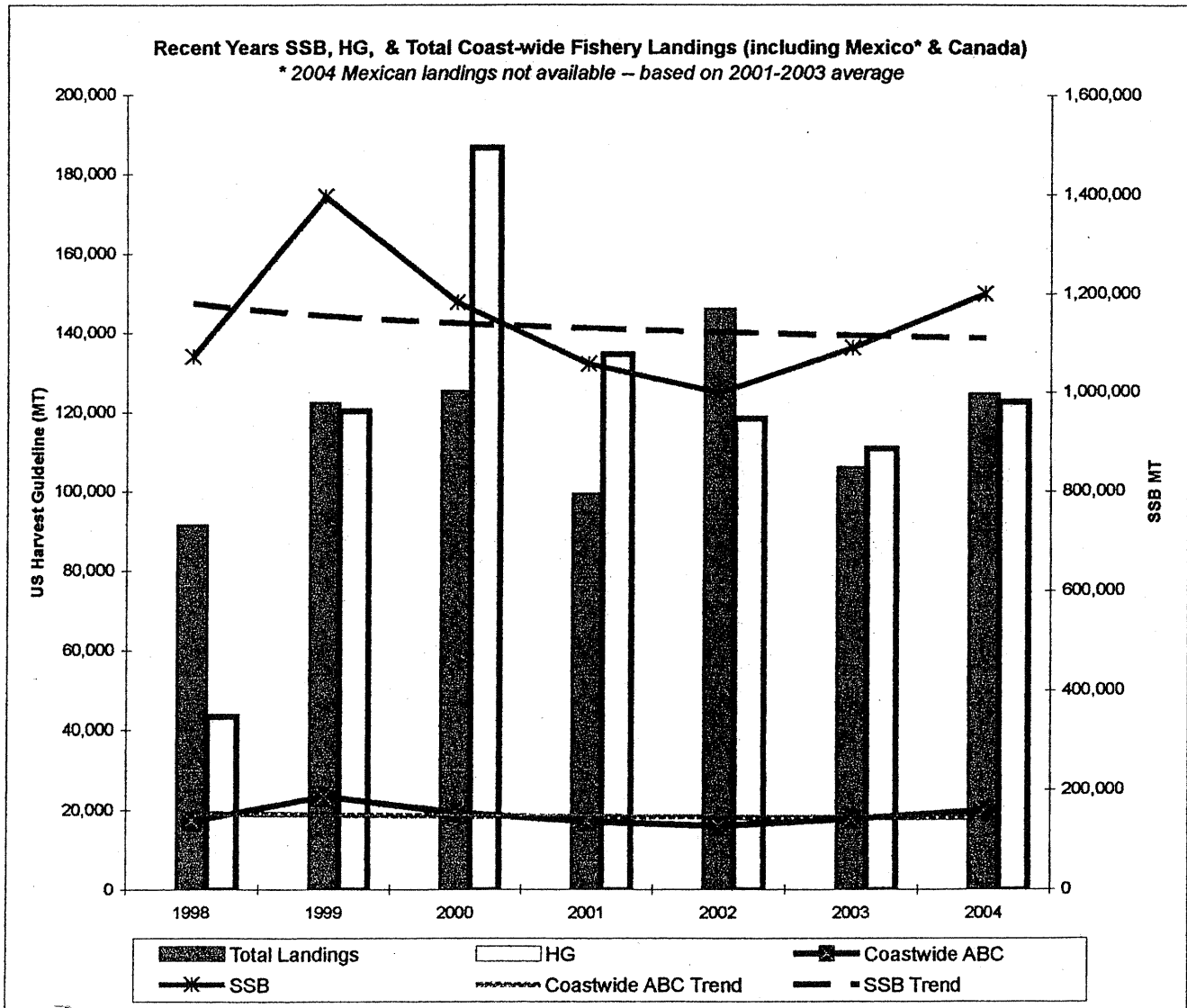
A majority of California wetfish fishermen and processors in both Monterey and southern California have testified in support of Alternative 7, initially proposed by Washington Council member Phil Anderson.

**Pacific Sardine Landings (MT)  
1998 through 2004 with estimated Spawning Stock Biomass (SSB)**

**PACIFIC SARDINE FISHERY IN RECENT YEARS - 1998-2005**

Sources: CDFG, PPMC, (PPMC 2004b) Table 14 - 2005 Sardine Stock Assessment

Season (Calendar Yr)	SSB MT	U.S. HG (mt)	COAST ABC (mt)	BC	WA (mt)	OR (mt)	CA (mt)	Total US	Ensenada*	Total (MT)
1998	1,073,000	43,545		745	0	0	42,956	42,956	47,812	91,513
1999	1,395,273	120,474	138,450	1,250	0	855	61,643	62,498	58,569	122,317
2000	1,182,000	186,791	186,791	1,718	4,791	9,528	58,203	72,522	51,173	125,413
2001	1,057,000	134,737	154,800	1,600	10,837	12,780	51,957	75,574	22,246	99,420
2002	999,000	118,442	136,050	1,044	15,212	22,713	63,712	101,637	43,436	146,117
2003	1,090,000	110,908	127,350	954	11,604	25,258	37,717	74,579	30,537	106,070
2004	1,200,000	122,747	141,000		8,799	36,111	47,702	92,612	32,073	124,685
2005		136,179	157,500							



Pacific Sardine Landings (MT)  
1998 through 2004 with estimated Spawning Stock Biomass (SSB)

Season	SSB (k mt)	BC	%	WA	%	OR	%	CA	%	Baja	%	Total (MT)
1916-17		0	0.0%	0	0.0%	0	0.0%	24,975	100%	0	0	24,975
1917-18		73	0.1%	0	0.0%	0	0.0%	65,917	99.9%	0	0	65,917
1918-19		3,302	4.6%	0	0.0%	0	0.0%	68,529	95%	0	0	71,832
1919-20		2,976	4.7%	0	0.0%	0	0.0%	60,809	95%	0	0	63,785
1920-21	5,055	3,992	10.3%	0	0.0%	0	0.0%	34,882	90%	0	0	38,873
1921-22		898	2.6%	0	0.0%	0	0.0%	33,113	97%	0	0	34,011
1922-23		925	1.5%	0	0.0%	0	0.0%	59,067	98%	0	0	59,993
1923-24		880	1.1%	0	0.0%	0	0.0%	76,141	99%	0	0	77,021
1924-25		1,243	0.8%	0	0.0%	0	0.0%	156,963	99%	0	0	158,206
1925-26	6,226	14,470	10.4%	0	0.0%	0	0.0%	124,531	90%	0	0	139,000
1926-27		43,999	24.2%	0	0.0%	0	0.0%	138,084	76%	0	0	182,083
1927-28		62,079	26.8%	0	0.0%	0	0.0%	169,881	73%	0	0	231,960
1928-29		73,038	24.0%	0	0.0%	0	0.0%	230,863	76%	0	0	303,901
1929-30		78,327	21.0%	0	0.0%	0	0.0%	294,992	79%	0	0	373,319
1930-31	5,300	68,103	28.9%	0	0.0%	0	0.0%	167,940	71%	0	0	236,043
1931-32		66,770	30.9%	0	0.0%	0	0.0%	149,365	69%	0	0	216,134
1932-33	3,523	40,234	15.0%	0	0.0%	0	0.0%	227,424	85%	0	0	267,659
1933-34	3,414	3,674	1.0%	0	0.0%	0	0.0%	347,845	99%	0	0	351,519
1934-35	3,623	39,009	6.7%	0	0.0%	0	0.0%	539,829	93%	0	0	578,839
1935-36	2,844	41,114	7.2%	9	0.0%	23,796	4.1%	508,480	89%	0	0	573,399
1936-37	1,688	40,325	5.6%	5,951	0.8%	12,882	1.8%	658,735	92%	0	0	717,893
1937-38	1,206	43,618	9.6%	15,513	3.4%	15,114	3.3%	377,904	84%	0	0	452,149
1938-39	1,201	46,965	7.7%	24,023	3.9%	15,440	2.5%	521,897	86%	0	0	608,325
1939-40	1,607	5,008	0.9%	16,112	3.0%	20,258	3.8%	487,405	92%	0	0	528,782
1940-41	1,760	26,100	5.8%	735	0.2%	2,867	0.6%	417,839	93%	0	0	447,541
1941-42	2,457	54,477	8.8%	15,513	2.5%	14,379	2.3%	532,861	86%	0	0	617,230
1942-43	2,064	59,766	11.5%	526	0.1%	1,769	0.3%	457,825	88%	0	0	519,887
1943-44	1,677	80,504	15.3%	9,471	1.8%	1,651	0.3%	433,756	83%	0	0	525,382
1944-45	1,206	53,633	9.6%	18	0.0%	0	0.0%	503,407	90%	0	0	557,058
1945-46	720	31,117	7.8%	2,096	0.5%	82	0.0%	346,219	92%	0	0	399,513
1946-47	566	3,620	1.6%	5,570	2.5%	3,593	1.6%	212,104	94%	0	0	224,886
1947-48	405	445	0.4%	1,234	1.0%	6,287	5.3%	110,080	93%	0	0	118,045
1948-49	740	0	0.0%	45	0.0%	4,826	2.8%	166,675	97%	0	0	171,547
1949-50	793	0	0.0%	0	0.0%	0	0.0%	307,471	100%	0	0	307,471
1950-51	780	0	0.0%	0	0.0%	0	0.0%	320,319	100%	0	0	320,319
1951-52	277	0	0.0%	0	0.0%	0	0.0%	117,122	89%	14,682	11.1%	131,804
1952-53	136	0	0.0%	0	0.0%	0	0.0%	5,181	38%	8,312	61.6%	13,493
1953-54	202	0	0.0%	0	0.0%	0	0.0%	4,075	24%	12,978	76.1%	17,053
1954-55	239	0	0.0%	0	0.0%	0	0.0%	62,111	85%	11,285	15.4%	73,397
1955-56	170	0	0.0%	0	0.0%	0	0.0%	67,551	95%	3,817	5.3%	71,367
1956-57	108	0	0.0%	0	0.0%	0	0.0%	30,521	71%	12,388	28.9%	42,908
1957-58	90	0	0.0%	0	0.0%	0	0.0%	20,205	69%	9,003	30.8%	29,208
1958-59	177	0	0.0%	0	0.0%	0	0.0%	94,322	82%	20,261	17.7%	114,583
1959-60	122	0	0.0%	0	0.0%	0	0.0%	33,798	63%	19,456	36.5%	53,254
1960-61	88	0	0.0%	0	0.0%	0	0.0%	26,198	59%	18,052	40.8%	44,250
1961-62	54	0	0.0%	0	0.0%	0	0.0%	23,159	55%	19,296	45.5%	42,455
1962-63	27	0	0.0%	0	0.0%	0	0.0%	3,785	22%	13,263	77.8%	17,047
1963-64	21	0	0.0%	0	0.0%	0	0.0%	2,669	14%	16,678	86.2%	19,347
1964-65	11	0	0.0%	0	0.0%	0	0.0%	5,537	18%	24,603	81.6%	30,140
1965-66	3	0	0.0%	0	0.0%	0	0.0%	652	3%	20,182	96.9%	20,833
1966-67	n/a	0	0.0%	0	0.0%	0	0.0%	312	2%	17,718	98.3%	18,030
1967-68	n/a	0	0.0%	0	0.0%	0	0.0%	64	0%	25,090	99.7%	25,155

