



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

Representing California's Historic Fishery

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May 21, 2008

Mr. Don Hansen, Chair &
Dr. Don McIsaac, Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place #200
Portland OR 97220-1384

RE: Agenda Item C.1.c : Future Workload Planning

Dear Chairman Hansen, Dr. McIsaac and Council members,

The California Wetfish Producers Association (CWPA) represents the majority of sardine processors and active wetfish fishermen from both Monterey and southern California. We very much appreciate this opportunity to address the Council on issues of importance to this historic wetfish industry.

In our October 13, 2007 comments we recommended, in part:

[3] We request that the Council schedule a formal review of the current seasonal, coastwide 'long term' allocation formula in the fall of 2008, as indicated in the final rule for Amendment 11. The coming year should provide a serious reality-check (assuming fishing conditions are similar to 2007), testing the operation of this system in a year when a reduced harvest guideline constrains catches, most likely resulting in a derby fishery, a race for fish.

CWPA members maintain an active interest in this formal review; however, after engaging in discussion with members of the CPS management team and advisory subpanel, we concur with the statements of both advisory bodies, recommending that this review be postponed until after the industry has experienced a full year of operation and directed fishery closures under the reduced harvest guideline.

As noted in the CPSAS report, the directed fishery in California attained the first seasonal allocation of 26,550 mt on May 15, 2008. Directed sardine fishing did not occur in the Pacific Northwest in the first seasonal period, apparently due to the presence of cold water 9-10 degrees C. In California, fishing slowed down in early April until a huge body of sardines reappeared; the Monterey fleet harvested 90-120 gram fish, full of eggs, unusual for this time of year. Sardines are still plentiful in both Monterey and southern CA, but the directed sardine fishery can not resume until July 1; the fleet is looking for other CPS to harvest in the meantime.

The July 1 – September 15 release of 34,568 mt plus any incidental carried over from the first period will be harvested quickly, we believe, with all three areas fishing simultaneously. It is likely that directed fishery closures will occur in every seasonal release period this year.

For these reasons we support the recommendations of the CPSMT and CPSAS that a more appropriate time for a full review of the Amendment 11 allocation framework is the June 2009 meeting, when complete information on the 2008 performance of all fishery sectors will be available, as well as updated biological information on the status of the resource.

Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, reading "Diane Pleschner-Steele". The signature is written in a cursive, flowing style.

Diane Pleschner-Steele
Executive Director