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.2.c.: Experimental Fishing Permit (EFP) for Sardine Research (including CA)

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 the subject of Pacific sardine research.

As we testified in November 2008, we believe developing a second index of sardine abundance is essential to achieve effective sardine management, and we support the aerial survey methodology developed by the Pacific Northwest sardine industry. CWPA and CA members of the CPS Advisory Subpanel also supported increasing the research set aside from 600 mt to 1,200 mt to enable the CA wetfish industry to participate in a synoptic [or near synoptic] aerial survey in the summer of 2009, when CA sardines are present and visible at the surface during daylight hours. Extending the survey into California this year is important to improve understanding of the extent of the resource and coast-wide migration patterns. We request a portion of the research set aside to conduct this survey in California this year. CA use of the set aside will be taken under the guidance of CA scientists, in coordination with PNW scientists, with the goal to achieve representative samples for school size, density and volume in both regions that can be integrated to improve knowledge of the sardine resource.

Based on early communications with PNW industry, we had planned to participate in a joint EFP and aerial survey this summer, with CWPA’s contracted scientist coordinating the CA portion in cooperation with PNW scientists. However, our recent efforts to integrate the CA survey elements into the draft EFP developed by PNW coordinators were rejected by PNW industry, revised and replaced with caveats and preconditions to ‘prove up’ that may be virtually impossible to meet within the short opening expected for the summer directed sardine fishery. Absent this arbitrary ‘approval’ prior to the conclusion of directed fishing, CA would be denied access to a portion of the research allocation, according to the ‘final’ modified PNW EFP proposal that we received late afternoon on Tuesday, February 17. We view this late-blooming lack of cooperation from PNW industry with dismay, particularly in light of enthusiastic communications among PNW and CA scientists.
Of necessity, we are submitting a parallel EFP, outlining the CA portion of the survey, and omitting the preconditions.

The parallel EFP submitted by CWPA follows the basic methodology developed by the PNW in 2008, and in fact adopts most of the original text re: methods and analysis. It simply fleshes out the CA portion of the survey, and requests that CA be allowed to use ‘up to 600 mt’ of the research set aside, with the understanding that CA use of the set aside will be taken under the guidance of CA scientists, in coordination with PNW scientists, with the goal to achieve representative samples for school size, density and volume in both regions.

CWPA’s contracted scientist and PNW scientists have agreed to cooperate to facilitate a science-based survey in 2009, to occur synoptically in both PNW and California/Monterey. SWFSC acoustic experts also have expressed interest in working cooperatively with the research team to improve hydroacoustic measurement of sardine schools in the context of this aerial survey.

We appreciate the Council’s interest in this research and urge the Council to approve the EFP, and to allow CA to participate in this research project outside the summer directed fishing period.

Thank you for your consideration.
Best regards,

Diane Pleschner-Steele
Executive Director