PFMC
March 21, 2015

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Chair Lowman and Pacific Fishery Management Council Members

I am concerned about the significant number of California sea lion pups washing up on California beaches dead and dying. Seventy percent of sea lion pups are expected to die this year before weaning age. Sea lions are suffering due to a lack of high quality forage fish – sardine and anchovy. We request you fix the sardine harvest framework so that when determining the amount of sardines that can be sustainably caught, enough of these forage species are left in the ocean to provide for dependent predators like sea lions.

The draft 2015 Pacific sardine assessment shows the population has declined 90 percent since 2007, with no signs of recovery. Alarmingly, the sardine population is now at one percent of its historic peak population size in the late 1930’s – prior to heavy exploitation that resulted in the subsequent collapse of the sardine population, which persisted for decades. Since 2007, the directed commercial fishery has removed 1.6 billion pounds of sardines from the ocean, taking many of the older fish that have the highest reproductive potential.

The impact of the directed fishery on the sardine population must be seriously addressed. You cannot ignore the effects of fishing on this important forage fish and the impact this is having on other marine animals that rely on this important fish as a critical part of their diet.

As the sardine population has plummeted, I am also concerned about increases in Northern anchovy fishing. Current information suggests the anchovy population is very low and that fishing for these small fish is increasing. California brown pelicans, which depend on northern anchovy, are abandoning their nests because they cannot find enough food to sustain their nesting period and feed their chicks. Without a scientific assessment showing that the Northern anchovy population is increasing off California, increasing fishing effort puts the anchovy population and the predators that depend on it at great risk. The last thing we need is for anchovy to be overfished before the population has a chance to recover.
Please halt fishing on Pacific sardine immediately and fix the fundamental Pacific sardine management framework to better account for the needs of the ecosystem. Fishing needs to stop sooner during a collapse so that the collapse is not as severe and long lasting. Similarly, I ask that you fix the management framework for Northern anchovy and prioritize a population assessment for this important species. Addressing anchovy and sardine management is necessary to ensure adequate prey is maintained for dependent predators, like sea lions, California brown pelicans, Chinook salmon and the many others that depend on abundant forage fish.

Sincerely yours,

[Signature]

Martin Steitz