



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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May 11, 2015

Ms. Dorothy Lowman, Chair
And Members of the Pacific Fishery Management Council
7700 NE Ambassador Place #200
Portland OR 97220-1384

RE: Agenda Item G.2 Pacific Mackerel Assessment & Management Measures

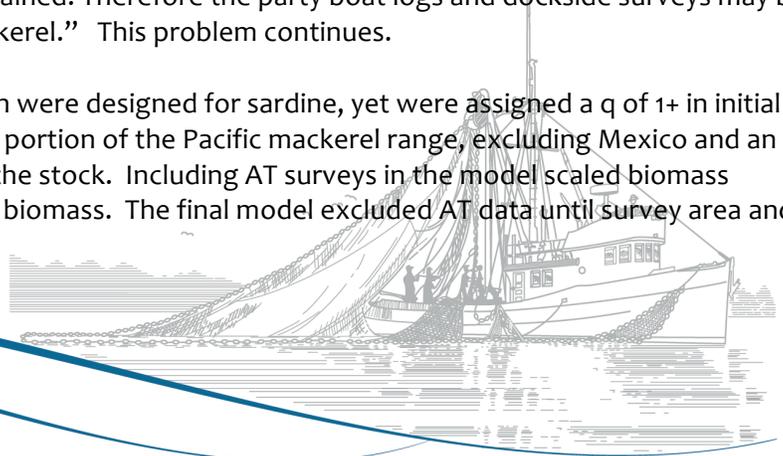
Dear Ms. Lowman and Council members,

I'm writing as Executive Director of the California Wetfish Producers Association (CWPA), representing the majority of coastal pelagic species 'wetfish' fishermen and processors in California. I also served as the CPSAS representative on the Pacific mackerel STAR panel. I appreciate your consideration of the concerns that I highlighted in Appendix 2 of the STAR panel report.

Before outlining our concerns, I'd again like to thank the STAT for their hard work, and to reiterate that I, on behalf of California's wetfish industry, totally share the frustration of both the STAT and STAR panel regarding the uncertainties inherent in this Pacific mackerel stock assessment.

As I noted in Appendix 2 of the STAR panel report, one problem is that the model and data are not consistent: the model is attempting to estimate the entire Pacific mackerel biomass but the two independent indices of abundance initially considered in the model measure only a part of it. For example, CPFV surveys record only incidental mackerel landings in California, yet mackerel landings are increasing in the Pacific Northwest, and to date biological composition data are unavailable to account for Pacific Northwest catches. Further, as stated in the 2011 STAR panel report, the CPSAS representative voiced concern with "... inconsistent reporting of Pacific mackerel encounters [in CPFV logs], whether the fish are caught and retained for consumption or for bait, or caught and released. Recreational anglers surveyed also reported that dockside surveys did not always ask about Pacific mackerel that were used for bait or retained. Therefore the party boat logs and dockside surveys may be underreporting the occurrence of Pacific mackerel." This problem continues.

In addition, Acoustic Trawl (AT) surveys, which were designed for sardine, yet were assigned a q of 1+ in initial model runs for Pacific mackerel, survey only a portion of the Pacific mackerel range, excluding Mexico and an unquantified but likely substantial portion of the stock. Including AT surveys in the model scaled biomass downward, but provided little information on biomass. The final model excluded AT data until survey area and methodology can be improved.



Perhaps the most frustrating aspect of this assessment is that, based on 2014 survey data, the model predicts a further decline in biomass, based on, according to the assessment report:

“current low abundance as indicated in the AT survey time series, unrealized quotas by the U.S. fishery, and limited catches reported in Mexico;...”

The problem is, the AT survey didn't “see” a significant proportion of the biomass, and the US fishery didn't catch the quota because the CA wetfish fleet was focusing on squid — although catches DID more than double in the PNW, and mackerel were increasingly observed both there and in California. Further, the assumption that biomass declined because Mexico wasn't landing mackerel does not consider the northward shift of the resource (for spawning sardines as well) due to the warm-water El Niño influence. Plus, the only index remaining in the model was the party boat logs, where catches also declined, but party boats are not reporting all the Pacific mackerel caught.

In reality, although based on “best available” science, the model had insufficient data to predict biomass and the fishery is likely to be penalized this year by further shrinking the quota. And this comes at a time when Pacific mackerel are increasing on the fishing grounds (even though catches haven't showed it yet). This year virtually everyone will be targeting mackerel because it's the only game in town, given the known El Niño impact on squid and closure of the sardine fishery.

The Council needs maximum flexibility to adjust the biomass estimate mid-management cycle, and at very least the Council and SSC should agree with the STAT's recommendation:

“Finally, we feel future reviews for addressing a new and improved assessment model for Pacific mackerel would benefit from a two-phase meeting approach: 1) the first meeting should be held with members of the CPS-subcommittee of the SSC before the next formally scheduled STAR to critique/discuss a revised model based on the goals noted above, e.g., 1-day meeting held in concert with a previously scheduled SSC meeting—potentially, summer/fall 2016; and 2) a second, more typical STAR meeting would then be conducted that fully meets the CPS terms of reference for purposes of providing management advice for the coming fishing year(s). Although the current assessment schedule for this species stipulates that the next review meeting should take place in spring 2017 (catch-based projection only), we feel that the best deliverable would entail using the summer/fall 2016 meeting with the CPS subcommittee for guidance concerning the type of assessment that should go forward for review in spring of 2017, e.g., update or full assessment, rather than a simple catch-based projection.”

In summary, our recommendations include the following:

- Data collection programs need to be substantially expanded:
 - Recreational catch data collection programs should emphasize the need to report all incidental Pacific mackerel catches, whether retained, returned or used for bait.
 - Biological (age, size, weight, length) composition data in the Pacific Northwest should be collected and included in future models.
- AT survey methodology should be modified to increase the spatial boundaries of the survey grid, ideally into Mexico either independently or cooperatively, as well as to add side-looking sonar acoustics to capture fish in the upper water column (a hope that may be resolved at least in part with the deployment of the Ruben Lasker in future CPS surveys).
 - Sample size in AT surveys also should be substantially increased.
- Efforts should be continued to encourage collaborative Tri-national research and data exchanges, and to collaborate with the fishing industry toward improving the knowledge of Pacific mackerel.

Similar concerns are also expressed in some form in the Research and Data Needs section of the Pacific Mackerel Stock Assessment Report.

The one overarching recommendation that we believe is critical, in light of the dynamics of the Pacific Mackerel fishery, is to allow the Council flexibility to adjust management measures as needed between scheduled stock assessment reviews. . Pacific mackerel are acknowledged to have rapid 'spikes' in abundance in favorable conditions. On behalf of California's wetfish fleet I again express concern with the apparent dichotomy between scientific survey data and recent observations on the grounds.

We understand the purpose of the STAR panel is to attempt to find a risk-neutral, best estimate of biomass, and consideration of management is outside the terms of reference. However, it is important to reiterate that with the closure of the sardine fishery, and the probable decline in squid abundance due to the current El Nino cycle, effort will increase on Pacific mackerel in 2015, both in California and the Pacific Northwest. Flexibility to adjust the Pacific mackerel harvest guideline upward if survey(s) or catches in intermediate years warrant, perhaps as an "emergency" action, would enable the fleet and markets to continue operating in the absence of other CPS.

As I've noted many times in the past, as recently as the April meeting, from historic times to the present, California's wetfish industry has relied on a complex of coastal pelagic species including mackerels... **This industry has produced on average 80 percent of total fishery landings statewide, and close to 40 percent of dockside value.** Maintaining a reasonable Pacific mackerel quota will be essential to keep the wetfish fleet working and processors' doors open this year.

Thank you for your consideration.

Best regards,



Diane Pleschner-Steele
Executive Director