February 9, 2011

Mr. Mark Cedergreen, 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 Exempted Fishing Permits (EFP) for 2011

The California Wetfish Producers Association (CWPA) represents the majority of active wetfish fishermen and processors in California. We appreciate this opportunity to present our recommendations for Experimental Fishing Permits for 2011.

We again thank the Council for your continued support of the industry-sponsored aerial survey, which has had a substantial impact on sardine stock assessments in 2009 and 2010. As you’re aware, California dedicated substantial funding and energy to participate in a synoptic summer survey in both years. The persistent summer fog that plagued our efforts, which is predicted to increase in the future, coupled with the requirement to finalize data collection and analysis by early September, precipitated our decision to refocus our research efforts.

Although we are not participating directly in the summer survey in 2011, we are loaning our camera system to the NWSS to facilitate the survey in the Pacific Northwest. CWPA fully supported the CPSAS recommendation to allocate 2,100 mt from the EFP set aside to accomplish the summer survey in the Pacific Northwest. The CPSAS also recommended allocating an additional 2,100 mt to expand a fall survey in CA, based on the results of our 2010 fall pilot project, conditional on an EFP application and peer review of the methodology at a STAR panel in May. The goals of the fall pilot were to evaluate LIDAR in combination with aerial photography, compared with acoustics, day versus night, to identify the most effective way to measure sardine abundance.

This study suffered setbacks beginning with the untimely death of a leader of California’s wetfish fleet at the start of the project, to LIDAR malfunction and weather problems that persisted until the end, when we ran out of time. Project principals have spent long hours and days analyzing the thousands of photographs and LIDAR readings in the past month, and today Dr. Doyle Hanan emailed the consensus of the research group to Dr. Nancy Lo, coordinator of the May STAR panel review:

After serious consideration and discussion ... we have decided to forgo the STAR panel review of our fall sardine project this year. Although we are pleased with much of what we accomplished, difficulties in some areas lead us to the conclusion that we aren’t quite ready for the intense and detailed STAR panel review in May.
We would rather take at least another year to gather more data and further investigate all features of the project, building on those that worked well, while revising those where we had difficulties. Thank you for your work to organize the review.

Sincerely, Doyle

Members of CWPA are disappointed that again Mother Nature appears to have confounded what was admittedly an ambitious undertaking that would have required near-perfect weather conditions and coordination to accomplish. We appreciate the significant efforts of our research team, and concur with their decision. Dr. Hanan will lead in drafting the final report, which will be submitted to the Council as soon as possible.

We look forward to further discussion and participation in the sardine methods workshop planned for later this spring, with the possibility of developing a collaborative research project in 2012. Preliminary results of our fall pilot indicate that use of LIDAR in conjunction with the aerial camera extends the capability and effectiveness of both survey methods, as LIDAR was shown to ‘see’ fish that are invisible to the camera, and also is effective to measure school density and its position in the water column.

For this year, because we will not be submitting an EFP application nor participating in a STAR panel review, we had initially recommended that the 2,100 mt EFP fish that the CPSAS had recommended for a fall survey in CA be returned to the fall directed fishery allocation. However, our letter did not make it into the Council briefing books.

On February 17, I learned that NWSS planned to increase the number of transects in the summer survey from 26 to 41 and asked CA to support allocating an additional 600 mt from the unused EFP set aside. I reported the request at the CWPA annual meeting on February 18, and a consensus of members at the meeting supported it. CWPA therefore supports allocating an additional 600 mt from the EFP set aside to NWSS, and recommends that the remaining 1,500 mt be returned to the fall directed fishery allocation, which would increase the fall directed fishery HG to 10,082 mt.

We appreciate the Council’s consideration of these comments and recommendations.

Best regards,

Diane Pleschner-Steele
Executive Director