

Ryan D. Kapp
955 Colony Ct. Bellingham, WA 98229
(360)714-0882 (360)961-6722 kappjr@comcast.net

March 20, 2013

Pacific Fishery Management Council
Dan Wolford, Chair
Dr. Don McIsaac, Executive Director
7700 NE Ambassador Place, Suite 101
Portland, OR 97220-1384

Dear Chair Wolford and Council Members,

I have fished for sardines out of Astoria since the fishery started there in 1999 and have been a participant in the Council process for over a decade. I appreciate the chance to comment on possible changes to the sardine HCR.

I attended the workshop in La Jolla the first week of February. I asked the following question at the meeting: If we are trying to refine the existing HG formula into something that ensures the long term sustainability of the sardine stock.... is the stock actually sustainable in the long term? In other words: Are we trying to save something that can be saved and will adjusting the HCR accomplish this goal? My question was never answered. It was clear the Workshop was to look for changes to improve the HCR. My concern is what effect, if any, the HCR changes will have toward reducing or reversing what many believe is a downward trend in the sardine stock.

Stock assessment is the key driver of the HCR because the biomass, not the harvest fraction, has the largest effect on what is to be harvested. Modifying the fraction or stock distribution within the HCR accomplishes next to nothing if the assessment is not accurate. This is where I, along with many others in the fishery, feel the time, money, and emphasis should be placed. This fishery has had a 15% harvest fraction since I started fishing sardine in 1999 and the biomass levels have increased or decreased annually by as much as 40-50%. Obviously something other than fishing is contributing to these swings. Overfishing is still the easiest and most convenient explanation for the sardine crash of the 1950's so it would seem reducing harvest levels would be the only way to prevent another decline. Can a decline really be averted? It is also known, unfortunately by far less than those who blame overfishing, that environmental conditions contributed greatly to the decline as well. A study from 1992 shows 9 major declines and rebuilds of the stock in the past 1700 years before fishing was even taking place meaning populations of sardine go up and down quite dramatically whether fishermen are catching them or not. Fishing, no doubt, exacerbates the decline but fishing is not the lone culprit. Today's harvest rates are far less than they were in the days of Cannery Row.

I understand the Council is under pressure from various groups to have a full MSE for the CPS FMP. Hopefully, this will not take time and effort away from other important items and research needs in the sardine fishery. Again, the most important component of the HCR is the biomass assessment and there is still debate over those results and always more work and refinement to be done. Methodology reviews are needed for both the aerial and acoustic surveys and a subsequent STAR panel for the assessment model is needed as well. Whatever decision is made I encourage the Council to ensure adequate time for input and study before any changes are made to the HCR and that making these changes will not overburden the NMFS staff already tasked with producing the stock assessment.

Thank you for considering my comments on this matter.

Regards,

Ryan Kapp