



## STATE FISH COMPANY, INC.

October 8, 2002

Dr. DONALD McISAAC  
PACIFIC FISHERY MANAGEMENT COUNCIL  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384

Dear Dr. McISAAC,

During the early 1980's, California fishermen reported, "you can walk on the sardines". The California Department Of Fish and Game did not open the fishery, citing the need for mandatory research first.

To help the Department "see what the fishermen were seeing, the California wetfish industry contributed financially: supported spotter planes to expand biomass surveys, contracted for independent research (which led to the CANSAR stock assessment model), and paid -- and still pays -- disproportionately high fish tax of \$13 per ton -- which has generated more than \$2 million to the State in the past three years.

Enter Oregon and Washington --

No egg studies, virtually no understanding of the cyclical nature of the resource or the biological impact of rapidly expanding their take and processing capacity and crying for more.

Now the "Government", with the blessing of the California Dept of Fish and Game, implements an emergency reallocation for sardines in the north, after lobbying effort by Pacific Northwest interests disguised as "economic hardship" persuades the National Marine Fisheries Service to reverse its earlier denial of the emergency reallocation request. NMFS' initial denial was based in large part on not wanting to further expand the "new" fishery until research determines the relationship of the mature fish to the resource as a whole. Pleas of poverty notwithstanding, the fact is that Oregon and Washington had a banner sardine season -- their summer season preempted the fall fishery in Monterey. This rapid expansion in the absence of research jeopardizes the resource -- it comes at the expense of the traditional California fishery. In the historic sardine fishery California produced 97 percent of US sardine landings. Oregon and Washington accounted for 3 percent.

The quota is dropping again in 2003, and there will surely come a time when the harvest percentage drops from the current 15 percent to 5 percent of the biomass, and California will again not be able to fish, not only sardines but mackerel and squid as they are sometime mixed.

- **Especially in light of sardines "rehabilitated" status, how can the Department justify encouraging a fishery in Oregon and Washington without first conducting even elemental baseline research on the stocks?**
- **How is it that the protocol for fisheries management is not applied evenly for the same fishery but in different geographic areas ? Is economic hardship now a basis to open a fishery ?**



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Sardines are an historic and cultural resource as well as economically valuable both to the fishing industry and the State of California. Since before the turn of the 20<sup>th</sup> Century, the wetfish industry has been the foundation of California's fishing industry. Wetfish, including sardines, still represent more than 80 percent of total California commercial fishery landings. In 2000 wetfish fisheries represented nearly 30 percent by value of the total commercial catch. The emergency reallocation recently announced by NMFS, and supported by Department of Fish and Game, represents a potential loss to California sardine landing taxes.

I would like to discuss options that maintain access to sardine quota for California.  
Is there a time I may call you and discuss this?

Thank you.

Regards,  
Vanessa DeLuca  
State Fish Company, Inc.  
San Pedro, California

Dr. Donald McIsaac, Executive Director  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 200  
Portland, OR 97220-1384



Subject: Need For Additional Pacific Sardine Resource Research

Dear Dr McIsaac and Council Members:

LMR Fisheries Research, Inc. has been involved in fish and shellfish resource evaluations since 1969. One of our many primary research projects has been the Pacific sardine (*Sardinops sagax*) in the eastern Pacific coastal pelagic fisheries. It was LMR staff that developed, under contract, the sardine stock assessment model "CANSAR" in 1992. At that time only the southern stock was in the research. However, today there are believed to be two "stocks" or "subpopulations" of this species off the west coast. Now a more advanced "two-area" model is utilized for the annual assessments.

The purpose of this letter is to firmly suggest the current need for more extensive at-sea research into the two-stock theory--one in the north consisting mostly of large, mature fish and a southern population of mostly small individuals. First--are these "subpopulations" real, if so, are they separated because of the oceans climatic differences or because of biological variances? Can overfishing in either geographic region affect the other or are they tied together biologically and only separated by oceanic habitats?

The Pacific sardine resource has been one of the most robust fish populations in the eastern Pacific region recently and it would be disastrous to repeat the collapse of the resource as occurred in the decades of the 1950's and 1960's. Biologists need to know much more, especially about the northern "stock," to help manage this fishery for tomorrow.

By this letter I wish to encourage the Council to fully support the additional research required on the sardine "two-stock" theory or concept for management purposes to hopefully avoid a potential overfishing problem and to request the National Marine Fisheries Service to fund the research. This research should be carried as soon as possible--at least by next year.

Thank you for allowing LMR to present its views on this important fishery resource matter.

Sincerely,  
Charles Peckham  
President, LMR Fisheries Research, Inc.

CC: Dr. Bill Hogarth, NMFS  
Rod McInnis, NMFS SW Region  
Kevin Hill, Cal Dept. Fish and Game  
Senator Dianne Feinstein  
Cong. Duke Cunningham

