

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL COMMENTS ON  
DRAFT REGULATORY AMENDMENT AND ANALYSIS FOR CHANGES TO SARDINE ALLOCATION

The Coastal Pelagic Species Advisory Subpanel (CPSAS) heard a presentation from CPS Management Team (CPSMT) Chair Dr. Sam Herrick summarizing the analysis of sardine harvest guideline allocation options. The CPSAS supports the process and methods utilized by the CPSMT to provide a baseline for analysis of the various alternatives. The CPSAS unanimously supports the suite of four alternatives going out to the public for review and believes that the options represent a reasonable range of alternatives to consider. For completeness, a majority (eight of nine) of the CPSAS supports adding an additional alternative identified as alternative 3a<sub>ii</sub> from the original suite of alternatives, the minority (one of nine) believes this is redundant.

While status quo is an option the CPSAS supports going out for public review to complete the range of reasonable alternatives, it is important to note the CPSAS does not support status quo or no action for 2003. This is an unacceptable alternative that will result in severe economic hardship in Northern California, Oregon, and Washington.

The majority (seven of nine) of the CPSAS supports identifying Alternative 3 as the CPSAS's preferred option for the short-term. The CPSAS believes this option is the most suitable for addressing the problems realized in the 2002 fishery, including the premature closure of the Northern California and Oregon and Washington fisheries. This alternative also provides the best opportunity for total utilization of the optimum yield. The majority of the CPSAS believes this alternative will not negatively impact Southern California fisheries for the reason that the current scheme allocates a much larger amount of fish to the southern area than they have harvested in recent years. The CPSAS also believes this step allows us to proceed cautiously with an interim plan (one to two years) which more equitably distributes the available harvest, while longer term research efforts are completed.

A minority (two of nine) of the CPSAS preferred Alternative 4, moving the allocation date up to September 1, over Alternative 3, as a short-term mitigation to reduce economic impacts in the northern fishery while minimizing negative effects in the southern fishery. It was felt that changing the reallocation date is the simplest measure to achieve better utilization of optimum yield in the short term in light of uncertainties expressed. This minority opinion advocates research before further expansion beyond alternative 4.

The majority of the CPSAS (six yes, one no, one abstention), in their review of the economic data presented, believe data from the sample of southern area processors is not representative of the southern area fishery as a whole.

The CPSAS continues to unanimously support increased research on the stock and economics of the fishery as part of the process for determining a long-term allocation scheme for the West Coast sardine fishery.

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