

COASTAL PELAGIC SPECIES MANAGEMENT TEAM REPORT ON  
FISHERY MANAGEMENT PLAN AMENDMENT ISSUES—SARDINE ALLOCATION

The Coastal Pelagic Species Management Team (CPSMT) reviewed a letter to the Pacific Fishery Management Council (Council) from Mr. Rod McInnis, National Marine Fisheries Service (NMFS)-Southwest Region. The CPSMT reviewed the issues raised in the letter to provide information to the Council for a response to NMFS. The issues were evaluated in terms of their validity, time and resources necessary to complete the task, priority level relative to other coastal pelagic species (CPS) fishery management plan (FMP) workload, and potential schedule for when the issue could be addressed.

The CPSMT considers developing a long-term allocation formula for the Pacific sardine fishery to be the highest priority FMP-related issue. The CPSMT supports the Council's assignment of the development of alternative allocation formulae to the Coastal Pelagic Species Advisory Subpanel (CPSAS). Once a range of alternatives is developed, the CPSMT will analyze the alternatives to provide information for Council decision making; keeping in mind that, as stated previously, the CPSMT strongly advises that at the onset, the CPSAS must develop general consensus regarding the preferred allocation alternative.

In their May 18, 2004 letter, NMFS identified the following issues: harvest guideline formulae for Pacific mackerel and Pacific sardine; consistency of California's proposed market squid FMP, with the federal CPS FMP; reasonable maximum sustainable yield (MSY) proxies based on the egg escapement method for market squid; bycatch accounting; CPS essential fish habitat; and a five-year review of the CPS FMP.

**Harvest Guideline Formulae** – NMFS states that the recent CPS stock assessment review process could “provide a basis for considering changes in the harvest guideline formula for Pacific mackerel or... Pacific sardine.”

CPSMT response:

As discussed under Agenda Item I.2, review of the harvest guideline formulae is a valid issue for both Pacific mackerel and Pacific sardine.

Comprehensive review of the harvest guideline formulae would require approximately one year to complete via a formal research project. Specific information would include: population biomass, biomass/sea surface temperature relationship, stock distribution (U.S. waters versus Mexico and Canada), stock structure, and the cut-off value (a hedge against overfishing, currently 150,000 mt). The project could result in a new or modified stock structure hypothesis.

Relative to the other issues in the May 18 letter, this is a mid-level priority, however, as noted previously it would be a major project.

The earliest this research project could be started is June 2005. It would take at least two years to complete the research, amend the FMP, and implement through the federal rule-making process.

**California's Market Squid FMP** – NMFS notes industry concern “about the incompatibility of the State of California market squid limited entry program with the CPS finfish limited entry program under the [CPS] FMP.”

CPSMT response:

The CPSMT discussed the Market Squid FMP, with California Department of Fish and Game (CDFG) staff. The CPSMT does not consider this a valid concern, CDFG developed the state FMP in accord with the federal FMP.

The California Fish and Game Commission is scheduled to adopt the Market Squid FMP (MSFMP) on August 27, 2004, including a restricted access program. Once the Commission decides on the specifics of the MSFMP, the program will be implemented in the squid fishery season starting April 1, 2005. In developing a restricted access program, the CDFG used the criteria set forth in the federal FMP to support its recommendation of a “moderately productive and specialized” fleet capacity goal of 52 round-haul vessels, 34 light boats, and 18 brail boats. These goals are within the range of the number of vessels actively participating in the fishery in a given year and maintains a ratio of one round haul vessel to one vessel attracting squid (both light boats and brail boats) currently observed in the fleet. The recommendations include establishing limited entry permit criteria based on prior catch or fishing history and provide for full transferability of vessel permits only between vessels of comparable capacity.

**Market Squid Egg Escapement MSY Proxy** – NMFS notes “that [it appears] there is a need to address further the prospective use of the egg escapement value for determining if the stock is overfished or is subject to overfishing.”

CPSMT response:

The CPSMT perceives this issue to be about ensuring the egg escapement MSY proxy provides information for managing the fishery and monitoring stock status. It is a valid issue, but is currently being addressed.

As reported in the June 2004 CPS Stock Assessment and Fishery Evaluation (SAFE) document, there is a coordinated program (CDFG and NMFS) to develop a systematic approach to evaluate stock status and manage the squid fishery. The program includes port sampling of market squid landings, analysis of biological information, development of a systematic (spatially and temporally) assessment schedule, simulation modeling, and incorporation of the results into state and federal management processes. Other components being developed include a range of “*F*” rates, which would provide management targets to prevent overfishing and further understanding of appropriate biological reference points for monitoring status of this species. The full program should be up and running by fall 2005, initial results could be available in spring 2005. It would be prudent to plan for Scientific and Statistical Committee review during 2005.

Information from this coordinated program would be used by CDFG for inseason management, by Council in the SAFE report, and by NMFS in the status of stocks report

The CPSMT also considered market squid relative to NMFS proposed revisions to National Standard 1 guidelines. The CPSMT considers market squid to have unique management needs that do not fit well with the current National Standard 1 guidelines. Moreover, the CPSMT cautions against forcing market squid management to conform to guidelines designed for finfish, i.e., species with very different life history characteristics.

**Bycatch** – “the FMP needs to be revised to address bycatch provisions of the Magnuson-Stevens Fishery Conservation and Management Act more fully.”

CPSMT response:

The CPSMT considers this a valid, but limited, concern.

The CPSMT notes that Amendment 9 to the CPS FMP documented methods being used to monitor and minimize bycatch in CPS fisheries. The June 2004 SAFE document reports the most recent data on bycatch. Both of these sources indicate bycatch in CPS fisheries to be minimal. This finding is based on incidental catch reports from port samples of the California fishery; and port samples, logbooks, and at-sea observer data from Pacific Northwest fisheries. More recently, NMFS has initiated a pilot program for at-sea observers aboard California-based CPS fishing vessels. The CPS FMP authorizes NMFS to require at-sea observers in the CPS fishery. NMFS has indicated their intent is to evaluate the pilot project to determine if at-sea observers are warranted for the California fishery. The CPSMT fully supports the NMFS initiative and will assist and advise as necessary.

If there are specific bycatch concerns that are not being addressed nor reported in the CPS SAFE document, the CPSMT requests information from NMFS to identify these specific areas of concern.

Beyond, but related to, the bycatch issue, the CPSMT is concerned that underreporting of CPS on fishtickets could be occurring. If this is the case, fishery management and stock assessments could be effected. The CPSMT recommends the Council request the Enforcement Consultants to evaluate this issue. For example, a review of enforcement records could be undertaken to evaluate if underreporting has been detected, how frequent it has occurred, what is the violation rate, have citations been issued, etc.

**Essential Fish Habitat (EFH)** – NMFS requested the Council “complete an initial reassessment... to determine if there are any major problems with the current EFH designations.”

CPSMT response:

The CPSMT does not consider this to be a valid concern.

The CPSMT reviewed CPS EFH information in the June 2004 SAFE document and the CPS FMP. The information in these sources is complete and accurate. The CPSMT is not aware of new information that could warrant modification of the current EFH designations. Moreover, there appears to be no evidence to support development of static definitions of CPS EFH as opposed to the current dynamic definition. That is, CPS EFH is linked to ocean temperatures, which shift temporally and spatially, providing a “dynamic” definition of EFH.

If NMFS has other information that would indicate changes to CPS EFH definitions are warranted, the CPSMT will review this information for the Council.

**Environmental Impact Statement** – NMFS “believe[s] it is appropriate for the Council to initiate scoping to determine if a full EIS process is warranted for the next amendment to the CPS FMP.”

CPSMT response:

The CPSMT considers this somewhat valid and notes the FMP amendment to address sardine allocation will entail development of an EIS. NMFS also notes “there have been major changes in the fishery” since the FMP was implemented in 1999. The only “major change” the CPSMT is aware of is the expansion of the Pacific Northwest sardine fishery that has occurred since 2000, which will be the subject of review under the sardine allocation FMP amendment.

The CPSMT is not aware of evidence that a comprehensive review of the FMP is warranted. If NMFS believes a full programmatic FMP EIS for CPS (analogous to groundfish) is needed, the CPSMT suggests it would take at least two years to develop a programmatic EIS.

In summary, the CPSMT considers sardine allocation to be the top priority. The harvest guideline formulae could be reviewed, but not in the current FMP amendment. It would take at least two years to perform the research and implement changes (if necessary) to the harvest guideline formulae. Concern about compatibility between the California market squid FMP and the federal CPS FMP is unwarranted. A program to fully implement the egg escapement MSY proxy approach is underway and should be ready for use in state and federal management in 2005. From current data, bycatch in the CPS fishery does not appear a serious concern. The CPSMT will work with NMFS as they complete their pilot observer program. The CPS EFH designations appear appropriate. A program-level EIS for the CPS FMP would take at least two years to complete. The current FMP amendment to address sardine allocation will, most likely, be analyzed in an EIS.

Finally, the CPSMT recommends the Council request the Enforcement Consultants to evaluate underreporting of CPS on fishtickets. For example, a review of enforcement records could be undertaken to evaluate if underreporting has been detected, how frequent it has occurred, what is the violation rate, have citations been issued, etc.

PFMC  
08/24/04