



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

Representing California's Historic Fishery

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May 14, 2009

Mr. Don Hansen, Chair &
Dr. Don McIsaac, Executive Director
Pacific Fishery Management Council
7700 NE Ambassador Place #200
Portland OR 97220-1384

RE: Agenda Item: Experimental Fishing Permit (EFP) for Pacific coast Sardine Research including CA

Dear Chairman Hansen, Dr. McIsaac and Council members,

The California Wetfish Producers Association (CWPA) represents the majority of active wetfish fishermen and processors from both Monterey and southern California. We very much appreciate this opportunity, once again, to address the Council on the subject of Pacific sardine research.

As we testified in November 2008 and March 2009, we believe developing a second index of sardine abundance is essential to expand understanding of the sardine resource and improve sardine resource management. We very much appreciate the Council's interest in this industry-sponsored aerial/acoustic research plan, leading to your recommendation to the National Marine Fisheries Service (NMFS) to increase the research set aside by an additional 1,200 mt to provide a robust and scientifically defensible synoptic survey extending into California.

Since the March meeting we have worked closely with principal investigators of the Northwest industry survey to combine the two EFP proposals into a single Pacific coast survey, extending from Cape Flattery to Monterey Bay. The California portion of the survey is now an integral part of the EFP proposal submitted for your approval. We're making progress to execute the research plan, following Council adoption of the final EFP proposal and NMFS approval of the additional research set aside. Our activities to date include identifying participating boats and processors, committing significant funds to obtain required camera system and hydroacoustic equipment {in fact the camera system is slated for installation in the airplane on May 20 and the first of two Simrad ES 60s will also be installed the same week}. We're also planning coordination and timing of the survey itself, in routine communication with the PIs. In short, we are well on our way to readiness to begin implementing the research plan as soon as the July fishing season begins and the weather and Mother Nature cooperate – subject to final adoption and issuance of the EFP and approval of the proposed rule modifying annual harvest specifications.

In planning for this project, we attended the recent aerial survey methodology STAR, and were pleased with the overall outcome and recommendations of the panel. Borrowing from the report:

4) Implementation of Survey Protocols

An important question is whether the total EFP allocation (and how it is allocated to each area) is sufficient to achieve a useful survey.

- ***At 1200 tons from each area, the suggestion of the Technical Team (i.e., a total EFP allocation of 2400 tons), the Panel concluded that there is a good outlook for successful calibration.***

The panel also voiced concerns similar to the Science and Statistical Committee's earlier discussion questioning the scientific value of the initial 1,200 mt set aside, in essence reaffirming the Council's recommendation to increase the research allocation:

- The Panel doubts whether sufficient precision would be achieved if only 600 tons were taken from each area (a total of 1200t is currently allocated for an EFP). In the case where a total of only 1200 tons was available, the Panel recommends that the entire 1200 tons be used in only one of the two possible survey areas. Moreover, the Panel saw no compelling reason to recommend that the tonnage be assigned to a particular area of the two areas, and would prefer that the Technical Team decide how they would best use the allocation, were it only 1200t. **However, the Panel would not expect that an estimate based on a small number of point sets would provide a sufficient basis for a robust and precise estimate of abundance. If all of the allocation was taken from one area, this would provide a basis to estimate the relationship between school size and tonnage for that area, but it could not be used to estimate abundance for the entire survey area (Canadian border to Point Conception).***

Clearly, this industry-sponsored research plan holds great promise to expand knowledge of the Pacific sardine resource **IF** it is conducted in the manner described in the Pacific coast EFP application, including the full 2,400 mt research allocation, apportioned 1,200 mt to the PNW and 1,200 mt to California, and with survey area as synoptic as possible, at least covering the coast from Cape Flattery to Monterey Bay.

CWPA, California's wetfish industry and the CA members of the CPS Advisory Subpanel recognize the importance of this research and urge the Council to approve the Pacific coast sardine EFP as amended. We further support the Council's recommendation that the original 1,200 mt research set aside be increased to 2,400 mt to provide sufficient point sets in each area to enable a robust survey that has the potential to be considered as a minimum estimate of absolute abundance of Pacific sardine. A successful survey will be useful to inform the 2009 sardine stock assessment. Moreover, by continuing the survey over multiple years, it will provide a basis for a new relative index of abundance.

We are fully committed to ensure the success of this research project. In CA the use of the research set aside will be taken under the guidance of CA scientists, in coordination with PNW scientists, with the goal to achieve representative samples of school size. In addition, we will also use our Biosonics DT-X, modified {at further expense} and deployed with both down-sound and side-looking capabilities to better quantify school height and density. Further, the SW Fisheries Science Center is interested in participating in expanded hydroacoustic research, and has offered to deploy its state-of-the-art acoustic equipment in conjunction with our summer survey, with the intent of developing an acoustic estimate of abundance that can be expanded into southern CA in the fall.

Again, we appreciate the Council's interest in this research and urge the Council to approve the Pacific coast sardine EFP application, allowing CA to participate in this research project after the summer directed fishing period has closed. We also encourage the Council to reaffirm your recommendation to NMFS to expeditiously approve the additional 1,200 mt research set aside, and to issue the experimental permits without delay.

Thank you for your consideration.

Best regards,



Diane Pleschner-Steele
Executive Director