

June 3, 2015

Ms. Dorothy Lowman, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

RE: Agenda Item G.4: Proposed Terms of Reference for Sardine Distribution Workshop

Dear Chair Lowman and Council Members:

We look forward to the Council's workshop to reevaluate the distribution parameter in the Pacific sardine harvest control rule scheduled for August 17-18, 2015. We appreciate and support the draft proposed Terms of Reference for the workshop (Agenda Item G. 4, Attachment 2), and offer our suggestions below.

The settlement agreement does not limit the number of alternatives workshop participants may consider. We note that the authors of the draft Terms of Reference propose to add an additional alternative beyond the four required by the Settlement Agreement. Specifically, the report authors added an industry proposed alternative to use "a temperature-based model to predict the proportion of Pacific sardines in U.S. waters for a particular year." In turn, we ask that the Council add the following alternative to the Terms of Reference:

"Subtracting the previous year's landings from Mexico and Canada from the coastwide OFL and HG to determine the U.S. OFL and HG respectively, based on the method published in the Proceedings of the National Academy of Sciences by NMFS SWFSC scientists David Demer and Juan Zwolinski."

Furthermore, we request that an Oceana representative participate as a Workshop Principal, filling the open conservation scientist position. In that role, we would like the opportunity to give a formal presentation to outline our concerns with the distribution parameter as currently formulated in the sardine harvest control rule.

Oceana is concerned that the current formulation of the distribution term does not ensure coastwide catch rates stay within the coastwide target harvest rates as determined in the U.S. harvest control rule. Given this is a transboundary fish stock, it is critical that catch levels in Mexico and Canada are addressed. We hope that the analysis

done at the upcoming workshop will assist the Council in formulating a comprehensive management strategy to improve the management of Pacific sardines off the U.S. West Coast, taking into account international fishing pressure.

Sincerely,

A handwritten signature in black ink, appearing to read "Geoff Shester". The signature is fluid and cursive, with the first name "Geoff" being more prominent than the last name "Shester".

Geoffrey Shester, Ph.D.
California Campaign Director

A handwritten signature in black ink, appearing to read "Ben Enticknap". The signature is more stylized and less legible than the one on the left, with a long horizontal stroke at the end.

Ben Enticknap
Pacific Campaign Manager & Senior Scientist