



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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April 4, 2016

Ms. Dorothy Lowman, Chair
And Members of the Pacific Fishery Management Council
7700 NE Ambassador Place #200
Portland OR 97220-1384

RE: Agenda Item H.1 Pacific Sardine Specifications & Management Measures

Dear Ms. Lowman and Council members,

As Executive Director of the California Wetfish Producers Association (CWPA), representing the majority of coastal pelagic species 'wetfish' fishermen and processors in California, I appreciate your consideration of the following points in the continuing discussion regarding sardine management.

First, it is important to understand that the sardine harvest control rule is extraordinarily precautionary – perhaps the best example of ecosystem-based management in the world. **“The CPS Management Team recommended control rule [adopted by the Council] significantly reduces the allocation of surplus production to the fishery in favor of considerably higher biomass levels for forage.”** (Richard Parrish, PhD, Agenda Item E.2.c, Public Comment November 2014).

It is also important to note that the sardine HCR is based on stock assessments that are acknowledged to have great uncertainty. This is coupled with a lack of flexibility in the Terms of Reference to adapt management to the reality observed in the ocean, especially during assessment “update” years. This is a recipe for disaster – and the impact is already being felt by California’s historic wetfish industry.

Thankfully, the SSC Subcommittee acknowledged multiple lines of evidence documenting a large recruitment event of sardine (and anchovy) in 2015. Fishermen have also reported large schools of both small and larger sardines since last summer, and have delivered several samples of the small fish to both the SW Fisheries Science Center and Department of Fish and Wildlife, but neither samples nor observations could be incorporated in this assessment. The 2015 SaKe cruise also captured an abundance of small sardines, but when the length comps. for those fish were included in the model, the model predicted a biomass of 1+ million tons, which the stock assessment team thought was implausible, thus those data were also excluded. However, in light of the evidence of recruitment, the SSC Subcommittee did recommend using the Stock-Recruit function in the model to predict biomass, but the model then estimated a biomass of only about 106,000 mt, below the Cutoff allowing a directed fishery.



California fishermen and markets attending the Council meeting will testify to the abundance of sardine that they have been seeing in the ocean since last summer. I'm receiving near-daily calls from fishermen in both S.CA. and Monterey about sardine abundance. Fishermen and markets alike wonder why Council management policy is quick to consider emergency closure, but there is no comparable "emergency" policy to reopen a fishery when fish are abundant in the ocean, but obviously missed in field surveys that could not measure fish in the nearshore, where the majority of catch occurs in CA, nor in the upper 10 meters of the water column, where fishermen in the Pacific Northwest see and harvest sardines. For any scientist or Council member who would like to see what the fishermen see in the ocean, I extend standing invitations from numerous purse seine skippers who have offered to take them out on a trip.

Meanwhile, it is apparent that we need to improve field surveys, as well as model assumptions, on which assessments are based,. CWPA is willing to participate however we can to advance cooperative research. We also offer the following recommendations:

General

- Reiterating recommendations made by the SSC and CPS advisory bodies last year, it is critically important for the Acoustic Trawl Method to undergo methods review as soon as possible, in particular to reevaluate the model assumption that q (catchability quotient) is 1, meaning that acoustics "see" all the fish.
- The May assessment workshop should reconsider assumptions in the sardine model, specifically re-evaluate natural Mortality, in light of the exponential increase in marine mammal populations, especially sea lions, since the Amendment 8 model assumptions were developed in the 1990s.
- The Terms of Reference for stock assessments should be revised to provide flexibility, particularly in update years, to incorporate new findings and data into assessments that more accurately reflect conditions in the ocean. The TOR should also provide for a process to reopen a fishery based on new lines of evidence as soon as possible, rather than the current requirement to wait for the next full assessment. Without flexibility to adaptively manage dynamic CPS stocks, industry is forced to sit idle for the better part of one or even two years, potentially beyond its economic tipping point.

Sardine fishery management

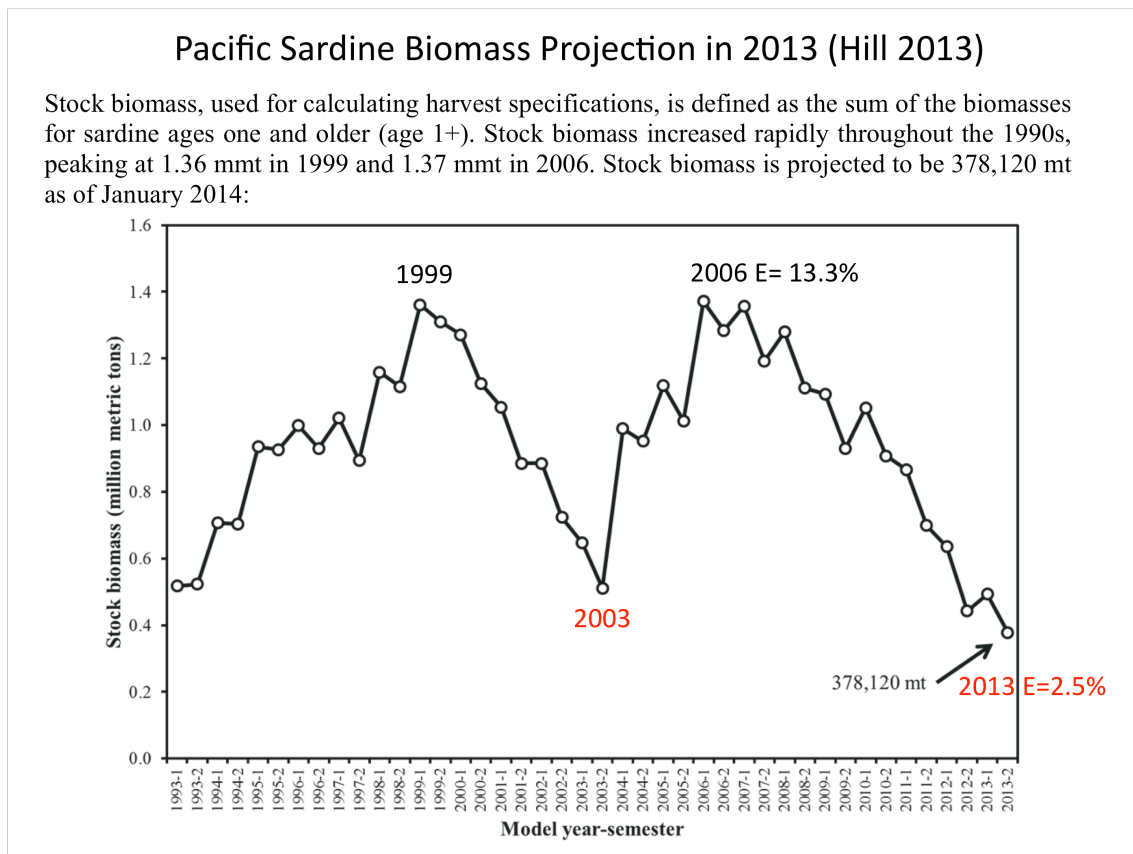
Please understand the importance of sardines to California's wetfish industry. From historic times to the present, this industry has relied on a complex of coastal pelagic species, including sardines as the foundation of the fishery – the "potatoes" – while mackerels and anchovy are seasonally important, and market squid is "the gravy." Sardines are one very important leg of a three- or four-legged stool. Until the last year or so, **California's wetfish industry has produced on average 80 percent of total fishery landings, and close to 40 percent of dockside value statewide.**

We know that pelagic fishes of the same size often school together. Sardines typically school with other CPS species, and are appearing in significant number in other CPS catches, so a reasonable allowance of sardine caught incidentally in these other fisheries will be necessary to keep wetfish boats fishing and processors' doors open. California's wetfish industry also is hugely important to fishing communities as it supports harbor infrastructure and allied businesses. The incidental set-aside can help the wetfish industry survive the tough times they're currently experiencing.

We support the precautionary sardine HCR that closes the directed fishery when the population declines below the cutoff level, but without a reasonable allowance of sardine caught incidentally in other fisheries, California's wetfish fleet will be tied to the dock, and market doors closed, which would seriously harm California's fishing economy.

Please also understand that achieving **Optimum Yield requires balancing both fishery opportunity and economic stability along with forage needs.** We would appreciate the Council's recognition of the continuing importance of the sardine resource to California's historic wetfish industry.

As a final footnote, I am including here a graph compiled by Dr. Richard Parrish a couple of years ago, illustrating the decadal variability of sardines. Note that the 2007 peak abundance occurred a few years after the 2003 El Niño. We may be experiencing a similar resurgence, based on the abundant recruitment observed in the 2015 SaKe cruise, The 2015 NOAA Rockfish Recruitment and Ecosystem Assessment cruise report, which stated: "Adult Pacific sardine and northern anchovy catches remained low in all areas as in prior years, but catches of larvae and pelagic juveniles [for 2015] were the highest ever in the core and north and still relatively high in the south (Appendix III)." These field studies corroborate the abundance of sardines that fishermen have been reporting since last summer.



Thank you for your attention to these comments.

Diane Pleschner-Steele
Executive Director

Cc: Ms. Eileen Sobeck, Assistant Administrator, NMFS
William Stelle, Regional Administrator, West Coast Region
Barry Thom, Associate Deputy Regional Administrator, NMFS
Frank Lockhart, NMFS
Charlton Bonham, Director, CDFW