

# CALIFORNIA WETFISH PRODUCERS ASSOCIATION

PO Box 1951 • Buellton, CA 93427 • Office: (805) 693-5430 • Mobile: (805) 350-3231 • Fax: (805) 686-9312 • www.californiawetfish.org

March 15, 2017

Mr. Herb Pollard, Chair And Members of the Pacific Fishery Management Council 7700 NE Ambassador Place #200 Portland OR 97220-1384

RE: Agenda Item G.2. Anchovy OFL Process

Dear Mr. Pollard 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 our continuing concerns in the ongoing discussion regarding anchovy management.

Summarizing points made in our earlier Council testimony and comments [F.3.c.Sep '16, F.4.c. Nov '16]:

- "... the biomass of the central stock of northern anchovy is extremely variable and that this <u>variability occurs</u> with and <u>without</u> a significant fishery on the stock. [Richard H. Parrish, Agenda Item H.3.b Supp. Public Comment 4, Nov 2015]
- "... In 2015, the catch-per-tow of northern anchovy YOY ... was at record levels over the 2015 sampling period, with the frequency of occurrence near 80% for the entire survey... This would suggest that 2015 <u>summer anchovy spawning was widespread</u> ..." [Juvenile Rockfish Midwater Trawl survey for pelagic juvenile (young-of-the-year, YOY) rockfish Central California Coast, May-June 2015 [pages 3-4]].
- Fishermen have observed and continue to observe a great abundance of anchovy of various sizes [small to large] from northern to southern California. Fishermen presented evidence of this abundance during public comment at the November 2016 meeting. This recruitment was not included in the egg/larval assessment developed in 2016.

The SSC November '16 Supplemental Report identified several important steps and data needs that must be considered to develop a revised OFL:

- Estimate F<sub>MSY</sub> or identify a suitable proxy
- Develop methods for estimating total stock biomass, which would at minimum require calibrating survey estimates to account for unsampled areas
- Preferably analyze all the data in an integrated stock assessment.

The SSC report also noted "the importance of considering time lags introduced by the collection, processing and analysis of abundance data due to the highly dynamic nature of anchovy." Further, the report commented that any development of procedures for updating OFLs and allowable biological catches for monitored stocks, while useful, "should be based on an understanding of the population demographics of these species," preferably via some form of population dynamics model.

The extreme variability of anchovy was also highlighted in a comment submitted by Dr. Richard Parrish in November 2015 [H.3.b. Supp. Comment 4, Nov 2015]: "Clearly the biomass variations ... demonstrate that in the central stock of northern anchovy biomass estimates are worth very little for real time management if they are more than one year old."

In another comment [G.4.c. Nov 2016], he wrote: "The fact that the annual egg and larval abundance estimates rose by nearly an order of magnitude from 2004 to 2005 and fell by more than an order of magnitude from 2005 to 2007 should convince anyone that real time management of the central stock of anchovy based solely on the egg and larval estimates do not even allow the determination of the year-class of the super abundant cohort."

Dr. Parrish also stated: "The original CPSMT (of which I was a member) decided that the egg and larval surveys were not accurate enough to be used to calculate the spawning biomass of the central stock and the stock was therefore not managed on an annual basis."

In fact, northern anchovy was assigned to Monitored status at the onset of Amendment 8, expressly because landings had shrunk dramatically from the heyday of the fishery, when large volumes of anchovy were landed primarily for reduction. Catches have remained well below their respective ABC/ACL levels since implementation of the CPS FMP in 2000.

As both the SSC and CPS management team have acknowledged, neither the CalCOFI egg/larval production nor Acoustic Trawl surveys cover the full range of anchovy. Neither method surveys the nearshore [inside 50 meters], and neither method has measured the **total abundance** of anchovy (and sardine) observed by fishermen in recent years.

Further, there is a dearth of aged samples available to inform Daily Egg Production Method (DEPM) estimates. As the SSC noted in its November 2016 Supplemental Report, "A proper expansion from eggs and larvae to spawning biomass would require data on sex ratio, mean female weight and fecundity." The SSC agreed that it would be inappropriate to scale egg/larval indices using DEPM estimates from the 1980s, now the only data available.

The Council action at this meeting is to provide guidance on the process, timeline and alternatives for developing a revised OFL for California anchovy. It is important to understand that anchovy biomass variability demonstrates the extremely difficult, and impractical, task of attempting to assess anchovy on an annual basis. Annual stock assessments would be hugely expensive for a fishery that has averaged less than 10,000 mt per year over the past two decades.

Moreover, In a lightly fished, highly dynamic monitored stock like anchovy, OFL should not be based on a single stock assessment. Rather, OFL/MSY is intended to reflect the <u>largest average fishing mortality rate</u> that can be harvested over the long term.

Please recognize that catches have averaged less than half of the precautionary 25,000-mt limit since the 1980s. As Dr. Richard Parrish pointed out, "The fact that the stock [biomass] remained in the 0.2 to 0.5 MMT range from 1990 to 2004, surged to over 2.0 MMT in just two years and then fell by more than an order of magnitude in the next couple of years does not appear to have been "monitored" or noticed. The anchovy fishery showed no response to the increased population... Fishery management has had essentially no impact as the conservative annual quota was larger than the market."

The CPSMT White Paper on Anchovy Management [E.3.a Sep 2016] noted an increase in California anchovy landings in 2015 [to about 17,500 mt – still well below the precautionary harvest limit], and stated, "... when higher value fisheries such as market squid and Pacific sardine are slow due to lack of availability to the fishery or

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season closures, northern anchovy landings tend to increase...". This was clearly the case in 2015, with the sardine fishery closed and squid on sabbatical due to El Niño. California's anchovy fishery provides a lifeline to fishermen and markets alike, keeping the boats on the water and market doors open during slack times. California's anchovy fishery is like an insurance policy.

Also important to note, a recent study, When does fishing forage species affect their predators? [Hilborn, R. et al, Fisheries Research, Amsterdam] finds that variability in small coastal pelagic fish (i.e. anchovy and sardine) is controlled predominantly by the environment. Scientists concluded that patterns appear to be driven by both density-dependent and density-independent dynamics (Lindegren et al. 2013) and have been ongoing long before the presence of commercial fishing.

The study also shows that neither anchovy nor sardine abundance influences the rate of change in predator abundance (i.e. sea lion or brown pelican populations). Current management of CPS stocks is precautionary, conservative, and successful. Fishing pressure is generally negligible compared to the large-scale effects of environmental forcing.

Clearly, there is no biological point of concern re: anchovy abundance, but there could be a serious socioeconomic point of concern if the small harvest limit now allowed in the CSNA fishery is further restricted.

The reduction fishery is history now. However, the anchovy fishery is still very important to California's historic wetfish fleet as a target when no other CPS are available. A further reduction in current harvest limits, precluding fishing opportunity to fish on anchovy in slack times, could be the proverbial last straw that curtails California's wetfish industry, the backbone of California's fishing economy.

We again recommend that the Council:

[1] retain the status quo management option for the California anchovy fishery, with the current harvest specifications, which represent a reasonable <u>average OFL</u> and precautionary harvest limit, in light of the variability in anchovy abundance and the negligible impact of the fishery on the resource and dependent predators.

[2] acknowledge recent record anchovy recruitment and

[3] recognize the need to expand surveys to completely assess biomass (both anchovy and sardine) in nearshore habitat [inside 50 meters], as well as the upper water column.

Because of its importance to California's historic wetfish industry and negligible impact on the ecosystem, this fishery should be allowed to continue under its current management framework.

Thanks very much for your consideration of these recommendations.

Our best regards,

Diane Pleschner-Steele Executive Director

# Prey abundance and predator rate of change in the California Current

\*The following information is from Hilborn, R., Amoroso, R, Bogazzi, E., Jensen, O.P., Parma, A, Szuwalsky, C., Walters, C.J., accepted for publication in Fisheries Research – tentative release date March 30, 2017.

When does fishing forage species affect their predators? Fisheries Research (Amsterdam).

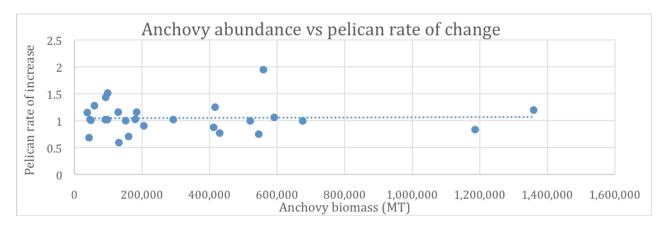
Data compiled by Joel VanNoord, supervising scientist for the California Wetfish Producers Association.

## **Key findings:**

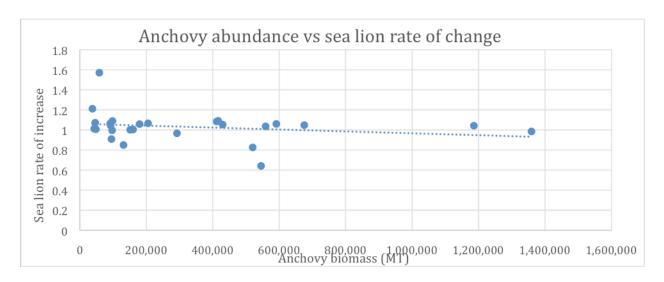
- Predator rate of increase is uncorrelated with forage fish abundance.
- Forage species are affected much more by environmental conditions than by fishing.
- Previous analysis of forage fish impacts on predators ignored natural variability.
- · Spatial distribution of forage species may be more important than their abundance.
- Predators often take small forage fish that are unaffected by fishing.

# Neither anchovy nor sardine abundance influences the rate of change in either Sea Lion or Brown Pelican populations.

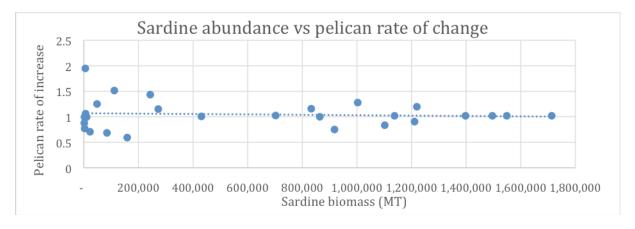
If anchovy or sardine populations controlled the growth rate of predators, we would expect an increasing population growth rate for predators with an increasing sardine or anchovy population. For example, the predator population would increase as more prey became available. Abundance data do not support this, however. We see a constant predator growth rate regardless of the population size of either anchovy or sardine.



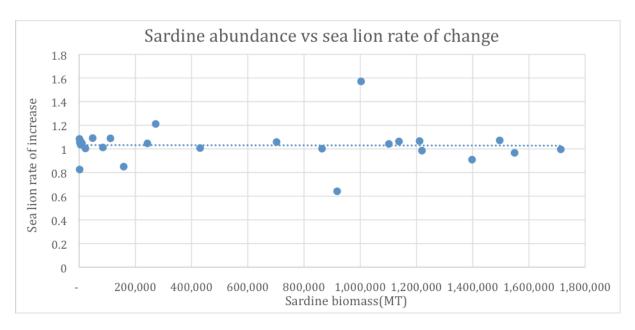
The estimated yearly biomass of the central subpopulation of northern anchovy ranged widely, from ~40,000 to nearly 1.4 million metric tons during the period from 1981-2009. Despite a wide range of anchovy prey available, the rate of increase of pelican nests remained unchanged during the same time period. A rate of change value of 1 indicates no change in the population. This pattern is similar for both predator and prey relationships, shown in the three graphs below.



The amount of anchovy prey available in the water also had little effect on the rate of change on the abundance of sea lion pup counts from 1981-2006.



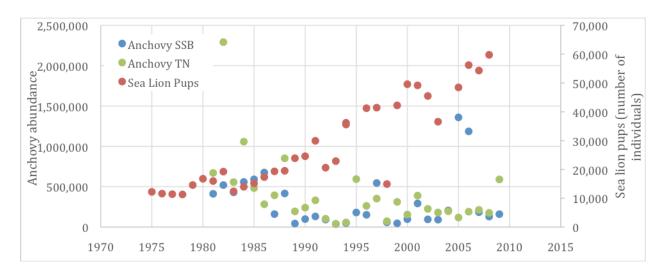
Sardine abundance ranged from < 7,000 to ~1,700,000 MT during the period from 1981-2007. Despite this wide range of estimated prey available in the water from year to year, the rate of change of pelican nests was not affected by this, meaning the growth rate was the same whether there were 7,000 MT of sardine, or 1,700,000 MT.



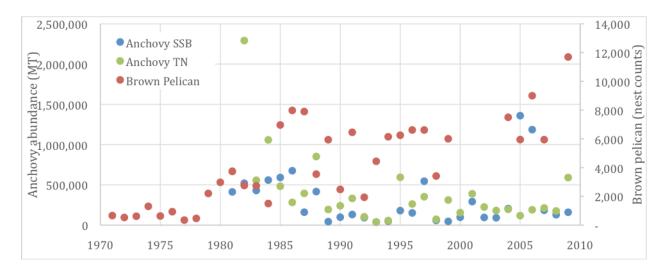
The amount of sardine prey available in the water also had little effect on the rate of change on the abundance of sea lion pup counts during the period from 1981-2006.

# Predator populations increased while prey declined

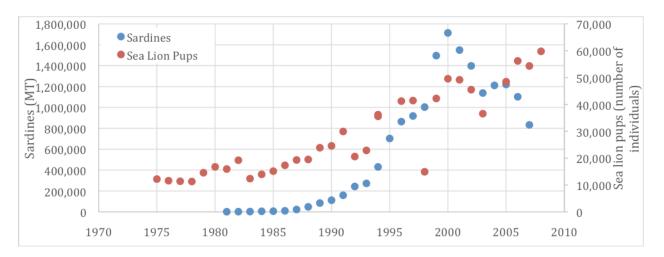
Sea Lion and Brown Pelican abundances have increased steadily from 1971 to 2009 despite declines and variability in anchovy and sardine populations. This is especially evident for anchovy populations, which seem to show an inverse relationship with sea lion pup counts. This shows a thriving predator population increasing over time, despite variability in prey populations and declines in anchovy abundance.



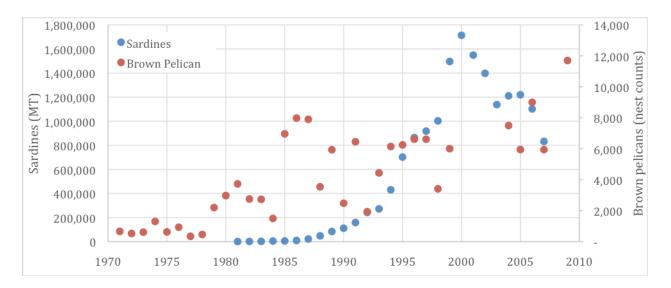
Sea lion pup counts increased dramatically from the 1970's to the present, despite an overall decrease in anchovy biomass available. The sea lion abundance increase is largely associated with the success of increased protections enacted with the 1972 Marine Mammal Protection Act. The major drop in sea lion pup counts seen in 1998 was largely attributed to warm ocean waters caused by the historically strong El Niño of 1997-98.SSB refers to spawning stock biomass, TN refers to total numbers.



Brown pelican nest counts were as low as 663 nests in the early 1970's. These low population levels are largely due to the widespread use of pesticides, such as DDT and dieldrin, which caused high hatching mortality due to a thinning of the egg shells. After the elimination of these pesticides, brown pelican nest counts rose dramatically during the 1980's to a high of ~12,000 nests in 2009, this is despite decreasing and variable anchovy population estimates, indicating that the population recovery was largely due to the removal of poisons from the environment, and not the availability of additional prey resources.



Sardine and sea lion pup counts were in sync from the 1980's through 2000, when the sardine population began to decline, largely due to a changing oceanographic regime. Despite this drop in sardine prey availability, sea lion pup counts continued to increase.

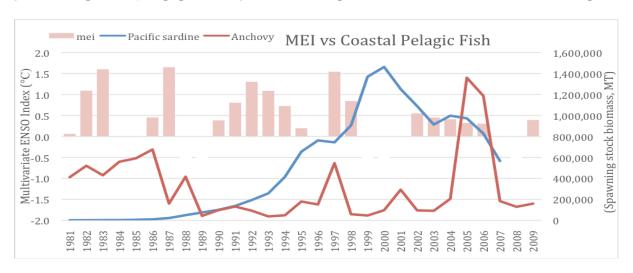


Brown pelican nest counts were very low in the 1970's, in large part to the widespread use of pesticides and such as DDT and dieldrin, which caused a thinning of pelican egg shells. After the elimination of these pesticides, brown pelican nest counts rose dramatically during the 1980's, a period when the sardine population was low. The brown pelican population then leveled off as the sardine population hit an estimated high in 2000 before dropping off again. Brown pelican nest counts were largely uninfluenced by sardine abundance.

#### Small coastal pelagic fish variability controlled by the environment

Anchovy and sardine are short-lived species that undergo periodic, asynchronous and large-scale population fluctuations that are driven by warm and cool phases of the El Niño Southern Oscillation and the Pacific Decadal Oscillation. We can see that in the time series below, where the anchovy population is initially high, drops, and begins to rebound. The sardine population is initially low, peaks in 2001, and begins to decline. This pattern has been ongoing long before the presence of commercial fishing. Lindegren et al. (2013) modeled the population fluctuation from the 1660's onward and found the same large-scale and asynchronous patterns of population expansion and contraction.

These patterns were concluded to be driven by both density-dependent and density-independent dynamics (Lindegren et al. 2013). Management of these stocks is precautionary, conservative, and successful. Fishing pressure is generally negligible compared to the large-scale effects of environmental forcing.



Notes and sources of data:

Data prepared by:

Hilborn, R., Amoroso, R, Bogazzi, E., Jensen, O.P., Parma, A, Szuwalsky, C., Walters, C.J. submitted. When does fishing forage species affect their predators? Fisheries Research (Amsterdam).

Brown Pelican: data were extracted from a graph reported at <a href="http://www.esasuccess.org/birds.shtml">http://www.esasuccess.org/birds.shtml</a>

#### California Sea Lion:

Carreta, J. V, Forney, K. A, Oleson, E., Martien, K., Muto, M. M., Lowry, M. S., Barlow, J., Baker, J., Hanson, B., Lynch, D., Carswell, L., Brownell Jr., R., Robbins, J., Mattila, D. K., Ralls, K. and Hill, M. C. 2011. US. Pacific Marine Mammal Stock Assessments: 2011. NOAA-TM-NMFS-SWFSC-448. 356 pp.

#### Pacific Sardine:

Hill, K.T., Dorval, E., Lo, N. C. H., Macewicz, B. J., Show, C. and Felix-Uraga, R. 2007. Assessment of the Pacific Sardine Resource in 2007 for U.S Management in 2008. NOAA-TM-NMFS-SWFSC-41. 157 pp.

#### Northern Anchovy:

Fissel, B. E., N. C. H. Lo, and S.E. Herrick. 2011. Daily egg production, spawning biomass and recruitment for the central subpopulation of northern anchovy 1981–2009. CalCOFI Rep. 52:116-129.

Lindegren, M., Checkley, D.M. Jr., Rouyer, T., MacCall, A.D., Stenseth, N.C. 2013. Climate, fishing, and fluctuations of sardine and anchovy in the California Current. PNAS. 100:33, 13672-13677.

Abundance of anchovy and sardine correspond to the best estimates of the spawning biomass expressed in metric tons. In the case of the California Sea Lion, the preferred time series of abundance correspond to pups counts. For Brown Pelican, we used the number of nests as a proxy for abundance.

Rate of change for predators was calculated by subtracting the log of next year's abundance from the log of the current year's abundance estimate, divided by the number of years between counts, and then taking the exponentiation of that. So that,

Rate of Change= elogabund. y2-log(abund.y1)y2-y1,

Where e is the exponential, abund y2 is predator abundance in the subsequent year, abund y1 is predator abundance in the current year, y2 is the subsequent year, and y1 is the current year.





March 16, 2017

Mr. Herb Pollard, Chair Pacific Fishery Management Council 7700 NE Ambassador Place, Suite 101 Portland, OR 97220-1384

RE: Agenda Item G.2: Central Subpopulation of Northern Anchovy OFL Process

Dear Chair Pollard and Council Members,

The Pew Charitable Trusts is submitting public comment on behalf of 718 anglers and outdoor enthusiasts who support the development and adoption of updated management measures for northern anchovy. These advocates attended one of several sportfishing events along the West Coast in early 2017, including the Northwest Sportsmen's Show in Portland, OR, and the Fred Hall Show in Long Beach, CA.

The petition itself is included here, along with a compilation of the names, cities and states of individual signers that were submitted to the Council as of this morning, March 16, 2017. You may continue to receive additional messages over the next two weeks.

Thank you for your time and consideration. We appreciate the opportunity to work with you to maintain sustainable fisheries and healthy ocean ecosystems.

**Bobby Hayden** 

Romage

Senior Associate, U.S. Oceans, Pacific

The Pew Charitable Trusts

rhayden@pewtrusts.org

Mr. Herb Pollard, Chair Pacific Fishery Management Council 7700 NE Ambassador Place, Suite 101 Portland, OR 97220

Dear Chair Herb Pollard and Pacific Fishery Management Council members:

Northern anchovies are among the most important forage fish in the California Current ecosystem, but management of the stock is based on decades-old information. These fish are a critical food source for salmon, tuna, brown pelicans, humpback whales, and dozens of other marine species. In light of scientific studies showing that anchovies are now at very low numbers, I encourage you to act.

Please adopt an ecosystem-based management framework that protects northern anchovies' crucial role in the Pacific Ocean food web, with measures such as catch limits informed by the best available science and a precautionary cutoff that suspends fishing when populations are low. These efforts can ensure adequate prey for dependent predators, prevent overfishing, and support strong coastal communities.

Sincerely,

We the undersigned:

Bob Kurz	Anna Caldwell	<b>Brad Shearson</b>
Laguna Niguel, CA	Los Angeles, CA	San Diego, CA

Sally Kurz	Anneka Boone	Angel Yin
Laguna Niguel, CA	Los Angeles, CA	Arcadia, CA

SM McDonald	Anthony Vale	Brenton Woolworth
Glendale, CA	Lakewood, CA	Irvine, CA

Vanice Villa	Art Loya	Brian Larson
Los Angeles, CA	San Bernardino, CA	Los Angeles, CA

Richard Valenzuela	Andy Vierra	Paula Segurna
Long Beach, CA	Sacramento, CA	Fresno, CA

Justin Adkins	Baya Kabba	Mayra Cabrera
Glendora, CA	Torrance, CA	Chino, CA
		John Falling

		John Falling
Alana Herrera	Joseph Hough	Waianae, HI
Los Angeles, CA	Fawnskin, CA	

		Carl Barry
Ashley Albo	Marina Ferguson	Long Beach, CA
Laverne CA	Huntington Reach, CA	

		Mark De la Torre
Andrea Kemp	Bradley Goodard	Costa Mesa, CA
Santa Monica, CA	Gardena, CA	

Chase Puentas Hannah Germonpez Karla Martinez Avalon, CA Los Angeles, CA Los Angeles, CA Chris Hogh Gregg Hedrick Kathleen Medina Las Vegas NV El Segundo, CA Murrieta, CA Clara Holmes Guillaume Pfahl Kaytee Canfield Long Beach, CA Larkspur, CA San Luis Obispo, CA Christian Gange Sergio Perez Kaz Hata San Diego, CA Seal Beach, CA Long Beach, CA Carl Brealey John Hampton Kimberly Zwefow Oceanside, CA Rancho Cucamonga, CA Long Beach, CA Alan Skobin Jacqueline Covarrubias Kirk Scholrecck Rialto, CA Manhattan Beach, CA Chatsworth, CA Isabel Villarreal Damien Parker Kirk Lindemann Long Beach, CA Buena Park, CA Huntington BeacH, CA David Davila David Pi Kim McAlister Lakewood, CA Los Angeles, CA San Diego, CA Diana Raimondo Jarrell Bergado Kristy Moore Signal Hill, CA Long Beach, CA Riverside, CA Chris Skytte Jeff Bloks Kellsie Warrell Garden Grove, CA Monrovia, CA Menifee, CA Don Lee Jacob Luera Lee Lewis Seal Beach, CA Azusa, CA Menifee, CA Dustin Senella Jim Shankin Ann Lorri Costa Mesa, CA Santa Barbara, CA Pasadena, CA Evan Nelson Louis Lee Mike Allen Laguna Niguel, CA San Pedro, CA Santa Clarita, CA **Kye Cror** Jared Benites Marc Andelsen El Segundo, CA Anaheim, CA Apple Valley, CA Eric Andersen Joseph Surgoft Marisse Turner Anaheim, CA Hemet, CA Long Beach, CA Erika Shintaky Randy Flores Marleah Turner Torrance, CA Gardena, CA Long Beach, CA Joshua Potter Max Miller Eric Shintaky Gardena, CA La Canada, CA Calabasas, CA

Michele Fox Rairaiaw Moffatt Tayler Caldwell Hemet, CA Upland, CA Claremont, CA Terri-Ann Skelly Mick Woodbury Richard Aho Huntington Beach, CA San Diego, CA Anaheim, CA Gabriella DeMarco Barbara Mitchell Rick Braddock Buena Park, CA Simi Valley, CA Los Angeles, CA Michael Quill Ronney Sakoda Timothy Courtemarche San Clemente, CA Hacienda Heights Topanga, CA Jeff Jamile Rusty Wetzel Walter Aguirre Morro Bay, CA Goleta, CA Rancho Bernardo, CA Marcia Caldwell David Swing Tyler Little Seattle, CA Ontario, CA Newport Beach, CA Eddie Madrid Trevor R Sally McCarty Artesia, CA Long Beach, CA Long Beach, CA Robert Nigbor Sean Watson Tom Schiff Altadena, CA San Francisco, CA San Diego, CA George Maturin Scott Parker Will Braddock San Ysidro, CA Long Beach, CA Simi Valley, CA Nathaniel Lewis David Smith Hugh Lee La Canada Flintridge, CA Long Beach, CA Anaheim. CA Mason O'Rosky Bruce Lindemman Zach Kauffman San Diego, CA Newport Beach, CA Silverlake, CA Paula McFarlan Romeo Ricarte Jr. Lilet Baker San Clemente, CA Baker, CA San Diego, CA Pearl Parker Sam Kobban Norman Orida Long Beach, CA El Segundo, CA San Diego, CA Sherwood Prusso Jr. Sam Shramboy Darlen Lee Buena Park, CA Huntington Beach, CA Stanton, CA P. Shawn Peter Syapin Samuel Sun Camarillo, CA El Monte, CA Santa Barbara, CA Robert McGinty Esteban Gonzalez Charles Garnsey Mission Viejo, CA Long Beach, CA Ojai, CA Gerard Edwards Tammy Strass Kathryn Cabral Lake Forest, CA Ontario, CA Redlands, CA

Lusitano de Coto	Robert Slater	Patricia Araiza
Placentia, CA	Carson, CA	Los Angeles, CA
Christian Vasquez	Glen Apal	Maria McDonald
Huntington Beach, CA	Carson, CA	Los Angeles, CA
Andrew Covarrubias	Haazie Samad	Elliot Wezerek
Rialto, CA	Long Beach, CA	Los Angeles, CA
Laura Leza	James Campbell	Matt Binder
Riverside, CA	Bishop, CA	Los Angeles, CA
Mark Landre	Randy Caffin	Michael Wayman
La Mirada, CA	Beverly Hills, CA	Los Angeles, CA
Jocelyn Tejeda	Gregg Money	Alvaro Delgado
Whittier, CA	Pasadena, CA	Los Angeles, CA
Jose Tejeda	Rock Arden	Francis Maldonado
Whittier, CA	Monrovia, CA	Los Angeles, CA
Nicole Tejeda	Nanette Smith	Melissa Martinez
Whittier, CA	Huntington Beach, CA	Los Angeles, CA
Janet Steele	Russ Butcher	Grace Nolan
Mission Viejo, CA	Newport Beach, CA	Los Angeles, CA
Kent Wetzel	Irvin Hirsch	David Gasperil
Spanish Fork, UT	Montrose, CA	Los Angeles, CA
Han Donnelly	Alexander Marquez	Ignacio Aguilar
Santa Cruz, CA	San Bernardino, CA	Los Angeles, CA
Sara Lomorieo	Tom Striewig	Brad Davies
Dana Point, CA	Long Beach, CA	Los Angeles, CA
Nannette Okada	Greg Stoll	Edwin Iniguot
Huntington Beach, CA	Long Beach, CA	Los Angeles, CA
Jesus Garza	Korben Gradoville	Richard Tapia
Fullerton, CA	Santa Maria, CA	Los Angeles, CA
Charles Moore	Cayden Gradoville	Jovi Bantono
Norwalk, CA	Santa Maria, CA	Los Angeles, CA
Jo Ann Nunez	Charles Wells	Rich Xifo
Long Beach, CA	Gardena, CA	Los Angeles, CA
Gerald Hartz	Mia Stewart	Mike Alaniz
Edwards, CA	Long Beach, CA	Los Angeles, CA

Hailey Reinschild Madison Haves Marco Vasquez Los Angeles, CA Malibu, CA Whittier, CA Nikhil Asken Ralph Ramirez Mike Munoz Los Angeles, CA Maywood, CA Whittier, CA Sherman Patrick John Issac Casey Way Los Angeles, CA Pacific Palisades, CA Whittier, CA Ian Camarillo Rafael Pascual Roger Valeri Rancho Palos Verdes, CA Bell Gardens, CA La Habra, CA Manuel Perez Paul Derrico Lance Graspirra Bell Gardens, CA Redondo Beach, CA La Habra, CA Steve Puls Eric Norlin Amy Chan Beverly Hills, CA Montebello, CA Redondo Beach, CA L. Hashler Jacano Vacequez Augie Aguayo Compton, CA South Gate, CA Pico Rivera, CA Jose Navarro Audres Gutierrez Dave Newcamp Downey, CA Topanga, CA Pico Rivera, CA Grisha Drah Walter Griffin Angela Gonzalez Santa Fe Springs CA El Segundo, CA Inglewood, CA Stefan Ignjutonic Maurice Cooper Dino Visciglio El Segundo, CA Inglewood, CA Cerritos, CA Carlis Gutierrez Michael Moore Jones John Hawthorne, CA Santa Monica, CA Cerritos, CA Eleanore Pernisco Douglas Gee Carlos Ortega Hawthorne, CA Santa Monica, CA Cerritos, CA Jeremiah Yeh Diego Fed Pernisco Kim Thompson Hawthorne, CA Santa Monica, CA Bellflower, CA Abisai Garcia Richard Gossett Joe Mora Harbor City, CA Hawthorne, CA Torrance, CA Marvin Holland Evelyn Gossett Patrick Nomura Torrance, CA Hawthorne, CA Lakewood, CA Neal Tyler Rich Kenworth Lara Edwards Malibu, CA Torrance, CA Lomita, CA Dan Plummer K. Kaultsman Isaac Yoshinaga Malibu, CA Torrance, CA Los Alamitos, CA

April Nuño Gary-James Gunnarson Matthew Strang Paramount, CA Long Beach, CA Newbury Park, CA Holly Nuño Sergio Platero Juan Soria Paramount, CA Santa Clarita, CA Long Beach, CA Clairissa Nuño Sally Sanchez Randolph Rodriguez Paramount, CA Long Beach, CA Sun Valley, CA Abraham Nuño Mike Habib Cece Rubin Paramount, CA Long Beach, CA Westlake Village, CA Tom Lindsey Fred Brooks Renton Fernando San Pedro, CA Long Beach, CA Westlake Village, CA Anthony Scogumallo Tomas Berrilia Terry Pyle San Pedro, CA Long Beach, CA Woodland Hills, CA Larry Wells Bobby Hayden Darryl Ty Seal Beach, CA Portland, OR Oak Park, CA Robert Levin Anrette Nonurma JR Oestuan Surfside, CA Pasadena, CA Castaic, CA Reginald Fagali Ryen Rodriguez Steven Field Sunland, CA Carson, CA Van Nuys, CA Annette Takashima LaJuan Hooper Gary Kishmoto Carson, CA Tujunga, CA Van Nuys, CA Renee Weiss Nancy Chu Christopher Osti Long Beach, CA Pasadena, CA Van Nuys, CA James Middleton Alice Hulac-Morentin Rooney Panossian Glendale, CA Van Nuys, CA Long Beach, CA Louise Luyun Gilbert Mallari Linoli Martin Long Beach, CA Canoga Park, CA Van Nuys, CA Dave Provence Charleston Daulo Matt Riston Van Nuys, CA Long Beach, CA Winnetka, CA Parriers Baldwin Greg Hoke Christopher Osti Chatsworth, CA Long Beach, CA Van Nuys, CA Gabriel Vierra Masashide Tale Chisselle Paterson Long Beach, CA Chatsworth, CA Van Nuys, CA Peter Chang Megan Richardson Dory Edson Long Beach, CA Newbury Park, CA Burbank, CA

Dawn Villarud Samantha Chang Danny Reves Rancho Cucamonga, CA Burbank, CA Vista, CA Jeff Garfield Tom Barrio Virgil Villarud Studio City, CA El Monte, CA Vista, CA Autumn Maggard Luis Cuevas Kenn China Studio City, CA Glendora, CA San Diego, CA Tommy Avila Philip Gavl Stacy Enns Azusa, CA Glendora, CA San Diego, CA Adelle Win Christopher Forbeck Kat Abelardo Glendora, CA Chino Hills, CA San Diego, CA Scott Harlan Fred Flores Odeth Tatton Chino, CA La Puente, CA Joshua Tree, CA Daniel Yamamoto Liz Moyer Victor Arwoli Chino, CA Rowland Heights, CA Adelanto, CA Frank DeAnda Wilma Medella Jesus Caw Chino, CA San Gabriel, CA Amboy, CA Corey Vantilburg Susan Perry Ray Alvarez Chino, CA Upland, CA Apple Valley, CA Chris Brown Chin Chong Tracy Tokunaga Upland, CA Big Bear Lake, CA Chino, CA Bob Brown Malcolm Shrover Yolanda Nava Chino, CA Chula Vista, CA Fontana, CA Tom Cramer Jacob Kilby Charlie Nona Covina, CA Jamul, CA Fontana, CA Timbo Jouesau Shane Borklund Michael Faraoni Fontana, CA Covina, CA Jamul, CA Joel Caleron John DeLaurentis Gilbih Chavez Rancho Cucamonga,CA Carlsbad, CA Hesperia, CA Tiffany Leszczynski John Villazonzola Michael Klippone Del Mar, CA Highland, CA Rancho Cucamonga,CA Maximus Reyes Dan Brown Stacy Manta Rancho Cucamonga,CA Escondido, CA Redlands, CA Jesse Perez Danna Moore Jay Vasquez Rancho Cucamonga,CA Oceanside, CA Redlands, CA

James Taylor Raylynn Losey **Edward Perez** San Bernardino, CA Sun City, CA Westminster, CA Betsy Sulas Pete Power Federic Doucedame San Bernardino, CA Irvine,CA Westminster, CA Jose Madrid Ryan Vain Gaby Martinez Riverside, CA Irvine,CA Santa Ana, CA Steven Moreno Wyatt Bresley James David Costa Mesa, CA Riverside, CA Santa Ana, CA Francine Hinostrom Cleros Flynn Ana Thompson Dana Point, CA Riverside, CA Santa Ana, CA Frank Orta Jane Wilson Britney Rosales Dana Point, CA Santa Ana, CA Riverside, CA Jordan Callahen Hilda Rosales Jonathan Waltiter Riverside, CA Lake Forest, CA Santa Ana, CA Melvin Tran Charlie Waltiter Roberto Paso Lee Riverside, CA Lake Forest, CA Santa Ana, CA Honey Bernas Jemian Luna Julia Chuc Riverside, CA Lake Forest, CA Santa Ana, CA Matthew Smith Richard Martinez **Britney Rosales** Santa Ana. CA Riverside, CA Lake Forest, CA Dan Greenwood Dee Smith Jim Derr Riverside, CA Huntington Beach, CA Tustin, CA Erika Walker Stacy Wood Jose Contreras Lake Elsinore, CA Huntington Beach, CA Anaheim, CA Dean Ristow Roger Anderson V Smith Moreno Valley, CA Newport Beach, CA Anaheim, CA Paul Paul Robert Chai Day Caffrey Moreno Valley, CA San Juan Capistrano, CA Anaheim, CA Rosalva Herber Suzanne Caffrey Mark Lopez Anaheim, CA Moreno Valley, CA San Juan Cap. CA Glen Chavez Gary Slater Tim Hugur San Jacinto, CA Trabuco Canyon, CA Anaheim, CA Mary Millar Gary Hooper Julie Velazquez Menifee, CA Westminster, CA Anaheim, CA

Bruce Snider Alexis Velazquez Shane Maver Anaheim, CA Moorpark, CA Big Creek, CA Lary Ostrosky Robert Schultz **Brent Weigandt** Anaheim, CA Fresno, CA Simi Valley, CA Diana Ostrosky Hardy Gunawan Cody Olsen Anaheim, CA Simi Valley, CA Fresno, CA Jim Hooper John Torres Blair Olsen Brea, CA Simi Valley, CA Fresno, CA Kristen Cruz Kary Torres Richard Jew Simi Valley, CA Fullerton, CA Daly City, CA Ian Douglas Jake Torres William Joe Fullerton, CA Simi Valley, CA San Francisco, CA Savannah Orange Rafael Molina Terry Otoshi Fullerton, CA Bakersfield, CA San Francisco, CA Veronica Figueroa Mike El Manari Sasha Sommer Orange, CA Avila Beach, CA San Francisco, CA James O'Donnell Angel Elazegui Fred Perry Orange, CA Lompoc, CA Santa Clara, CA Robert Elazegui Victoria Corr Tyler Thomas Orange, CA Copperopolis, CA Lompoc, CA Greg Shea Garry Conner Valerie Older Corona, CA Acton, CA Tracy, CA Robin Rush Nicki Enriquez Anthony Perez Yorba Linda, CA Carmichael, CA Lancaster, CA Cooper Matheson Glen Older Steve Caldwell Ventura, CA Mammoth Lakes, CA Mercer Island, WA Jel Older Marcia Caldwell Mike Reese Mammoth Lakes, CA Mercer Island, WA Ventura, CA Sandra Gamboa Lindsey Boyd David Lee Ventura, CA Palmdale, CA Mercer Island, WA Daniel Lopez Violet Gonzalez Cailin Caldwell Fillmore, CA Palmdale, CA Mercer Island, WA Mike Brien Steve Caldwell Marylou Auelbuta Fillmore, CA Tehachapi, CA Mercer Island, WA Marcia Caldwell Candace Wheeler Sonya Cov Milwaukie, OR Mercer Island, WA Portland, OR Richard Martinez Kathryn Wheeler Vanessa Hawk Tigard, OR Hillsboro, IA Gresham, OR Sally Homer Samuel Kille Laura Mayer Palatine, IL Washougal, WA Gresham, OR Leroy Brown Brad Hergert Ed Halev Coeur D Alene, ID Vancouver, WA Gresham, OR Rex Huang Cory Scott Kiley Heller Sandy, UT West Linn, OR Hillsboro, OR June Koch Tyler Ramey Amy Holt Las Vegas, NV Kelso, WA Woodland, WA Kevin Clark Zack Crafton Rodney Weigel Sherman Oaks, CA Portland, OR Vancouver, WA Nate Jones Patrick Hambleton Jessica Taylor Fountain Valley, CA Portland, OR Rock Springs, WY Sam Plane Robert Huber Randy Chatfield Beavercreek, OR Murrieta, CA Hillsboro, OR Dan Ramey Bob Burke Ruth Wood Vancouver, WA Molalla, OR Hillsboro, OR Eric Wright Marcia Burke Debbie Hebdon Portland, OR Hillsboro, OR Molalla, OR Mark Chow Steven Illman Misty Sayers Vancouver, WA Marcola, OR Berkeley, CA Aaron Eyler Jeff Messinger Teddy Peetz Vancouver, WA Vancouver, WA Milwaukie, OR Matt Grider Angel Baker Kathleen Bradley Vancouver, WA Milwaukie, OR Rhododendron, OR Robert Chivino Kevin Marple Adam Wright Vancouver, WA Troutdale, OR Sherwood, OR Anne Marple Mike Crane Staci Pace Vancouver, WA Sherwood, OR Gresham, OR Scott Moss Edmond Keene Sandy Wright Tigard, OR Banks, OR Troutdale, OR

Patrick Henderson	Steve Reed	Randy Mildenberger
Portland, OR	Milwaukie, OR	Portland, OR
Christopher Funk	Jerry Kneppers	William Blake
Vancouver, WA	Vancouver, WA	Portland, OR
Jack Whitney	Jacqueline Smith	Robert Kirschner
Brush Prairie, WA	Estacada, OR	Portland, OR
Tom Berg	Michael Whitten	Michael Crupper
Damascus, OR	Estacada, OR	Portland, OR
Theresa Shaw	Zachary Ek	David Olsen
Portland, OR	Woodland, WA	Clatskanie, OR
Albert Greenwood	Marin Mirich	James Jevnstedt
West Linn, OR	Portland, OR	Gresham, OR
Rick Robinson	Austin Schoenborn	Kipp Susick
Lake Oswego, OR	Woodland, OR	Vancouver, WA
Virgil Wilbur	Wade Schoenborn	John Klochak
Auburn, WA	Woodland, OR	Davenport, CA
Donald Janiqian	Jess Rickman	Douglas Stewart
Battle Ground, WA	Molalla, OR	Portland, OR
Harold Adams	Percy Traill	Jenifer Denton
Kennewick, WA	Tigard, OR	Gresham, OR
Steve Hatfield	Jim Allen	Michael Dribin
Aurora, OR	Molalla, OR	Woodland, WA
Patrick Hatfield	Evan Crompton	Dhana Gunter
Gervais, OR	Gresham, OR	Woodland, WA
Elizabeth McCulley	John Downing	Rick Dahlstrum
Vancouver, WA	Vancouver, WA	Ridgefield, WA
Martin Butler	Todd Brooks	Ernest Zseleczky
Salem, OR	Lake Oswego, OR	Portland, OR
Frank Carrillo	Chenie Reins	Richard Duncan
Hillsboro, OR	Battle Ground, WA	Lake Oswego, OR
Jason Leonard	Jody Stables	John Holt
Vancouver, WA	Clackamas, OR	Portland, OR
Thomas Zitzwitz	Amanda Chrusoskie	Joe Keelong
Vancouver, WA	Molalla, OR	Beaverton, OR

Robert Jauron John Tate Dean Muchow Portland, OR Tigard, OR Gladstone, OR David Pflugrad Brevin Leslie Joseph Schoonover Hillsboro, OR Centralia, WA Lake Oswego, OR Richard Settje **Edward Puls** Tyler Jaskowiak Washougal, WA Clatskanie, OR Gresham, OR Richard Bolm Charles Johnson Peggy Macko Portland, OR Ridgefield, WA Clatskanie, OR Ron Yow Eric Jans Lucas Gregory Vancouver, WA Sandy, OR Portland, OR Matt Jues Nick Conley Brian McLaren Bend, OR La Pine, OR Portland, OR Stella Butler Adriene Cruz Cesar Esparza Olympia, WA Beaverton, OR Troutdale, OR Jonas Jones Mason Brock Allen Butler Snohomish, WA Portland, OR Gresham, OR Belhay Wyatt David Illiq Dagmar Friedrich Vancouver, WA Portland, OR Dallas, OR Colby Brown John Thompson Linda Hollingshead Roy, WA Hillsboro, OR Canby, OR Abigail Fordice Jana Nelson Doug Moore Tigard, OR Milwaukie, OR Hillsboro, OR Rikki Velasco Brooks Green Doug Cassidy Sandy, OR Vancouver, WA Portland, OR Jordan Flemming Carissa Campbell Nick Giusti Hillsboro, OR Amboy, WA Vancouver, WA Neil O'Connor Catherine Smith Jace Kincaid Seaside, OR Silverton, OR Milwaukie, OR Brian West Diane Loop Laroy Smith Corvallis, OR Seaside, OR Beaverton, OR Joane Smith Lindy Nelson John Kopacek Canby, OR Prineville, OR Tualatin, OR Vince Archibald Neil Hieronymus Kerry Bell Vancouver, WA Auburn, WA Scappoose, OR

Khoriev Smith Jackie Nash Jay Nahumy Portland, OR Bay City, OR Bend, OR Lydia Miller Derek MacDickeN Duc Huynh Monmouth, OR Portland, OR Portland, OR Jason Miller Janelle Wilson Patty Jo Curler Battle Ground, WA Chehalis, WA Portland, OR Joshua Beebe Bryan Hutchison David Gassman Battle Ground, WA Scappoose, OR Milwaukie, OR Sarah Robinson Randy Newton Pauli McQuan Beaverton, OR Battle Ground, WA Portland, OR Dave Maroon Rebecca Leib John Montgomery Gresham, OR Corvallis, OR Portland, OR Kare Vasanth Kyle Dooney Karyn Smith Rainer, OR Canby, OR Portland, OR Brian Lee Salyers Vonnie Roquemore Brendan Donovan Beaverton, OR Eagle Point, OR Portland, OR Nichole Kirby David Horton Kellen Donovan Toledo, WA Wilsonville, OR Portland, OR Trevor Donovan Dave Messinger Dana Lundell Newberg, OR Lake Oswego, OR Portland, OR Megan Bibile Mike Larkin Steve Donovan Oregon City, OR Portland, OR Gaston, OR Alina Bibile Alison Harding Jacob Pimley Portland, OR Gresham, OR Portland, OR Robin Harrison Chad Acheson CW Taylor Woodland, WA Portland, OR Tigard, OR Mary Pat Sabde Cynthia Christensen R Ruffo Tigard, OR McMinnville, OR Portland, OR Jenelle Lemonds Tracy Johnson Matt Earley Lebanon, OR Salem, OR Toutle, WA Angelica Jordan Harlan Grimwood Kirsten Fulk West Linn, OR Portland, OR Sweet Home, OR Carol Clark Jon Nash Gordon Gentry Bend, OR Beavercreek, OR Dallas, OR

Adam Odem Dan Laizure Ashley Subers Walla Walla, WA Sherwood, OR Longview, WA Donna Laizure Chet Trapp Aaron Odem Walla Walla, WA Tualatin, OR Kalama, WA Vonda Van Liver Luke Krebs Mackenzie Maxwell Vancouver, WA West Linn, OR Camas, WA Xander Gyllenskog Loralee Hopper James Maxwell Monmouth, OR Newberg, OR Camas. WA Dave Schmidt Rich Hopper Julie Bensar Cornelius, OR Newberg, OR Yamhill, OR Brenda Muchow Angela Phillips William Hutchison Gladstone, OR The Dalles, OR Scappoose, OR Michael Myrick Jeffrey Hamilton Tory Hutchison Portland, OR Banks, OR Portland, OR Mary Kennison Gage Prince Hilary Mantz Winlock, WA Beaverton, OR Scotts Mills, OR Isabella Prince Cody Chapman Regina Noxon Woodland, WA Lake Oswego, OR Winlock, WA Scott Prince Karson Paris Jessica Inman Winlock, WA Los Angeles, CA Oregon City, OR Alexis Phillips Paula Johnson Nianna Denton The Dalles, OR Adel, OR Dallas, OR Jaes Cathcart Roger Shaw Stacy Edwards Vancouver, WA Salem, OR Portland, OR Secret Yanez Carrie Miyake Shawna Fair Castle Rock, WA Vancouver, WA Springfield, OR Kevin McLaughlin Keagan Vinyard Haley DeRocher Portland, OR Longview, WA Yacolt, WA Amanda Gavin Gary Hedges Jason Vinyard Long Beach, WA Longview, WA Vancouver, WA Jade Laselle Sandra Byers Tamara Hermanson Centerville, WA Longview, WA Yacolt, WA Aaron Yanez Heidi Leslie Kyra Erickson Washougal, WA Castle Rock, WA Beaverton, OR

Melissa Remillard Hillsboro, OR	William Kremers Corvallis, OR	Thomas Goodwin Merlin, OR
Kyla Somerville Keizer, OR	Grant Zadow Tualatin, OR	Christian Ewing Oregon City, OR
Benjamin Ewing		Harry Rectenwald
Oregon City, OR	Patrick Tsukuda Portland, OR	Lake Oswego, OR
Jim Anderson	•	Susan Rectenwald
Oregon City, OR	Rocco Jaconis Portland, OR	Lake Oswego, OR
David Jiwings	•	Mark Rogers
Portland, OR	Thomas Horning Gresham, OR	Sandy, OR
Traci Johns	,	Dennis Cone
Stayton, OR	Richard Hollenbeck Portland, OR	West Linn, OR
Dennis Reeves		Joe Engler
Milwaukie, OR	Terry Turner Gladstone, OR	Sandy, OR
Juan Calvillo		Thomas Dufala
Oak Grove, OR	Justin Boucher Portland, OR	Boring, OR
Ernest Tsukuda		Alex Salazar
Portland, OR	Clarence Bergevin Eagle Creek, OR	Oak Grove, OR
Ruth Ann Tsukuda	-	

Portland, OR



March 16, 2017

Mr. Herb Pollard, Chair Pacific Fishery Management Council 7700 NE Ambassador Place, Suite 101 Portland, OR 97220-1384

RE: Agenda Item G.2: Central Subpopulation of Northern Anchovy OFL Process

Dear Chair Pollard and Council Members,

As of the April 2017 Advanced Briefing Book Deadline of March 16, the Pew Charitable Trusts can confirm 12,370 email comments from ocean advocates across the country who support the development and adoption of updated management measures for northern anchovy.

The petition language is included here. For the Supplemental Briefing Book deadline we will provide a similar compilation of all of additional the names, cities, states, and any personal comments of individual signers. This will be submitted to the Council as of the morning of March 30, 2017.

Thank you for your time and consideration. We appreciate the opportunity to work with you to maintain sustainable fisheries and healthy ocean ecosystems.

Bobby Hayden

RIMAL

Senior Associate, U.S. Oceans, Pacific

The Pew Charitable Trusts

rhayden@pewtrusts.org

Mr. Herb Pollard, Chair Pacific Fishery Management Council 7700 NE Ambassador Place, Suite 101 Portland, OR 97220

Dear Chair Herb Pollard and Pacific Fishery Management Council members:

I am writing to ask the Council to adopt management measures, based on the best available science, that protect northern anchovies' crucial role in the Pacific Ocean food web. In particular, I ask that you establish new catch limits in response to recent information about the status of the stock. This effort can ensure adequate prey for dependent predators, prevent overfishing, and support strong coastal communities.

Northern anchovies are among the most important forage fish in the California Current ecosystem, but existing management of the stock is based on decades-old information. These fish are a critical food source for salmon, tuna, brown pelicans, sea lions, humpback whales, and dozens of other marine species. In light of new scientific studies showing that anchovies are now at very low numbers and that predators may be bearing the brunt of these declines, I encourage you to act.

Sincerely,

A full list of names, cities, states and any additional personal comments will be submitted to the April 2017 Supplemental Briefing Book Deadline.

Following are a few examples of of the 12,370 emails received on this agenda item

#### Dear Chair Pollard and Council Members:

\*\*\*These fish are the core of the mid-trophic level of the Pacific ecosystem. This vital functional component appears to have been burdened with an unacceptably high catch limit, and has been deplete to an unacceptably low level, depriving wildlife of the food to which they are rightfully entitled and which has sustained them for eons. The PFMC must adopt a catch limit that confines the human privileges to the Northern Anchovies to a level that does not injure the senior and superior rights of predator species to enjoy this resource, as they have for eons before humans set foot or boat on the Pacific Coast. They must not be consigned to whatever scraps of Anchovy populations remain after humans have satiated their appetite for cheap proteins and lipids.\*\*\*

I am writing to ask the Council to adopt management measures, based on the best available science, that protect northern anchovies' crucial role in the Pacific Ocean food web. In particular, I ask that you establish new catch limits in response to recent information about the status of the stock. This effort can ensure adequate prey for dependent predators, prevent overfishing, and support strong coastal communities.

Northern anchovies are among the most important forage fish in the California Current ecosystem, but existing management of the stock is based on decades-old information. These fish are a critical food source for salmon, tuna, brown pelicans, sea lions, humpback whales, and dozens of other marine species. In light of new scientific studies showing that anchovies are now at very low numbers and that predators may be bearing the brunt of these declines, I encourage you to act.

Sincerely, Jim Steitz Gatlinburg, TN

Date: Sat, Mar 18, 2017 at 1:58 PM

Subject: HUMANS REVOLT AGAINST ALIENS FRO.M HYPERSPACE

To: pfmc.comments@noaa.gov

#### Dear Chair Pollard and Council Members:

I am writing to ask the Council to adopt management measures, based on the best available science, that protect northern anchovies' crucial role in the Pacific Ocean food web. In particular, I ask that you establish new catch limits in response to recent information about the status of the stock. This effort can ensure adequate prey for dependent predators, prevent overfishing, and support strong coastal communities.

Northern anchovies are among the most important forage fish in the California Current ecosystem, but existing management of the stock is based on decades-old information. These fish are a critical food source for salmon, tuna, brown pelicans, sea lions, humpback whales, and dozens of other marine species. In light of new scientific studies showing that anchovies are now at very low numbers and that predators may be bearing the brunt of these declines, I encourage you to act.

Sincerely, Alba Morillo Gresham, OR

Date: Thu, Mar 16, 2017 at 12:45 PM

Subject: Protect Anchovies
To: pfmc.comments@noaa.gov

Dear Chair Pollard and Council Members:

Please adopt management measures that protect northern anchovies' crucial role in the Pacific Ocean food web.

In particular, I ask that you establish new catch limits in response to recent information about the status of the stock. This effort can ensure adequate prey for dependent predators, prevent over fishing, and support strong coastal communities.

Thank you.

Sincerely, Henry Frank Philadelphia, PA

Date: Mon, Mar 13, 2017 at 11:44 AM

Subject: Northern Anchovies To: pfmc.comments@noaa.gov

## Dear Chair Pollard and Council Members:

I am aware that Northern anchovies are among the most important forage fish in the California Current ecosystem, and serve as a critical food source for salmon, tuna, brown pelicans, sea lions, humpback whales, and dozens of other marine species. I also am aware that anchovies are now at very low numbers; therefore I ask you to please direct the PFMC to break away from the existing anchovy management plan and adopt management measures that are designed to protect northern anchovies. Thank you.

Linn Barrett, Greeley, CO

Dear Pacific Fishery Management Council:

California sea lion pups have been found stranded on beaches during spring months in recent years. Many died and many others were found underweight, dehydrated, and starving. Their mothers were not finding enough forage fish to eat. They were spending more time away from their pups foraging, farther from shore, and the nursing sea lion pups were in turn, starving to death.

Approximately three times as many sea lions washed ashore in 2015 compared to 2013, when the severity of strandings emerged as an issue of great concern. About 90 percent of sea lion pups were estimated to have died last year before reaching weaning age.

More must be done to ensure there is adequate forage fish to support a healthy and abundant food web in the Pacific Ocean.

I am greatly concerned that management of the commercial forage fish fisheries off California, Oregon and Washington is leaving ocean wildlife without enough fish to eat. Sea lions, whales, pelicans, and many other species rely on these same forage fish for a large part of their diet. Pacific sardine and Northern anchovy populations are at historically low levels and are some of the most important forage fish in the California Current ocean ecosystem. Immediate, lasting action is needed to prevent future overfishing and to help these forage fish populations rebuild to healthy and abundant levels.

I urge you to take immediate measures to fix the Pacific sardine management framework, prevent Northern anchovy overfishing, and ensure abundant forage fish populations for dependent predators. Ocean wildlife and coastal communities don't have time to wait.

Thank you for your time and consideration,

Caleb Laieski