



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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May 8, 2018

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

RE: Agenda Item F.1 Live Bait Fishery Allowance Scoping

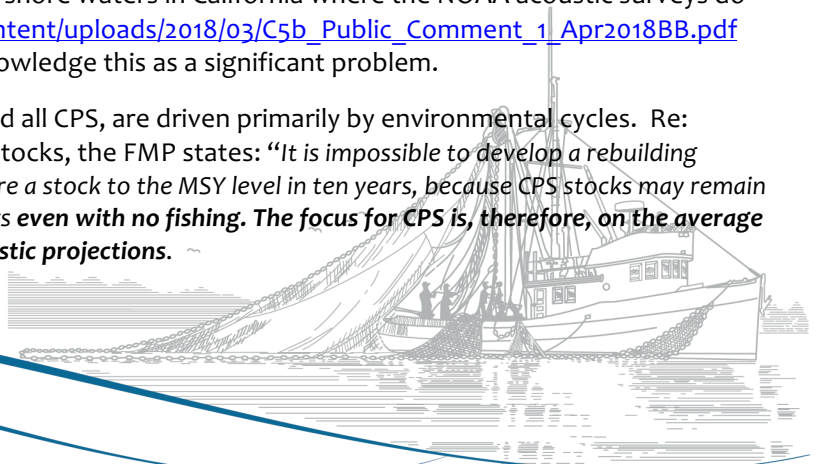
Dear Mr. Anderson and Council Members,

As Executive Director of the California Wetfish Producers Association (CWPA), I represent the majority of coastal pelagic species 'wetfish' fishermen and processors in California. Sardine has been the foundation of this industry for more than a century. Sardine is also essential to sustain California's recreational fisheries that rely on sardine for live bait.

At its April meeting, the Council received an update sardine stock assessment of only 52,065 mt, perilously close to the 50,000 mt minimum stock size threshold that would classify the stock as "overfished". Under current policy this would curtail virtually all sardine fishing. Such a calamity would precipitate enormous socio-economic impacts both to our historic wetfish industry in California and to recreational fisheries that rely on sardine for live bait. To address this issue, the Council tasked the CPS Management Team to review current "overfished" policy, with special attention to live bait, and to develop a scoping document addressing the purpose and need to revise the live bait fishery allowance under such conditions.

Before discussing our specific thoughts and recommendations on this issue, I would appreciate the Council's consideration of the following overarching points:

- Foremost is our grave concern with the stock assessment itself. The elephantine problem with this update assessment is that it belies reality, as I noted in our April Briefing Book comments. Fishermen are seeing more sardines, not less, especially in nearshore waters in California where the NOAA acoustic surveys do not go. https://www.pcouncil.org/wpcontent/uploads/2018/03/C5b_Public_Comment_1_Apr2018BB.pdf The SWFSC leadership and SSC now acknowledge this as a significant problem.
- The CPS FMP itself notes that sardines, and all CPS, are driven primarily by environmental cycles. Re: rebuilding programs for overfished CPS stocks, the FMP states: ***"It is impossible to develop a rebuilding program that would be guaranteed to restore a stock to the MSY level in ten years, because CPS stocks may remain at low biomass levels for more than ten years even with no fishing. The focus for CPS is, therefore, on the average or expected time to recovery based on realistic projections."***



- Please remember the words of Assistant Administrator for Fisheries Chris Oliver, who addressed the Council at the April meeting to highlight NOAA Fishery Priorities in 2018. We were pleased to hear him speak about sustaining fishing communities as well as resources. Of special relevance was his comment regarding the need to combine scientific underpinning with practicality and common sense.

On May 8, I tuned in to the CPS Management Team webinar to hear discussion of the proposed Purpose and Need Statement for this agenda item. The CPSMT focused on the need to give the Council greater flexibility in developing rebuilding plans for all CPS, including live bait, because the current prescribed incidental allowances in Chapter 5 of the FMP limit the ability of the Council to determine on a case-by-case basis the appropriate catch levels that will reduce mortality and discard potential while still allowing for continued prosecution of other CPS fisheries.

We support this broader approach, as it fits both the FMP's theme of "**recovery based on realistic projections**" and the practicality and common-sense highlighted by A.A. Chris Oliver and 2018 NOAA Fishery Priorities.

Pertaining specifically to the live bait fishery, it is important to acknowledge three facts:

- A growing body of independent science supports the finding that CPS abundance is driven primarily by environmental forcing with negligible impact from fishing, especially at the precautionary rates mandated in the CPS FMP.
- California's recreational fishery contributes tremendous socio-economic benefits to the state. According to NOAA statistics, in 2015, marine recreational anglers spent \$1.5 billion on fishing activities, adding an additional \$1.3 billion of economic value and support of approximately 16,000 full and part-time jobs.
- The live bait fishery represents the highest-value use of the sardine resource on the west coast, catches are small, and more than 90 percent of the live bait 'borrowed' from the ocean is returned alive.

In light of the value of this fishery to California, and considering the very small biological impact to the resource, we suggest the Council consider exempting live bait from restrictions altogether, and support the recommendation for flexibility in setting incidental take provisions for all CPS.

I appreciate your consideration of our concerns and recommendations, both for increasing flexibility and utilizing best available common sense in developing rebuilding programs for all CPS, if necessary, and for exempting the live bait fishery for sardine, in light of the reasons that I've expressed above.

We look forward to providing further comments and recommendations after reviewing the full CPSMT scoping document.

Thank you.

Best regards,



Diane Pleschner-Steele
Executive Director