

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL
REPORT ON CLIMATE AND COMMUNITIES INITIATIVE

The Coastal Pelagic Species Advisory Subpanel (CPSAS) reviewed the Ecosystem Workgroup (EWG) Report 1 on the Climate and Communities Initiative (Agenda Item G.3.a) and related questions. Members of the CPSAS also read the Climate and Communities Initiative Workshop Report submitted by The Nature Conservancy (TNC) (G.3 Attachment 1). We would appreciate the Council's consideration of the following concerns and comments.

We noted that many of the tools suggested in the Climate & Communities Initiative and TNC Report essentially propose to reconsider the regulations that created restricted (e.g. Limited Entry) access fisheries in order to provide more opportunity for open access. Yet this is proposed alongside proposals to "Reduce maximum sustained yields to create an uncertainty or variability buffer" to address the vagaries of climate change. This is contradictory to achievement of economic sustainability. This is concerning to fishermen who have invested millions of dollars to participate in limited entry fisheries. We point out that fisheries access was restricted for a purpose: to prevent overexploitation of fish stocks and provide for the economic stability of the entire fishing industry. These limited entry fisheries, such as the CPS fisheries, are the foundation of many harbor communities. Undermining the current restricted access policies would create economic instability and chaos. We strongly disagree with this approach.

Another oxymoron is the call for flexibility to mitigate the potential northward shift of fishery stocks. Warming in the southern part of the California Current is likely to greatly increase the abundance of pelagic species as well as tropical anchovies, herrings, and other fish. However, the first ecosystem initiative completed by the Council (CEBA1) prohibits fishing for currently unmanaged forage fish, including round herring (a species that appeared in Southern California during the 2015 El Niño, around the same time the Council was approving CEBA1). The third ecosystem initiative proposes to include ways to improve flexibility and responsiveness to the climate changes we are experiencing, but there is no discussion of or planning for the likely expansion of tropical species into California. It is apparent that the first ecosystem initiative is incompatible with the third ecosystem initiative.

We support the need for flexibility: streamlining the exempted fishing permit (EFP) process, as well as the Terms of Reference to conduct the research required to open a new fishery, are both important goals. We point out that if the goal is to achieve "ecosystem optimum yield", it will be important to update the Council's understanding of protected species to account for the sharp increase in marine mammal populations over the past decades, and the mortality impacts of their predation rates. The take of the key forage species by the U.S. fishery is only 2 percent of that taken by fishes, mammals and birds. (R. Parrish, Agenda Item G.2.b, September 2018). Current ecosystem modeling suggests that harvest guidelines for small pelagic fishes could be doubled with minimal harm to ecosystem function. (Olsen et al 2018).

Ultimately, the Council needs to be able to adapt the regulatory process quickly to meet the needs of the fishing communities as the impacts of climate change impact our fisheries. Presently, the Council process does not have the flexibility to meet these challenges. Increased collaboration between federal agencies would help expedite the decision process, but in many cases the prevailing statutes and regulations will need to be changed.

Magnuson-Stevens Act National Standard 1 mandated striking a balance between protection and optimum yield, but in recent years, overly cautious management has negatively impacted CPS fisheries. While discussing how to adapt to a changing climate is desirable, we also need to recognize that we don't understand the full extent of changes the ocean will experience in the coming decades, so while 'scenario planning' may be an interesting exercise, what the Council needs is an execution strategy as well as a rapid-response process to adapt swiftly at the appropriate time.

We also recommend that the Council:

- Understand and acknowledge the continuing importance of CPS fisheries to fishing communities.
- Support policies that encourage and incentivize reducing the CO₂ footprint in fisheries.
- Support collaborative research, involving fishermen, to improve understanding of ocean resources and potential climate change impacts on fisheries.
- Operate under the principle that any response to climate change must not undermine the goals and objectives inherent in existing limited entry programs.
- If the Council decides to go forward with "scenario planning," we suggest that the first focus be on species likely to be most vulnerable initially, (e.g. anadromous or rockfish species, according to the California Current Fish Vulnerability Assessment, Agenda Item I.1.a, September 2017).

Thank you for your consideration of these comments.

PFMC
09/07/18