



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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September 6, 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 G.3 Climate and Communities Initiative

Dear Mr. Anderson and Council Members,

As Executive Director of the California Wetfish Producers Association (CWPA), I represent the majority of coastal pelagic species (CPS) 'wetfish' fishermen and processors in California. For many decades, until recent years, California's wetfish industry produced on average 80 percent of the volume and as much as 40 percent of dockside value of total commercial fishery landings in the Golden State. California's CPS 'wetfish' fisheries also are among the 'greenest', most fuel-efficient fisheries in the world: our purse seine fleet is capable of producing one metric ton of protein for an average six gallons of fossil fuel (R. Parrish, *Fishing Green*, 2013).

California's CPS fisheries are still essential to California's fishing economy. As you deliberate on the issues of climate change, we ask the Council to consider the importance of these fisheries to the many harbor communities they serve. With that preamble, we would appreciate your consideration of the following comments.

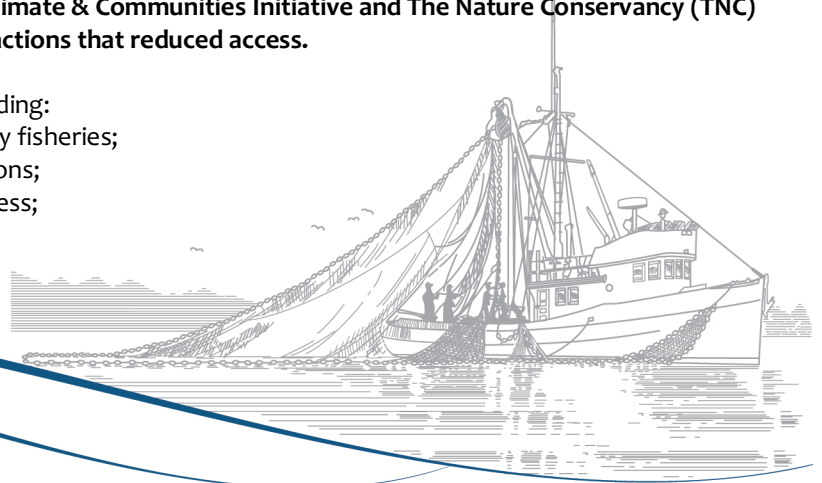
Over the last several decades the Council and States have greatly reduced access to the fishery resources of the California Current. For example:

- Limited entry by species or species groups.
- Prohibiting all fishing on species not presently fished (CEBA1).
- Establishment of marine protected areas (MPAs) and essential fishery habitat (EFH) closures.
- Establishment of annual harvest limits:
- Establishment of annual catch limits (ACLs) for all species

However, the majority of the tools suggested in the Climate & Communities Initiative and The Nature Conservancy (TNC) Report propose essentially to reverse the regulatory actions that reduced access.

Page 6 of the TNC report lists potential solutions, including:

- Address the reduced flexibility of limited entry fisheries;
- Streamline and enhance flexibility of regulations;
- Ease the regulatory path to new fisheries access;
- Maintain/offer open access fisheries;



- Lessen the spottiness of fishery openings and closures
- Facilitate group coordination (e.g., community cooperatives) and co-management
- Implement regulatory mechanisms using scenario planning
- Establish mutually agreed upon criteria to use community set-asides
- Fast-track/streamline the Exempted Fishing Permit (EFP) process

The Initiative ignores the fact that it recommends increasing access to fisheries at the same time it recommends reducing yields. That is, tools that would be used to increase access to fishery resources are proposed to be used along with a significant reduction in fishery yields resulting from their recommendation to “Reduce maximum sustained yields to create an uncertainty or variability buffer”.

That apparent contradiction begs the question: What about the existing limited entry fisheries? What about us?

In arguments supporting the need for flexibility, nowhere is there any discussion of or planning for the likely expansion of tropical species into California. Presently there are number of large pelagic fishes that seasonally migrate into Southern California. Warming in the southern part of the California Current is likely to greatly increase the abundance of these species as well as tropical anchovies, herrings, jacks and bottom fishes.

The first ecosystem initiative (CEBA1) completed by the Council was to prohibit 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 implementing CEBA1). Now the third ecosystem initiative proposes to include ways to improve flexibility and responsiveness to the climate changes we are experiencing. **It must be apparent that the first ecosystem initiative is incompatible with the third ecosystem initiative.** Prohibiting the take of subtropical, now largely unfished, species while at the same time proposing increased flexibility and responsiveness to climatic changes is oxymoronic.

We support the need for flexibility, depending on how it is defined. Streamlining the EFP process, and the research required to open new fisheries, is a good thing. So is providing flexibility in the Terms of Reference for stock assessments, enabling consideration of ‘on-the-ground’ evidence that may contradict model outcomes based on incomplete data. But we also believe that fishery management should be focused primarily on longer-term goals, rather than on attempting quick response to unusual events associated with short term environmental fluctuations that affect only a few species. The anchovy brouhaha is case in point. The large increase in California sea lion strandings in 2015 precipitated calls from some environmental groups to curtail California’s small anchovy fishery. “Quick” action, following the Council process, would have closed the fishery just in time for the strandings to fall **below** the longer term mean in 2017.

Several scientific papers now acknowledge that sea lions are at or may have surpassed carrying capacity, and Unusual Mortality Events are the expected symptoms of a population of animals near carrying capacity: symptoms include reduced reproductive output, decreased growth and survival of young animals, delayed sexual maturity, increases in disease or parasites and decreased size and survival of adults.

The ocean is a dynamic place, and it will become more extreme in coming decades and centuries in ways that we cannot predict now (especially if society continues its Business As Usual habits). However, ecosystem modeling exercises, such as the California Current Fish Climate Vulnerability Assessment (Agenda Item I.1.a, September 2017) are beginning to identify the most vulnerable species (thankfully not CPS). We suggest that if the Council decides to pursue “scenario planning,” they focus first on the fisheries, and communities, that may be impacted first. The current thinking is that impacts from ocean acidification will be felt more strongly in the northwest and Alaska, at least initially. Perhaps communities where salmon and Dungeness crab are critically important might be good candidates for initial scenario planning.

We also note that **if** the ultimate goal is to achieve “ecosystem optimum yield”, it will be important to update the Council’s understanding of protected species vs. forage fisheries to account for the sharp increase in marine mammal populations over the past decades, and their predation on the forage base. For example, **the original California sea lion surveys in 1927-30 show that the population size of the California portion of the California sea lion population was about 2,800, and the most recent estimate is 340,000. The 2014 California population estimate is more than 120 times larger than the 1928 estimate.**

The take of the key forage species by the U.S. fishery is 2.0% of that taken by the fishes, mammals and birds. Dr. Richard Parrish submitted two Briefing Book statements for Agenda Items G.1, the NOAA EBM Road Map Implementation Plan, and G.2, the FEP Five Year Review. As he pointed out in his G.1 comments:

“it is apparent that during the present environmental regime, competition between protected species is far more important than competition between protected species and the U.S. fishery for forage fishes. The present management regulations have resulted in minimal landings. According to the 2018 assessment, west coast sardine landings were 524.3 mt and the California landings⁵ of northern anchovy were 5,408.8 mt in 2017. These landings are only 0.07% of the total annual take of the key forage fishes by fishes, mammals and birds (8,596, 606 mt : Table 1 in Parrish⁷)”

In summary, we recommend that the Council consider the following:

- Understand and acknowledge the continuing importance of CPS fisheries in California, and the need to incorporate the nearshore in future stock assessments to fully assess west coast CPS resources
- Support policies that encourage and incentivize reducing the CO₂ footprint in fisheries, and recognize California’s CPS fisheries as among the most efficient in the world
- Support collaborative research, involving fishermen, to improve understanding of ocean resources and potential climate change impacts on fisheries.
- In efforts to achieve flexibility, please do not undermine the existing limited entry fisheries, i.e. wetfish, which contribute substantially to California’s fishing economy
- To truly understand ecosystem-based management (EBM), please update Council understanding of forage fisheries vs. protected predator species.
CPS abundance is driven by environmental variability, with minimal impact from our wetfish fisheries

This bears repeating in an EBM context: ***“it is apparent that during the present environmental regime in the CCS, competition between protected species is far more important than competition between protected species and the U.S. fishery for forage fishes***

o References: Hilborn et al 2017, McClatchie et al 2018, Olsen et al 2018 and many others.

- If the Council decides to go ahead with “scenario planning,” we suggest that you focus first efforts on the species likely to be most impacted initially.

Thank you very much for your consideration of our concerns and comments.

Best regards,



Diane Pleschner-Steele
Executive Director