



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Ecological Services
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IN REPLY REFER TO:
08EVEN00-2019-CPA-0057

April 1, 2019

Phil Anderson, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, Oregon 97220

Subject: Agenda Item E.4—Central Subpopulation of Northern Anchovy Management Update

Dear Mr. Anderson and Council Members:

The U.S. Fish and Wildlife Service (USFWS) appreciates the efforts of the Pacific Fishery Management Council (Council) to improve assessment and management of coastal pelagic species. In previous communications we informed the Council about the mortality events and poor breeding success at southern California colonies that California brown pelicans (*Pelecanus occidentalis californicus*) began to experience in the winter of 2008-2009 and the subsequent improvements in these metrics beginning in 2016 (USFWS 2015, USFWS 2016, USFWS 2017, USFWS 2018). Breeding success at these colonies has continued to improve, with final results for the 2017 breeding season indicating that the total number of California brown pelican chicks fledged from Anacapa Island and Santa Barbara Island was among the highest documented at the southern California islands (Parker et al. 2018). The timing of these changes closely tracks indices of the decline and resurgence of northern anchovy (*Engraulis mordax*) in the California Current Ecosystem (Thompson et al. 2018), illustrating the importance of northern anchovies as a forage fish for California brown pelicans. Recent increases in northern anchovy abundance are also apparently reflected in increased California sea lion (*Zalophus californianus*) pup production and survival and increases in common murre (*Uria aalge*) and rhinoceros auklet (*Cerorhinca monocerata*) productivity (Thompson et al. 2018, Coletta et al. 2018). Because of the significance of northern anchovy to these and other marine predators in the California Current Ecosystem (Anderson et al. 1982, Ainley et al. 2014, Szoboszlai et al. 2015, Koehn et al. 2016), and in light of the extreme fluctuations in biomass that are characteristic of coastal pelagic species, we reiterate our belief that regular assessments and reviews of harvest management specifications are necessary to ensure that the objectives of the Magnuson-Stevens Fishery Management and Conservation Act and the goal of the Coastal Pelagic Species Fishery Management Plan to “provide adequate forage for dependent species” (PFMC 2016) are being met.

Our comments concern E.4—Central Subpopulation of Northern Anchovy Management Update. We recognize the substantial effort that the Council and the Southwest Fisheries Science Center have expended to identify options and methods to update the reference points for the central subpopulation of northern anchovy (CSNA). Given that the Council expects to receive a description of methods to estimate the nearshore component of the stock, which can be used to adjust the biomass estimate based on Acoustic-Trawl Methodology survey data, it appears that adequate information is now available to proceed with near-term establishment of an updated overfishing limit (OFL), acceptable biological catch (ABC), and annual catch limit (ACL). The Scientific and Statistical Committee report (Agenda Item E.4, Attachment 2) states that “a near-term value for the OFL [and hence ABC/ACL] could be updated by conducting a new stock assessment *or when a new acoustic estimate of biomass or a DEPM estimate of spawning biomass become available*” (emphasis added). We note that the Court Order to Enforce Judgment (Agenda Item E.5, Attachment 1) and Court Order on Schedule (Agenda Item E.5, Attachment 2) in *Oceana, Inc. v. Ross et al.* significantly constrain the timeline in which the National Marine Fisheries Service must set new reference points, with a proposed rule due by April 5, 2019, and a final rule due by May 28, 2019. We therefore recommend that the Council immediately initiate a process to change CSNA reference points while longer-term efforts—such as a full management strategy evaluation and integrated stock assessment—are pending.

We thank the Council for its commitment to ecosystem-based management of fisheries. If you have questions regarding this letter, please feel free to contact Lilian Carswell, of my staff, at (805) 677-3325 or by electronic mail at Lilian_Carswell@fws.gov.

Sincerely,



Stephen P. Henry
Field Supervisor

Literature Cited

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