

PACIFIC FISHERY MANAGEMENT COUNCIL COMMENTS ON  
PROPOSED RULE TO ESTABLISHED OVERFISHING LIMIT, ACCEPTABLE  
BIOLOGICAL CATCH, AND ANNUAL CATCH LIMITS FOR CENTRAL  
SUBPOPULATION OF NORTHERN ANCHOVY

The Pacific Fishery Management Council (Council) reviewed the National Marine Fisheries Service's (NMFS's) proposed rule to revise the reference points for the central subpopulation for northern anchovy (CSNA), and provides the following comments.

The Council's opportunity for scientific review of the methodology used to derive the proposed overfishing limit (OFL), acceptable biological catch (ABC), and annual catch limit (ACL) was very limited because the proposed rule only became available a few days prior to the Council's April meeting. However, the Council's Scientific and Statistical Review Committee (SSC), Coastal Pelagic Species Management Team (CPSMT), and Coastal Pelagic Species Advisory Subpanel (CPSAS) were able to provide limited review and advice to the Council.

The Council considers the proposed rule a viable replacement to the vacated OFL, ABC, and ACL, and supports these new reference points as a reasonable approach to manage CSNA at this time. The Council also agrees that the proposed rule describes a reasonable approach to establishing these reference points, and believes the CSNA reference points may be updated, if necessary, as new scientific information becomes available.

To that end, under Agenda Item E.4, CSNA Update in April, 2019, the Council took action to consider methods for updating CSNA reference points. The Council directed the CPSMT, CPSAS, and the SSC Coastal Pelagic Species Subcommittee to work with the Southwest Fisheries Science Center (SWFSC) to address specific outstanding questions and issues relative to CSNA reference points. Specifically, the group was tasked to determine the nearshore estimation methodologies necessary to complement the acoustic trawl survey, review a recent [analysis](#) of frequency to revisit OFLs and recommend an appropriate frequency for CSNA, develop alternatives for accountability measures that would be triggered at specific stock levels, and determine which data to use to analyze whether a trigger level has been reached. The group will provide a report back to the Council in November 2019.

With regard to the nearshore estimation methodology to complement the acoustic trawl survey, as was presented by the [SWFSC](#) to the Council under Agenda Item E.4, there remain inshore areas along the West Coast that are not covered by the existing survey. As such, it is difficult to estimate the proportion of CSNA biomass that may be missed by excluding these areas and therefore not included in biomass estimates. The Council is interested in exploring what other approaches (e.g., collaborative surveys with stakeholders) could be helpful to reduce the uncertainty in the nearshore estimates. This, in turn, could assist the Council in setting annual reference points for the longer-term.

The Council considered a [white paper](#) assessing the trade-offs in terms of overfishing risk associated with less frequent OFL revisions, which would be set using an average biomass estimate over a multi-year time period, compared to more frequent OFL revisions based on the most recent data. Through the proposed joint meeting described above, the Council is seeking scientific and management advice on what an appropriate frequency for updates to CSNA reference points may be.

Additionally, identifying stock levels that should trigger management changes and specific accountability measures that would be implemented at those stock levels could help avoid overfishing. Again, through the effort described above, the Council is seeking scientific and management advice on the specific details for these potential actions.

Finally, with regard to the actively managed and monitored stock categories in the CPS fishery management plan, as noted in the NMFS proposed rule, CSNA are currently in the monitored category. It is the Council's understanding that, until that categorization changes, the overfishing specification process applied to CSNA is consistent with the approach described in the proposed rule. As the Council has indicated previously, we intend to address these CPS management categories and a specific agenda item has been scheduled at our June 2019 meeting for this purpose. In addition, the designation of CSNA as a monitored stock does not preclude the Council from developing a new harvest control rule or reference points for CSNA.

In summary, the Council considers the annual reference points described in the NMFS proposed rule to be a reasonable approach at this time, and we believe these reference points may be updated appropriately as new scientific information becomes available. The Council is not prepared to recommend an alternative approach for CSNA reference points at this time, although efforts are underway to develop additional information to inform alternatives in the future. The Council will be considering the CPS stock management categories in June, and the outcomes from the proposed meeting on nearshore estimation methods, OFL revision frequency, and triggers and accountability measures in November, in an effort to improve our management of CSNA for the longer-term.

PFMC  
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