Public Comments
CPS Management Categories

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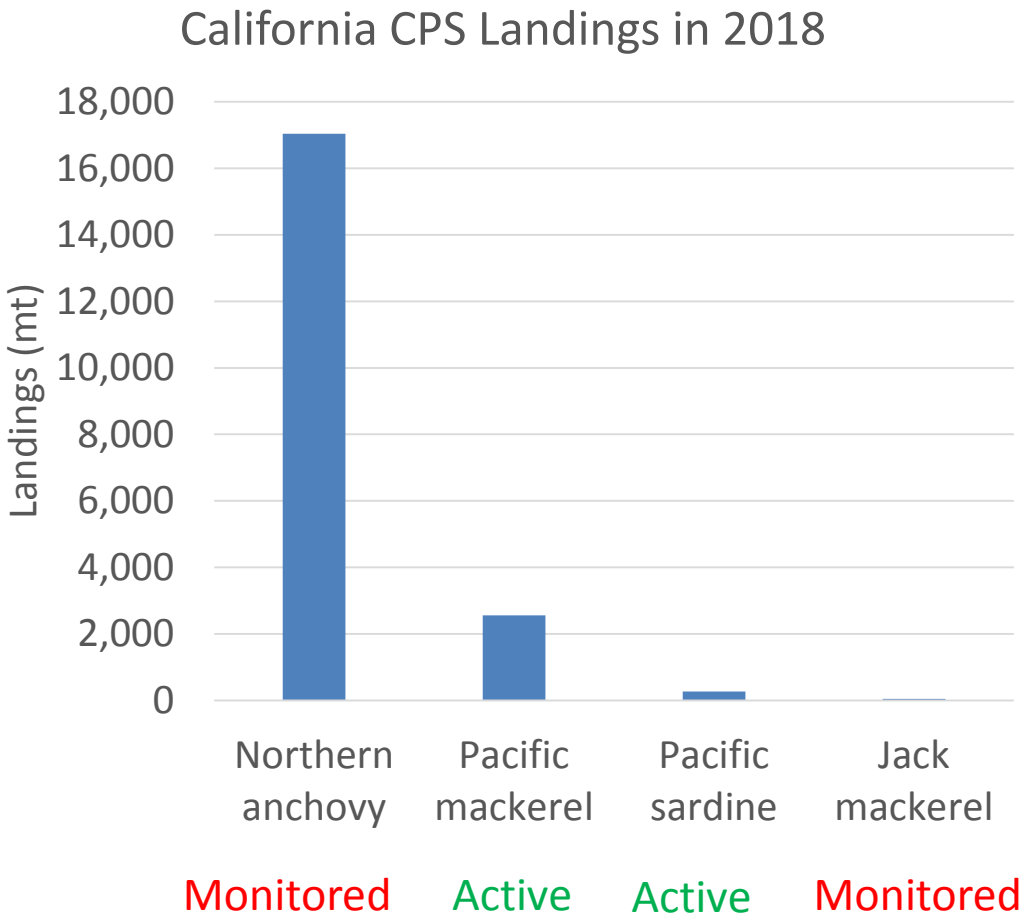
June 21, 2019

OCEANA

Concerns with Council's Implementation of CPS FMP "Monitored" Category

- Not using best available estimates of biomass to inform OFL, ABC, ACLs
- Leads to less data being collected or reviewed
  - no regular review of OFLs and ABCs by the SSC
- No way to determine whether stocks are overfished
  - MSSTs missing for NSNA and jack mackerel
  - Abundance estimates not regularly reviewed against MSST (e.g., CSNA)
- Static quotas result in more severe collapse for highly variable stocks
- Fails to prevent overfishing when stocks are low: 75% ABC buffer is not sufficiently precautionary if stocks can drop by 99% in 2 years
- Not responsive to ecosystem concerns, does not achieve Optimum Yield

Current categories do not reflect recent biological removals



Minimum Stock Size Thresholds

- FMPs must contain Status Determination Criteria to determine whether stock is overfished
- NMFS' tool is MSSTs
- Must be based on best available science

	MSST in FMP	NMFS (2016) MSST Estimates
Pacific sardine	50,000 mt	61,074 - 121,697 mt
Pacific mackerel	18,200 mt	24,599 - 31,370 mt
CSNA	Not specified	69,049 - 69,781 mt
NSNA	Not specified	Not complete
Jack mackerel	Not specified	272,160 mt

Proposed FMP Amendment

There is no longer justification or need for the “monitored” category.

Scope of proposed action:

1) establish an annual specifications process to set OFLs, ABCs, and ACLs for all 5 CPS fish stocks informed by annual estimates of abundance;

2) establish and/or update MSSTs for all stocks of CPS finfish in the FMP; and

3) eliminate the “active” and “monitored” management category terms.

Purposes of FMP Amendment

- ensure consistency with National Standards 1 and 2
- ensure that the CPS FMP prevents overfishing
- include clear status determination criteria for when stocks are overfished
- use best available science
- promote consistency with terminology across the Council's FMPs
- clarify the management strategies for CPS stocks CPS FMP.

A New Framework for CPS

- Annual specification process for all 5 CPS finfish stocks:
  - Set OFLs, ABCs, and ACLs based on best available annual biomass estimates

- Periodic Stock Assessments/ Management Strategy Evaluation (every 5 years)
  - Adjust MSSTs, Fmsy, Harvest Control Rules

Best Available Annual Biomass Estimates

"2018 ATM review concluded acoustic trawl data represented the best scientific information available on an annual basis for assessing abundance of all members of the CPS assemblage, and approved the use of these data for directly (survey-based) or indirectly (model-based) assessing the status of the stock"

-2019 Pacific mackerel assessment

Annual Specifications

OFLs

- Annual U.S. survey biomass x Fmsy

ABCs

- OFL x Uncertainty Buffer

ACLs

- Harvest guideline formula (with cutoff)

Note: no need for “Distribution” term if surveys report U.S.-only biomass

CSNA Harvest Control Rule

- Develop CSNA population simulation model

- Evaluate and select among alternative control rules based on achieving Optimum Yield
  - Risk of collapse
  - Stability in catch limits
  - Economic variable
  - Availability to fish & wildlife predators

Our Requests

- Initiate an FMP amendment at this meeting to:
  1. Establish new MSSTs for all CPS stocks
  2. Establish an annual specifications process for all 5 CPS fish stocks
  3. Remove the active and monitored categories
  4. Establish a new harvest control rule for CSNA