

**HIGHLY MIGRATORY SPECIES ADVISORY SUBPANEL REPORT ON  
PACIFIC SARDINE REBUILDING PLAN – FINAL ACTION**

The Highly Migratory Species Advisory Subpanel (HMSAS) has reviewed the materials submitted under Agenda Item G.1, Pacific Sardine Rebuilding Plan – Final Action. We appreciate the time and detail which both National Marine Fisheries Service (NMFS) and the Coastal Pelagic Species Management Team (CPSMT) devoted to these materials.

The HMSAS recommends that the Pacific Fishery Management Council (Council) adopt the Status Quo alternative as its final preferred alternative for the Pacific Sardine Rebuilding Plan. We base this recommendation on the importance of the live bait fishery to California's recreational and commercial fishing communities. Under Section 304(e) of the Magnuson-Stevens Fishery Conservation and Management Act, a rebuilding plan must specify a time period for rebuilding that, shall “be as short as possible, taking into account the status and biology of any overfished stocks of fish, **the needs of fishing communities**, recommendations by international organizations in which the United States participates, and the interaction of the overfished stock of fish within the marine ecosystem.” (emphasis added)

As outlined in our statement for the June meeting, ([Agenda Item G.1.a, Supplemental HMSAS Report 1, June 2020](#)), sardines play an indispensable role as live bait for the recreational fishing community, a key economic driver of the commercial passenger fishing vessel (CPFV) fleet in southern California. We note, with appreciation, the data and analysis provided by the CPSMT.

Adopting either the Zero Harvest Rate or 5 percent Fixed Harvest Rate alternatives would likely have profound impacts on the recreational fishing community. While there may be alternative live bait sources available (anchovies in particular), this is not an apples-to-apples comparison. As the CPSMT noted, reduced angler satisfaction may accompany the loss of access to sardines as live bait. We also note that dead bait is not a viable alternative for fisheries which are dependent on access to live bait, particularly for HMS recreational fisheries.

We also note that many of the purse seine vessels which target HMS species also participate in the CPS fishery. As of September 8, 2020, nineteen U.S. vessels authorized to use purse seine in the Eastern Pacific Ocean to target tunas also participate in Council managed CPS fisheries. As the CPSMT has noted, these fisheries incidentally harvest sardine in the course of their normal operation. Alternatives 2 and 3 would have dramatic impacts on the commercial fisheries for CPS and market squid, fisheries which provide the backbone for the fishery economies of Moss Landing, Monterey, Ventura, Port Hueneme and Los Angeles Harbors.

Based on the above, we reiterate our recommendation that the Council select the Status Quo Alternative as its final preferred alternative.