

## COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON METHODOLOGY REVIEW TOPIC SELECTION

The Coastal Pelagic Species Advisory Subpanel (CPSAS) respectfully renews our request that the Pacific Fishery Management Council (Council) support an independent methodology review related to the habitat model and temperature assumptions used to separate and apportion the putative ‘northern’ and ‘southern’ sardine stocks (Agenda Item D.3.a, Supplemental CPSAS Report 1, November 2019). Our initial request stemmed from a recommendation by the Scientific and Statistical Committee’s (SSC) CPS Subcommittee in the Subcommittee report to the full SSC for the 2019 update sardine stock assessment. (Appended to SSC Minutes, dated April 10-11, 2019.)

The explicit SSC Subcommittee recommendation was as follows:

*“Italic comments related to the 2020 benchmark assessment:”*

- *An additional 35,000 mt of sardine was observed by the AT survey in the Southern California Bight and attributed to the Southern Subpopulation (SSP). **This highlights the need for the 2020 assessment to review the basis for the habitat model and perhaps refine estimates of both the catch and biomass attributable to the NSP and SSP. (emphasis added)***

The full SSC endorsed the Subcommittee recommendation and, in its minutes, listed as the top recommendation:

*“The 2020 benchmark assessment should:*

- *Examine information on the attribution of catch and biomass between the northern and southern subpopulations...”*

Unfortunately, no data were presented or discussed during the 2020 benchmark assessment, so the CPSAS is again making this request, in light of the presence of a significant abundance of sardines observed by fishermen in California in recent years, particularly in Southern California. These fish have been excluded from sardine stock assessments since at least 2018, based on the assumption that any sardines found in water temperatures above 16.7 degrees C (about 62 degrees F) are attributed to the “southern” stock. Yet in a management paradox and Catch 22, all sardines landed, regardless of temperature, are subtracted from the harvest quota for management purposes.

The CPSAS also highlighted the need for this review as the first step in recommended actions to “Revise management of sardine subpopulations and improve the underlying science,” made under Executive Order 13921 (Agenda Item C.2.a, Supplemental CPSAS Report 1, September 2020). The CPSAS purpose and need statement noted the paradox in temperature assumptions and stated: *“This catch 22 has not only contributed to the closure of directed Sardine fishing in U.S. waters while allowing Mexico to fish Sardines under their own management plan, it precipitated the declaration of an overfished status for Pacific Sardine in the U.S. This is problematic as it not only curtails any opportunity to directly harvest U.S. west coast sardines for the commercial sardine fleet, but incidental take restrictions have sharply limited, and will further restrict and impact, fishing behavior in other fisheries where sardines are taken as incidental catch.”*

We believe a dedicated methodology review of these temperature assumptions is critically important, especially now that sardines have been declared “overfished” and the Council has recommended a rebuilding plan. We would appreciate the Council’s support for this method review as a high priority. Thank you for your consideration.

PFMC  
10/21/20