CALIFORNIA WETFISH PRODUCERS ASSOCIATION
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March 15, 2024

Mr. Brad Pettinger, Chair
And Members of the Pacific Fishery Management Council

REQUEST RENEWAL OF EXEMPTED FISHERY PERMIT (EFP)
TO ALLOW FISHING OF PACIFIC SARDINE FOR BIOLOGICAL SAMPLES IN 2024-25 NEARSHORE RESEARCH PROGRAM

Dear Chair Pettinger and Council Members,

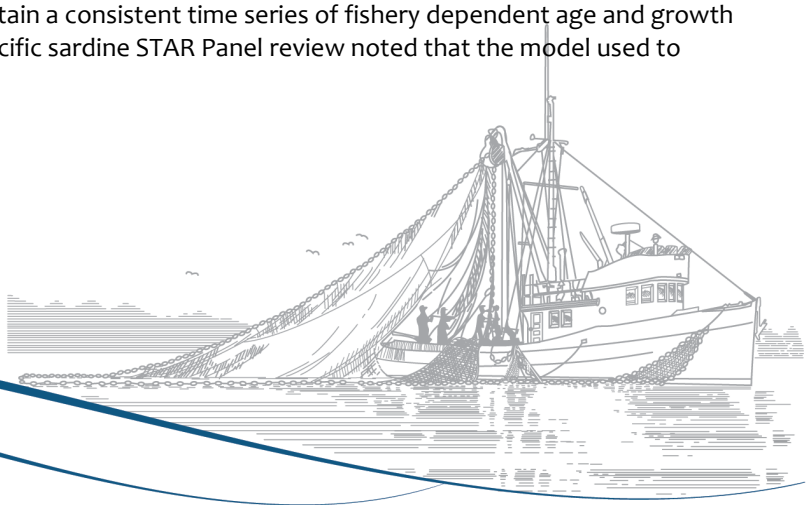
On behalf of CWPA, I am submitting this request for renewal of the EFP authorizing sardine fishing to collect fishery dependent biological samples, continuing the field work begun in May 2020.

Date of Application (4a): March 15, 2024

Applicant Name and Mailing Address (4b):
California Wetfish Producers Association
PO Box 1951, Buellton, CA 93427
(805) 693-5430

Purpose and Goals/Justification/Disposition of Catch (4c and d)
The proposed EFP will continue to serve the primary objective of continuing a time series of fishery dependent biological data for use in sardine biomass models and stock assessments. This EFP also collects biological data from two primary fishing areas during periods of the year not included in NOAA biomass surveys to study the stock structure and dynamics of Pacific sardine, currently defined as northern and southern stocks (similar to the work done under the Saltonstall-Kennedy (SK) investigating seasonal nearshore dynamics of Pacific sardine). Since 2020, the Council has recommended and NMFS has approved EFPs allowing up to 520 mt of Pacific sardine to be harvested, based on the first of these objectives. To maintain a continuing time series of fishery dependent biological data (and conduct research under the SK grant) we again request 520 mt of Pacific sardine. The amount requested would come from the 2024-25 ACL for use during the fishing year from July 1, 2024 to June 30, 2025. Based on recent catches, we believe that the 2024-25 ACL would sufficiently cover the two EFP requests proposed for 2024-25, as well as all other uses approved.

Our initial 2020 EFP was motivated by the need to maintain a consistent time series of fishery dependent age and growth data for Pacific sardine stock assessments. The 2020 Pacific sardine STAR Panel review noted that the model used to



estimate abundance had lacked fishery dependent biological and age data from 2015 forward due to the closure of the directed Pacific sardine fishery. Establishing a data collection protocol that mimics a small directed sardine fishery fills this void by providing fishery dependent data for use by the Stock Assessment Team (STAT) in its assessment models. The EFP's structure and protocols were developed in coordination with the Southwest Fisheries Science Center's lead Pacific sardine stock assessment scientist and the California Department Fish and Wildlife (CDFW) to use a systematic framework for carefully controlled collection of sardines that mirror directed fishery landings for biological information, including age, in both Southern California and Monterey-Central Coast throughout the usual fishing year.

Responding to a question from the CPS Management Team regarding the value of these data, senior assessment scientist Dr. Kevin Hill affirmed the continuing importance of maintaining a time series of fishery dependent age data, while the Pacific sardine fishery remains closed stating, "Biological samples from EFP fishing permits (directed loads), as well as the live bait fishery, are essential to assessing the sardine population. It is important to correctly characterize fishery removals with this sampling, because samples collected from incidental catches do not necessarily reflect local population demographics accurately due to size-selective schooling with other species (e.g. anchovy, mackerels)." (Personal Communication, September 2, 2022). The absence of biological sampling to obtain fishery dependent data after the anchovy fishery declined in the early 1980s caused a 25-year gap in fishery dependent data, which limited stock assessment scientists' ability to develop a new model-based anchovy stock assessment. This EFP is intended to prevent that problem from occurring in Pacific sardine management by filling the data void arising from the directed fishery closure.

The EFP would allow harvesters to collect biological and age data representative of fishery dependent samples unavailable because of the directed fishery closure. To provide data that are most reflective of typical fishery dependent data streams, we collect EFP sets from two areas: Southern California and Monterey-Central Coast. Harvests under the EFP would be limited to 520 mt of sardines (approximately 26 sets of 20 tons on average). In the 2023-24 EFP we used grant monies to help offset operating costs incurred by EFP fishermen. With no grant monies currently available, we propose to maintain the projected EFP catches at an average of 20 mt per trip, the revenues from which are intended to offset costs of fishing. The average trip catch is increased from 17 mt in previous EFPs to account for high fishing costs and relatively weak market conditions. With no funding available to supplement income from vessel catches, no reduction in target catch amounts is possible this year.

Broader Significance (4e)

Since October 2022, biological and age data from this EFP and other sources (including prior EFPs) have been used for analysis in the SK project "Investigating Seasonal Nearshore Dynamics of Pacific Sardine (*Sardinops sagax*) in California" (a collaboration that is supported by the California Department of Fish and Wildlife, which measures and ages the sampled sardines, and includes Dr. Juan Zwolinski, a member of the SWFSC's Acoustic Trawl team). This study is documenting sardine abundance and distribution in California throughout the year in a range of SSTs. Pacific sardines are currently classified as northern and southern stocks based on sea surface temperature (SST) and habitat. Under an updated habitat model that was reviewed at the February 21-23 sardine STAR Panel meeting, most California sardines were classified as from the southern stock, hence removed from the northern sardine stock assessment. This prospect, with its associated management challenges and complexities, presents a management conundrum. The continuing need for biological sampling, in fact the impetus for our SK grant study, is motivated by some of the same concerns that were the focus of the SWFSC's Pacific sardine stock structure workshop in November 2022.

Our SK grant project relies on a framework and protocol for collection and analysis of biological data year-round (including the fishery dependent data authorized by this EFP and monthly samples from live bait operators, as well as observations from fishermen targeting other CPS) to examine hypotheses related to the distribution and separation of northern and southern sardine stocks. Analysis of these biological data and examination of Pacific sardine morphology compared with environmental indices and trends are intended to shed light on sardine stock structure and inform and improve Pacific sardine fishery management. We began this study in October 2022 and the project continues until March 31, 2024. See appendix 2 for a summary of preliminary data. Although the research under the SK grant will be complete

prior to the start of this EFP, we anticipate the data collected under the EFP to have continued utility, as scientists continue to struggle to determine the characteristics of the sardine population off the West Coast.

This EFP will also attempt to coordinate with spring and summer CDFW aerial surveys. When area and timing can be coordinated during survey months, vessels will attempt to capture schools identified by the CDFW observer to provide samples to corroborate aerial survey observations and further validate information collected by those surveys, as suggested by the STAT and Stock Assessment Review panel. Since the spring of 2020, CWPA and CDFW have coordinated 13 sets (or approximately 20 percent of the sets under the EFP) with the CDFW aerial surveys. We will again make efforts to coordinate sets with the CDFW aerial survey.

Continuation of the EFP (4f)
The EFP is proposed to be continued as long as the ongoing need for fishery dependent biological samples for the stock assessment exists. Continuation also depends on the economic feasibility of the EFP, as determined by funding to support this fishing and the marketability of catches from the EFP.

Vessels, Processors and Captains in the EFP (4g)
CWPA has identified 7 vessels that meet the criteria for this research project: 4 in Central California and 3 in Southern California. Five of these vessels also participated in our 2021-22, 2022-23, 2023-24 EFP work. The owners and captains of the two additional vessel have reviewed this application and the procedures for the EFP and fully understand the process for collection of samples.

VESSEL NAME	SKIPPER	OWNER	USCG /REG	CPS PERMIT
Southern CA				
Triton	Pete Ciaramitaro	Triton Fishing Inc.	CF7218UH	14
Provider	Jamie Ashley	Provider LLC	D572344	1
Eileen	Corbin Hanson	Hanson Fisheries Corp.	D252749	38
Monterey				
King Philip	Anthony Russo	Sea Wave Corp	D1061827	9
Trionfo	Aniello Guglielmo	Neil Guglielmo	D625449	45
Ocean Angel III	Phillip John Cunha	Ocean Angel III, LLC	OR108ADL	13
Ocean Angel	Frank Lombardo/Joseph Olmo	Ocean Angel IV, LLC	OR868ADK	22
Natalie Rose	Dominic Aliotti	Natalie Rose LLC	D685870	48

Note: All vessels also are listed on our 2024-25 EFP renewal application to conduct point sets for the aerial survey.

Five processors have been identified to participate in the EFP, 2 in Southern California and 3 in Central California:

Cal-Marine Fish Co., 220 Cannery Street, San Pedro, CA 90731
(offloads FV Eileen, FV Provider, Contact; Vince Torre)

J. DeLuca Fish Company, 2194 Signal Place, San Pedro, CA 90731
(offloads FV Triton; Contact: John DeLuca)

Monterey Fish Company, 960 South Sanborn Road, Salinas, CA 93901, offloading in Moss Landing, CA
(offloads FV King Philip; Contact Anthony Tringali, or Ken Towsley)

Southern Cal Seafood, Monterey, CA; Contact Pete Guglielmo
(offloads FV Trionfo)

Del Mar Seafoods, 331 Ford Street, Watsonville, CA; Contact Carter Goetz or Joseph Roggio
(offloads FV Ocean Angel III, FV Ocean Angel, and FV Natalie Rose)

Species to be harvested (4h)
Under this project, purse seine vessels will be directed to capture approximately20 mts (on average) of sardines from a school of sardines each month in each area, with total catch of at most 520 mt. An EFP is necessary because the directed Pacific sardine fishery is closed and is anticipated to remain closed in 2024-25. No measurable impacts to non-target species are anticipated.

Justification of the amount of harvest (4i)
The request for 520 mt of sardines to support this EFP will allow for approximately 26 sets of approximately 20 mts each spread throughout the year. The quantity of fish requested creates a reasonable incentive for fishermen to participate in the EFP, given fuel and crew costs and the potential for some trips to yield no or few sardines. The sale of fish also helps to offset costs for processors who support the EFP through fish handling and bucket sampling the sets. This request acknowledges the current stock status of the northern subpopulation of Pacific Sardine, and the need for allocation of available tonnage to other fishery sectors.

Monitoring of catch (4j)
Fishermen will maintain a log to identify the location and time of each set (see Appendix 3). Upon landing, biologists will take a subset of each set at the dock for processing to obtain biological characteristics and age of individual fish. Processors will maintain bucket sample records of the weight of Pacific sardine and other species groups, to validate species composition.

CWPA will notify NMFS and CDFW Enforcement at least 12 hours before a vessel goes out to inform them of vessel's name and locations to be targeted for sampling, and the processor who will be receiving research fish that day. CWPA will also report the landing, lat/long position of the catch and the total catch in relation to the total EFP amount at the conclusion of every EFP trip.

The survey plan anticipates sending no more than one vessel per month in each area, except during aerial survey months.

In addition, CWPA will maintain a record of the volume/total weight of sardines captured on each trip and will monitor progress toward the EFP limit. These weights and species composition per set will also be included in a final report.

Data collection methods (4k)
All trip catches will be subsampled by CDFW biologists dockside upon landing. CDFW biologists will obtain a 5-gallon subsample of fish at quarterly intervals of pumping each set, using a quantitative bucket sampling method. Up to 50 fish per species (if set consists of mixed fish) per set will be collected by a CDFW biologist/sampler upon landing of the daily

catch. The four collected fish subsamples will be stored in plastic bags and preserved on ice. At the CDFW laboratories these samples will be measured for biological characteristics (length, weight, sex, maturity, and age).

Scientific data collection and analysis will be supervised by CDFW and NOAA scientific staff, who will collaborate on procedures to ensure and evaluate data quality during the survey, and data analysis methodology through completion of the project.

Vessel selection (4l)
Vessels were identified for participation in the research based on vessel size, equipment, skippers' experience, and commitment to the research. The five vessels identified have committed to participate voluntarily in this research, notwithstanding any other fishing opportunities during the project period. All vessels have participated in EFP work in prior years and have demonstrated the ability to carry out the required protocols.

Fishing time, place, and gear (4m)
This project will take place in nearshore waters of the Central Coast of California (Monterey – Half Moon Bay) and the Southern California Bight. We plan to follow the same protocols as currently employed (including attempting to schedule at least one set per month in both Monterey-Central Coast and Southern California to have samples distributed throughout the year) following the protocol recommended by sardine stock assessment scientists and federal and state scientists working on Pacific sardine research. Fishing gear used is purse seine net of suitable mesh size and length for capturing CPS schools.

We look forward to the opportunity to continue to provide support for sardine stock assessments and furthering the understanding of sardine stock structures through this EFP.

Thank you very much for your consideration.

Sincerely,

Mark Fina
Executive Director

Appendix 1 – Summary of data collected in the 2021-22 EFP and the 2022-23 EFP to date.

July 1 '23- June 30 '24 – 520 metric tons

	S.CA Set #		260 mt Landing Date	Vessel	Port	Processor	Capture Latitude	Capture Longitude	SST	Total Sardine Lbs	Sardine MT
	1 - SK		7/18/2023	Provider	San Pedro	Cal Marine	N 33.18.84	W 118.22.74	68	27,788	12.60
	2 - SK		8/16/2023	Provider	No Fish caught						
SEMESTER	3		8/23/2023	Provider	San Pedro	Cal Marine	N 33.18.42	W 118.22.24	66	38,765	17.58
1	4- SK		9/12/23	Provider	San Pedro	Cal Marine	N 33.18.24	W 118.22.48	68	15,502	7.03
Jul-Dec '23	5 - SK		10/12/2023	Provider	San Pedro	Cal Marine	N 33.36.33	W 117.56.11	66	29,156	13.23
	6 - SK		12/19/2023	Provider	San Pedro	Cal Marine	N 33.42.06	W 118.16.74	62	44,484	20.18
SEMESTER 2 Jan-Jun '24	7		2/16/2024	Provider	San Pedro	Cal Marine	N 33.42.11	W 118.16.37	59	43,129	19.56
SubTotal S.CA										198,824	90.19
Balance S.CA.											169.81

	MONTEREY Set #		260 mt Landing Date	Vessel	Port	Processor	Capture Latitude	Capture Longitude	SST	Total Sardine Lbs	Sardine MT
SEMESTER	1 - SK		7/27/2023	Trionfo	Monterey	SoCal Sfd	N 36.52.982	W 121.51.313	58	16,469	7.47
	2 - SK		8/15/2023	King Philip	No fish caught						
	3		9/12/2023	Trionfo	Monterey	SoCal Sfd	N 36.37.09 N 36.36.66	W121.51.72 W 121.36.661	59	79,727	36.16
1	4 - SK		9/19/23	King Philip	Monterey	MFC	N 36.40.394	W 121.49.587	61.5	61,689	27.98
Jul-Dec '23	5		10/10/2023	King Philip	Monterey	MFC	N 36.43.52	W 121.56.56	59	37,163	16.86
	6		10/19/2023	Trionfo	Monterey	SoCal Sfd	N 36.39.116	W 121.51.777	60	38,652	17.53
	7 - SK		11/21/2023	King Philip	Monterey	MFC	N 36.37.95	W 121.31.11	60	60,948	27.65
SEMESTER 2 Jan-Jun '24											
SubTotal Monterey										294,648	133.65
Balance Monterey											126.35
TOTAL											223.84
BALANCE											296.16

Appendix 2 - Preliminary data collected under EFP 2022 (including some comparisons to 2020 and 2021).

South

Month	# of samples taken	# of fish
January	0	0
February	0	0
March	2	50
April	1	25
May	0	0
June	4	95
July	0	0
August	0	0
September	0	0
October	0	0
November	1	25
December	0	0
Totals	**8**	**195**

North

Month	# of samples taken	# of fish
January	0	0
February	0	0
March	0	0
April	0	0
May	0	0
June	0	0
July	0	0
August	0	0
September	2	50
October	1	25
November	0	0
December	0	0
Totals	**3**	**75**

Or combined:

South	# of samples taken			# of fish		
Month	**2020**	**2021**	**2022**	**2020**	**2021**	**2022**
January	0	0	0	0	0	0
February	0	2	0	0	50	0
March	0	1	2	0	25	50
April	0	1	1	0	25	25
May	4	1	0	100	25	0
June	6	1	4	150	25	95
July	0	1	0	0	25	0
August	0	0	0	0	0	0
September	0	2	0	0	50	0
October	1	1	0	25	25	0
November	3	1	1	75	25	25
December	1	1	0	25	25	0
Totals	**15**	**12**	**8**	**375**	**300**	**195**

North	# of samples taken			# of fish		
Month	**2020**	**2021**	**2022**	**2020**	**2021**	**2022**
January	0	0	0	0	0	0
February	0	3	0	0	75	0
March	0	0	0	0	0	0
April	0	0	0	0	0	0
May	3	0	0	75	0	0
June	11	0	0	275	0	0
July	0	0	0	0	0	0
August	0	0	0	0	0	0
September	5	0	2	125	0	50
October	1	0	1	25	0	25
November	1	0	0	25	0	0
December	0	0	0	0	0	0
Totals	**21**	**3**	**3**	**525**	**75**	**75**

Appendix 3. Fisherman's log form

CPS Biological Sample Sardine EFP

Fisherman's Log Form

Date: _____ **Captain:** _____

Vessel: _____ **Processor:** _____

Estimated Catch _____**(st)** **Delivered Weight** _____**(lbs)** **Fish Ticket No.** _____

Species Observed _____

Hydroacoustic Gear

Type	Make	Model	Frequency
Sounder			
Sonar			

Net Dimensions

Net Length (fm)	Net Depth (fm)	Mesh Size (in)

School and Ocean Data

Set Start Time	Latitude	Longitude	Top Depth of School (fm)	Bottom Depth of School (fm)	Ocean Depth (fm)	SST (F)	Weather Condition	Picture of Sonar (Y/N)

Weather Codes: 1= calm, clear; 2= light wind, good visibility; 3= moderate wind, fair visibility; 4= poor fishing conditions

Comments and sonar interpretations:

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