



CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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

LETTER OF INTENT TO REQUEST RENEWAL OF EXEMPTED FISHERY PERMIT (EFP) TO ALLOW COLLECTION OF PACIFIC SARDINE BIOLOGICAL SAMPLES IN 2025-26

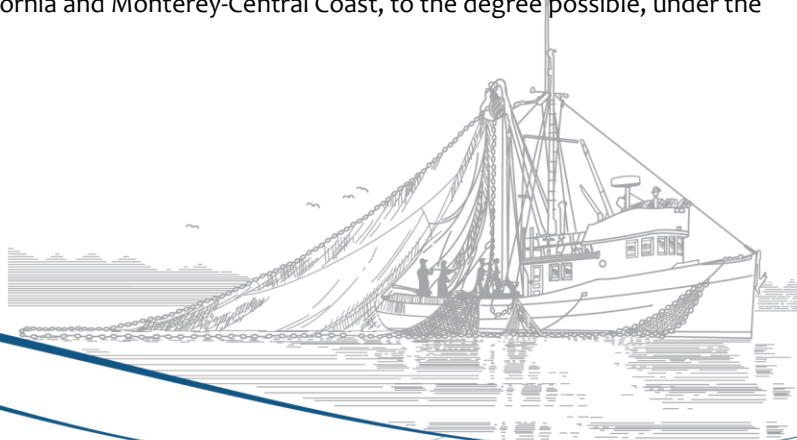
Dear Chair Pettinger and Council Members,

On behalf of California Wetfish Producers Association (CWPA), I am submitting this request for renewal of the Exempted Fishing Permit (EFP) authorizing sardine fishing to collect biological samples, enabling us to continue the field work begun in May 2020. The proposed EFP is the continuation of a time series of fishery dependent data for use in stock assessments. The Council recommended and NMFS approved similar EFPs from 2020-21 to 2023-24 (and the pending 2024-25 EFP).

The EFP is necessary to allow the directed harvest of sardines to collect biological/age data representative of fishery dependent data unavailable because of the directed sardine fishery closure. To provide data that are most reflective of typical fishery dependent data streams, we collect EFP sets from two areas: Southern California fishing areas around Los Angeles and more northern areas around Monterey-Central Coast. The EFP for the current season (2024-2025) has yet to be issued. In the 2023-24 biological sampling EFP, we succeeded in landing 19 sets:

Southern California - 190.9 mt in 11 sets on 12 trips
Central California - 168.3 mt in 8 sets on 10 trips.

Five sets in Southern California were taken in waters above 16.7°C sea surface temperature (SST) and would likely be classified as southern subpopulation Pacific sardine. The remaining six sets would likely be classified as northern subpopulation Pacific sardine. All eight sets in Central California were collected from waters below 16.7 °C SST and would likely be classified as northern subpopulation Pacific sardine. To support research into the understanding of the stock distribution of Pacific sardines, efforts are being made to collect a sample each month from each area. Vessel availability has and may limit the EFP catches in Central California during winter months, when Monterey EFP vessels transit south to fish for squid, along with a majority of the Monterey CPS fleet. At times multiple trips may be scheduled in a month to compensate for these circumstances. Tables 1 and 2 show the catch under the most recent biological sample EFP and all biological sample EFPs to date. In 2023-24, 359.2 mt of Pacific sardine were harvested under the EFP, leaving 160.8 mt unharvested. We intend to schedule biological sampling sets in both Southern California and Monterey-Central Coast, to the degree possible, under the 2024-25 EFP.



Representing California's Historic Fishery

Letter of Intent 2025-2026 EFP Biological Sampling

For the 2025-26 period, the EFP will follow its original framework shown in Table 3. As noted above, EFP vessel availability complicates adherence to the proposed framework, but when possible that framework will be followed. All landings under the EFP will be sampled by the California Department of Fish and Wildlife (CDFW) to produce biological data, including age, for potential use in the stock assessment model. Samples may also be used to test the current temperature assumptions related to stock structure.

Our initial 2020 EFP was motivated by the need to maintain a consistent time series of fishery dependent data for sardine stock assessments. The 2020 sardine Stock Assessment Review (STAR) Panel review noted that the model used to estimate sardine abundance had lacked fishery dependent biological and age data from 2015 forward due to the closure of the directed sardine fishery. Establishing a data collection 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 assessments. The EFP's original structure and protocols were developed in coordination with the Southwest Fisheries Science Center's (SWFSC) lead sardine stock assessment scientist and the CDFW to use a systematic framework for collection of sardines that mirror directed fishery landings for the purpose of biological sampling, including age, in both Southern California and the 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 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." (Personal Communication, September 22, 2022). The absence of biological sampling from the anchovy fishery after that 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 sardine management by filling the data void arising from the directed fishery closure. To maintain a continuing time series of fishery dependent biological data, we again request 520 mt of sardine.

Data from this EFP also supported additional research into the stock structure of sardine in the Southern California Bight and intermixing with the sardine from other areas that may occur. Additional data, particularly from a broader area of the Southern California Bight than currently available, may be beneficial to further the understanding of the stock structure of sardine and interactions as sardine move across different areas.

The 2025-26 EFP request for 520 mt of sardines allows for approximately 30 sets of 17 mt on average. This quantity of fish 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. The potential requests acknowledge the current stock status of the northern subpopulation of Pacific sardine, and the need for allocation of available tonnage to other fishery sectors. In light of recent year landings, the 2025-26 ACL should cover this EFP request.

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

Thank you very much for your consideration.



Mark Fina
Executive Director

Attachments: 2024-25 Bio Sampling EFP application

Letter of Intent 2025-2026 EFP Biological Sampling

Table 1: Catches under the 2023-24 EFP

July 1 '23- June 30 '24 – 520 metric tons																	
S.CA			260 mt														
	Set #		Landing Date	Vessel	Port	Processor	Capture Latitude	Capture Longitude	SST - F	Total Sardine Lbs	Sardine MT	Total Anchovy Lbs	P&J Mackal Lbs	Other Species Lbs	Total Landed Wt. Lbs	Total Landed Wt. MT	
SEMESTER 1 Jul-Dec '23	1 - SK		7/18/2023	Provider	San Pedro	Cal Marine	N 33.18.84	W 118.22.74	68	27,788	12.60				27,788	12.60	
	2 - SK		8/16/2023	Provider	No Fish caught												
	3		8/23/2023	Provider	San Pedro	Cal Marine	N 33.18.42	W 118.22.24	66	38,765	17.58				38,765.00	17.58	
	4 - SK		9/12/23	Provider	San Pedro	Cal Marine	N 33.18.24	W 118.22.48	68	15,502	7.03				15,502.00	7.03	
	5 - SK		10/12/2023	Provider	San Pedro	Cal Marine	N 33.36.33	W 117.56.11	66	29,156	13.23				29,156.00	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				44,484.00	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				43,129.00	19.56	
	8		3/19/2024	Provider	San Pedro	Cal Marine	N 33.43.16	W 118.11.16	59	94,977	43.08				94,977.00	43.08	
	9		4/16/2024	Provider	San Pedro	Cal Marine	N 33.43.22	W 118.07.75	60	45,111	20.46				45,111	20.46	
	10		5/9-10/2024	Provider	San Pedro	Cal Marine	N 33.43.78	W 118.11.68	62	31,772	14.41				31,772	14.41	
	11		5/29/2024	Provider	San Pedro	Cal Marine	N 33.41.47	W 118.86.72	60	24,097	10.93				24,097	10.93	
	12		6/5/2024	Provider	San Pedro	Cal Marine	N 33.42.90	W 118.02.51	63	26,086	11.83				26,086	11.83	
SubTotal S.CA							62.06			420,867	190.90						
Balance S.CA.											69.10						
MONTEREY			260 mt														
	Set #		Landing Date	Vessel	Port	Processor	Capture Latitude	Capture Longitude	SST - F	Total Sardine Lbs	Sardine MT	Total Anchovy Lbs	P&J Mackal Lbs	Other Species Lbs	Total Landed Wt. Lbs	Total Landed Wt. MT	
SEMESTER 1 Jul-Dec '23	1 - SK		7/27/2023	Trionfo	Monterey	SoCal Sfd	N 36.52.982	W 121.51.313	58	16,469	7.47				16,469.00	7.47	
	2 - SK		8/15/2023	King Philip	No fish caught												
	3		9/12/2023	Trionfo	Monterey	SoCal Sfd	N 36.37.09	W121.51.72	59	79,727	36.16				79,727.00	36.16	
							N 36.36.66	W 121.36.661									
	4 - SK		9/19/23	King Philip	Moss Landing	MFC	N 36.40.394	W 121.49.587	61.5	61,689	27.98				61,689	27.98	
	5		10/10/2023	King Philip	Moss Landing	MFC	N 36.43.52	W 121.56.56	59	37,163	16.86				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				38,652	17.53	
	7 - SK		11/21/2023	King Philip	Moss Landing	MFC	N 36.37.95	W 121.31.11	60	60,948	27.65				60,948	27.65	
SEMESTER 2 Jan-Jun '24	8		4/30-5/1/24	Trionfo	Monterey	SoCal Sfd	N 36.37.50	W 121.51.52	59	55,471	25.16			227	55,698	25.26	
	9		5/29/24	Trionfo	Monterey	SoCal Sfd	N 36.37.430	W 121.515.74	58	20,914	9.49				20,914	9.49	
	10		6/6/2024	Natalie Rose	Moss Landing	Del Mar Sfd				no fish							
(No samplers available for bio sample sets in Moss Landing the week of Jun 24 due to point set activity scheduled in Monterey (only one sampler in Monterey))																	
SubTotal Monterey										371,033	168.30						
Balance Monterey											91.70						
TOTAL											359.20						
BALANCE											160.80						

Table 2. Available Tonnage and Use under previous EFPs (2019-20 to 2024-25) – in mt.

	Catch			Available	Unused
	Southern California	Central California	Total		
2019 - 2020	345.1	241.1	586.2	640	53.80
2020 - 2021	373.4	245.1	618.4	740	121.58
2021 - 2022	340.0	0.0	340.0	520	180.01
2022 - 2023	102.3	95.8	198.1	520	321.88
2023 - 2024	190.9	168.3	359.2	520	160.80
2024 - 2025	Approval Pending				

Table 3 Framework for allocating sample sets in 2022 (provided as a guideline, weather dependent)

SOUTHERN CA				NORTHERN CA			
(Approx. 6 samples per semester per area)							
Jul (SSP)	-			Jul			
Aug (SSP)	-			Aug (Aerial)	<u>2</u>		34
Sep (SSP)	-			Sep (Aerial)	<u>3</u>		51
Oct	<u>1</u>	17		Oct	<u>1</u>		17
Nov	<u>2</u>	34		Nov	<u>2</u>		34
Dec	<u>3</u>	51		Dec	<u>1</u>		17
Semester 1	<u>6</u>	102	(NSP)	255	<u>9</u>		153
2023							
Jan				Jan	<u>1</u>		17
Feb	<u>1</u>	17		Feb	<u>2</u>		34
Mar	<u>1</u>	17		Mar	<u>1</u>		17
Apr (Aerial)	<u>4</u>	68		Apr	<u>1</u>		17
May	<u>1</u>	17		May	<u>1</u>		17
Jun				Jun	<u>2</u>		34
Semester 2	7	119	(NSP)	255	8		136
2022-23	13	221		510*	17		289
TOTAL				520 MT			

*Note: The total EFP request is for 520 mt. The framework guideline total of 510 mt allows for an extra 10 mt to account for sets that might come in above the guideline set volume of 17 mt.

The total of all sets will be tallied against the requested EFP amount of 520 mt, as was done in 2021, and total number of sets will be adjusted accordingly to ensure this EFP does not exceed the total volume allowed