



## CALIFORNIA WETFISH PRODUCERS ASSOCIATION

PO Box 1951 • Buellton, CA 93427 • Office: (805) 693-5430 • Mobile: (805) 350-3231 • Fax: (805) 686-9312 • [www.californiawetfish.org](http://www.californiawetfish.org)

March 14, 2018

Mr. Phil Anderson, Chair, and  
Members of the Pacific Fishery Management Council  
7700 NE Ambassador Place #200  
Portland OR 97220-1384

RE: Agenda Item C.2.b. REVISED APPLICATION FOR EXPERIMENTAL FISHERY PERMIT  
TO ALLOW TAKE OF PACIFIC SARDINE IN 2018 NEARSHORE RESEARCH PROGRAM

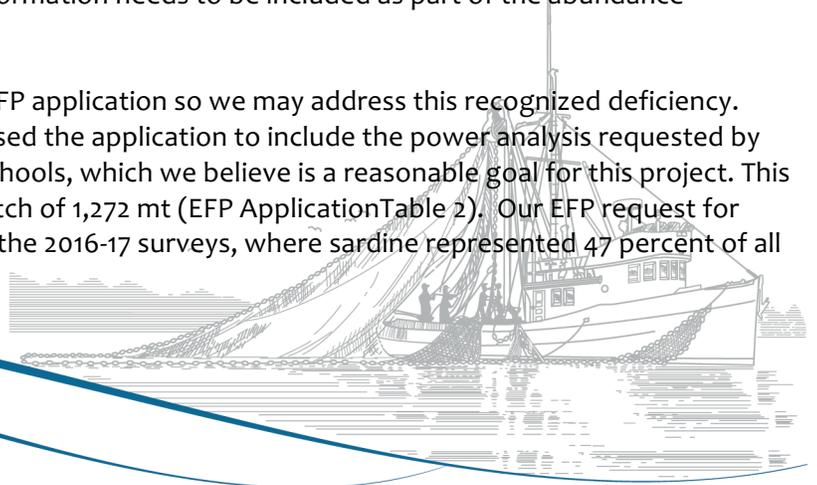
Dear Mr. Anderson and Council members,

The California Wetfish Producers Association (CWPA) represents the majority of fishermen and processors who harvest and process coastal pelagic species in California. Until recent years, our historic “wetfish” industry has produced 80 percent or more of total California fishery landings, representing as much as 40 percent of total statewide ex vessel value.

As you’re aware, CWPA has partnered with the Department of Fish and Wildlife since 2012 in an effort to improve scientific assessments for coastal pelagic species by documenting biomass in coastal waters inshore of NOAA egg-larval and acoustic trawl surveys. Fishermen have observed an abundance of both sardine and anchovy in State waters inside the 20-fathom curve since 2015. In fact, 70 percent or more of our sardine and anchovy catch is taken in this nearshore area. But this abundance is not included in stock assessments.

The need to include the nearshore biomass in stock assessments has been identified as a serious problem in both the 2017 sardine STAR panel review and recent Acoustic Trawl Method review. The recent ATM review report emphasized that acoustic trawl biomass estimates can be used for anchovy only if the inshore area is addressed. **The same caveat should also apply to sardine!** The ATM review report also acknowledged that the CDFW/CWPA aerial surveys documented both sardine and anchovy inshore of the NOAA acoustic survey, and recommended “nearshore distribution information needs to be included as part of the abundance estimation process.”

CWPA appeals to the Council to approve our EFP application so we may address this recognized deficiency. With help from Department scientists, we revised the application to include the power analysis requested by the SSC. Our target n sample size is now 23 schools, which we believe is a reasonable goal for this project. This number corresponds to an expected target catch of 1,272 mt (EFP Application Table 2). Our EFP request for 600 mt sardine is based on observations from the 2016-17 surveys, where sardine represented 47 percent of all CPS observed.



**Table 1. Summary data from 2016-17 aerial surveys for Pacific sardine and northern anchovy observations.**

	2016-17 Aerial Survey
Survey days	15
Observed Schools	1,920
Observed Tons	107,040
Mean School Size (mt)	56
Mean Schools per Day	128
Total Schools for 7 Days	896
Sardine tons > 7m depth	18,690 (55%)
Sardine tons < 7m depth	15,589 (45%)
Anchovy tons > 7m depth	69,642 (96%)
Anchovy tons < 7m depth	3,119 (4%)
Proportion of sardine	47%

Clearly, our aerial surveys have documented a significant biomass of both sardine and anchovy in the nearshore inside of current acoustic surveys, and it is critically important for the future of the wetfish industry in California that CPS stock assessments be improved to include this biomass.

CWPA is committed to help the Department and Southwest Fishery Science Center improve the science, which will lead to better-informed fishery management. We urge the Council to help us by approving our EFP application.

Thank you for your consideration.

Best regards,



Diane Pleschner-Steele  
Executive Director