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FISH AND WILDLIFE SERVICE
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IN REPLY REFER TO:
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October 22, 2018

Phil Anderson, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, Oregon 97220

Subject: Agenda Item E.5—Review of Fishery Management Plan Management Categories

Dear Mr. Anderson and Council Members:

The U.S. Fish and Wildlife Service (USFWS) appreciates the continuing focus of the Pacific Fishery Management Council (Council) on improved assessment and management of coastal pelagic species. As the Council is aware, coastal pelagic species, particularly northern anchovies (*Engraulis mordax*), are critically important forage fish on which California brown pelicans (*Pelecanus occidentalis californicus*) and other marine predators in the California Current Ecosystem depend (Anderson et al. 1982, Ainley et al. 2014, Szoboszlai et al. 2015, Koehn et al. 2016). Because extreme fluctuations in biomass are characteristic of coastal pelagic species, regular assessments and reviews of harvest management specifications are likely necessary to ensure that the objectives of the Magnuson-Stevens Fishery Management and Conservation Act and the goal of the Coastal Pelagic Species Fishery Management Plan to “provide adequate forage for dependent species” (PFMC 2016) are being met.


Our comments concern Agenda Item E.5—Review of Fishery Management Plan Management Categories. We recommend that the Council remove the distinction between “Monitored” and “Active” stocks from the Coastal Pelagic Species Fishery Management Plan. We believe this change will facilitate the use of the best available science in setting the overfishing limit (OFL), acceptable biological catch (ABC), and annual catch limit (ACL) for stocks that are currently classified as “Monitored.” As the Coastal Pelagic Species Management Team (CPSMT) report indicates, “categorization as a Monitored stock does not preclude changes to either harvest specifications when new scientific information becomes available to warrant a change [...] or conducting stock assessments,” but “under the current framework, management of Monitored finfish stocks involves tracking landings against precautionary ACLs and qualitative comparison to available abundance data, or other scientific information” (CPSMT Report 1, Agenda Item E5a). In the case of the central subpopulation of northern anchovy, the stock’s “Monitored” categorization appears to have hindered any rapid management response to indications (both ecosystem evidence and survey evidence, summarized in USFWS 2016) of extremely low northern anchovy biomass persisting over several years, despite its potential implications for the validity of the OFL, ABC, and ACL. Although the Council’s Scientific and Statistical

Committee (SSC) determined that “there is a basis for reconsidering the current overfishing limit [for the central subpopulation of northern anchovy], which is based on a model using data from a historical period and collected under dramatically different environmental and abundance conditions” (SSC 2016) and stated that it had “major concerns” with the method used to estimate the current OFL for the central subpopulation of northern anchovy (SSC 2018), it also acknowledged the lack of procedures to update OFL and ABC for monitored stocks: “in contrast to actively-managed CPS, there are currently no set procedures for setting and updating OFLs and acceptable biological catches for monitored species, including [the central subpopulation of northern anchovy]” (SSC 2016).

More generally, the distinction between “Monitored” and “Active” stocks may lead to a self-reinforcing two-tier system that limits the movement of stocks from “Monitored” to “Active” status. The CPSMT report notes that “the nature of assessment requirements and agency resources to meet the management needs of the two CPS categories over the past 20 years has led to Monitored stocks becoming more data limited than the Active stocks” (CPSMT Report 1, Agenda Item E5a), indicating that monitored stocks may become data limited precisely because they are de-prioritized for assessment. Although Monitored stocks “are not precluded from quantitative assessment at any time, based on management need and data availability and quality” (CPSMT Report 2, Agenda Item E6a), the data limitations that develop because a stock is characterized as “Monitored” would tend to preclude quantitative assessment, make it difficult to change a stock assignment from “Monitored” to “Active,”¹ and complicate evaluation of whether default management measures retain their validity over time as extreme fluctuations in biomass occur.

In summary, we recommend that the Council remove the “Monitored” and “Active” categorizations from the Coastal Pelagic Species Fishery Management Plan and actively manage all stocks. We thank the Council for its commitment to ecosystem-based management of fisheries. If you have questions regarding this letter, please feel free to contact Lilian Carswell, of my staff, at (805) 677-3325 or Lilian_Carswell@fws.gov.

Sincerely,


Stephen P. Henry
Field Supervisor

¹ “Any future action to change a stock’s assignment to either the Active or Monitored category would entail an evaluation of the quality and quantity of data available to assess stock status and manage under the framework of the Active category” (CPSMT Report 1, Agenda Item E5a).

Literature Cited

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