



June 21, 2021

Mr. Marc Gorelnik, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, OR 97220

Re: Agenda Item H.3: Management Framework for the Central Subpopulation of Northern Anchovy

Dear Chair Gorelnik:

Wild Oceans was founded nearly five decades ago by conservation-minded recreational fishermen dedicated to keeping the oceans wild and preserving fishing opportunities for the future. We promote a broad, ecosystem-based approach to fisheries management that reflects our expanding circle of concern for all marine life and the future of fishing.

Wild Oceans enthusiastically supports the Pacific Fishery Management Council's commitment to developing a management framework for the central subpopulation of northern anchovy (CSNA). We request the Council initiate the Scoping of an FMP Amendment in November 2021 to:

- 1) Consider adopting the Flowchart (CPSMT Report 1, June 2021 Figure 2); The Flowchart provides the Council and stakeholders with a transparent decision-making tool that takes advantage of the newly-available annual ATM biomass estimates for CSNA; and
- 2) Evaluate Flowchart parameter values (CPSMT Report 1, June 2021, Table 1). To implement the Flowchart, values for each parameter must be chosen, including those that define long-term and short-term biomass. We support evaluation of the broad range of parameter alternatives presented in Table 1 including a 1, 2 and 3 year definition of short-term biomass.

Amending the FMP to include the updated framework ensures clarity, accountability and transparency needed to inform stakeholders. The FMP Amendment process provides a critical opportunity for stakeholders to evaluate and participate in transparent decision making based on public input and scientific review. The end result gives stakeholders clarity about council priorities and management responses and ensures accountability.

This framework follows other actions taken by the Council to protect the marine food chain including 1) adoption of CEBA-1, 2) a complete ban on commercial fishing for all species of krill in the West Coast waters, 3) inclusion of a “cutoff” in the Pacific sardine control rule which recognizes that fishing during periods of low abundance can exacerbate natural declines, and 4) maintaining a large buffer between OFL and ABC in CSNA management.

The Council’s precautionary management of CSNA is equally important for the health of the California Current large marine ecosystem. Demand for fish meal is increasing, resulting in mounting fishing pressure on forage fish populations, which are also threatened by changing ocean conditions. The demand for forage fish now accounts for more than a third of all marine fish landings globally, with about 90 percent of the total catch reduced into fish meal or oil. The global growth of the aquaculture industry raises the potential for developing new fisheries on forage fish off the West Coast.

A healthy forage base yields ecological and economic gains. Wild Oceans members understand that forage fish are essential to the health and productivity of the ecosystem overall as well as to important commercial and recreational fish that feed on little fish. Scientists with the Lenfest Forage Fish Task Force agree and concluded that forage fish are worth twice as much left in the water as prey for commercially-valuable species as they are to fisheries that harvest them directly.

We look forward to working with you as you continue to protect the base of the California Current Large Marine Ecosystem while providing meaningful commercial opportunities.

Sincerely,

A handwritten signature in cursive script, appearing to read "Theresa Labriola".

Theresa Labriola