



November 11, 2021

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

RE: Agenda Item I.2: CPS Management Categories FMP Amendment Scoping

Dear Chair Gorelnik and Council members:

We support the initial Coastal Pelagic Species Fishery Management Plan (CPS FMP) amendment language put forward by the CPS Management Team (CPSMT). However, the amendment should be expanded to include the new management framework for the Central Subpopulation of Northern Anchovy (CSNA). Specifically, we urge the Council to direct the CPSMT to bring to the March, 2022 Council meeting an alternative incorporating updated CSNA management as described in proposed revisions to COP 9 Schedule 3,¹ and ensure this alternative would be implemented through a biennial specifications cycle.

Our organizations are dedicated to the protection of seabirds and their habitats. Anchovy are fundamental prey for California Least Tern, Sooty Shearwater, Common Murre, Brown Pelican and many more species of breeding and visiting seabirds. For this reason our organizations have since 2013 been advocating for an updated management framework for CSNA that ensures the stock is monitored and is checked regularly to ensure allowable catches reflect the health and abundance of the stock of this highly fluctuating forage fish. Far from being a minor fishery, anchovy is frequently among the top three largest fisheries in California by tonnage. In 2019, the fishery caught over 22,408 mt, comprising more than 20% of total California commercial fishery landings, second only to market squid.² Coastwide the anchovy fishery has exceeded the catches of all other CPS finfish combined.³

We are pleased the Council is poised to adopt the new framework, laboriously developed through the hard work of the CPSMT and the Science and Statistical Committee. As we have

¹ <https://www.pcouncil.org/documents/2021/11/c-9-a-cpsmt-report-1-proposed-changes-to-council-operating-procedure-9.pdf/>

² *Origin and Poundage of Commercial Fish Landings into California During 2019*, Cal. Dept. of Fish & Wildlife (Feb. 19, 2020), <https://nrm.dfg.ca.gov/FileHandler.ashx?DocumentID=178009&inline>

³ <https://www.pcouncil.org/documents/2020/10/2019-cps-safe-june-2020.pdf/>

previously indicated, our organizations support the new anchovy framework as presented at the June 2021 Council meeting⁴ insofar as it:

- Uses best available estimates of anchovy biomass from NMFS ATM surveys and/or other sources;
- Conducts a formal check-in of short-term biomass estimates every two years;
- Uses pre-determined harvest control rule formulas to set ABC levels;
- Maintains a constant, precautionary ABC when the stock is healthy to provide fishery stability;
- Contains objective, numerical triggers that require lower ABC in response to declines in short-term biomass with an explicit numerical formula for setting a lower ABC;
- Is consistent with the management cycles for actively managed CPS and groundfish.

We also note unanimous support for the framework and the adopted framework parameters by the CPS Advisory Subpanel.⁵

We believe that implementation through regularly scheduled specifications is the only way to ensure that NMFS and the Council follow the framework. We note that even with regular specifications, changes to ABC values only would occur when needed, as the ABC remains constant when the stock is above thresholds. In the Management Strategy Evaluation modeling of the framework, the modeling assumed that any time the biomass fell below trigger levels, the ABC would automatically be updated.⁶ Without mandatory specifications, NMFS has the ability to decline to update ABCs even in the event of a stock collapse.

The Council has the opportunity at this meeting to update the scope of the FMP amendment being considered under this agenda item. After 8 years of management discussions leading up to a consensus framework for anchovy management, the Council is poised to establish an anchovy management regime if and only if it adopts the framework in the CPS FMP and implements it through regular specifications. We request that you take this opportunity to amend the FMP accordingly.

Sincerely,

Anna Weinstein
National Audubon

Susan Sheakley

Sea and Sage Audubon

Megan Flaherty
San Diego Audubon

Joe Liebezeit
Portland Audubon

⁴ <https://www.pcouncil.org/documents/2021/06/h-3-a-cpsmt-report-1.pdf/>

⁵ <https://www.pcouncil.org/documents/2021/06/h-3-a-supplemental-cpsas-report-1-2.pdf/>

⁶ Punt 2019.PFMC Agenda Item D.4 Suppl Attach 2. A Further Updated Analysis of the Implications of Different Choices for the Frequency of Updates to OFLs and ABCs for the CSNA.

<https://www.pcouncil.org/documents/2019/11/agenda-item-d-4-supplemental-attachment-2-a-further-updated-analysis-of-the-implications-of-different-choices-for-the-frequency-of-updates-to-ofls-and-abcs-for-the-csna.pdf/>