



Sea and Sage
Audubon Society



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 and Council members:

Audubon California and National Audubon and our 1.2 million members are dedicated to protecting birds and their habitats and connecting people to nature. Our members are passionate about our magnificent array of seabirds that rely on northern anchovy, such as California Brown Pelican (*Pelecanus occidentalis californicus*), California Least Tern, Sooty Shearwater, Pink-footed Shearwater, Rhinoceros Auklet, Common Murre, and more. With our southern California chapter partners we have been engaged at the Council on the central subpopulation of northern anchovy (CSNA) since 2013.

The San Diego Audubon Society is a 3,000+ member non-profit organization with a mission to foster the protection and appreciation of birds, other wildlife, and their habitats, through education and study, and to advocate for a cleaner, healthier environment. We have been involved in conserving, restoring, managing, and advocating for wildlife and their habitat in the San Diego region since 1948, and we have a special focus and connection to the federally Endangered California Least Tern, which we have been helping in San Diego for decades and which relies on forage fish such as anchovy to survive.

Sea and Sage Audubon has strong connections to the appreciation and protection of seabirds such as the endangered California least tern (*Sternula antillarum browni*) and the California brown pelican. In 1964, Sea and Sage helped to establish one of the first protected California least tern colonies, which in 1973 became the first officially recognized breeding tern colony under the Endangered Species Act. Sea and Sage continues to provide volunteers and financial and other support to the Huntington State Beach Least Tern Natural Preserve, as well as outreach and education programs for children and adults on the importance of a healthy ocean ecosystem.

Recognizing the problems inherent in the Monitored and Active approach in the Coastal Pelagic Species Fishery Management Plan (CPS FMP), the Council directed the Coastal Pelagic Species Management Team (CPSMT) to eliminate the management categories through a Fishery Management Plan (FMP) amendment. Scoping for this action is scheduled to take place in November 2021. We encourage the Council to take advantage of the streamlining opportunity presented by the November agenda item, by advancing elements of an updated flowchart management framework at its meetings in June and November.

The current or default harvest control rule for CSNA with its static OFL and ABC does not meet MSA guidelines to achieve Optimal Yield for a critical forage species, does not prevent Overfishing from occurring, has been successfully challenged in court, and has monopolized substantial Council and public attention.

In this spirit, we greatly appreciate the CPSMT's Report 1, which serves two purposes. It provides a helpful review of the history of Council and work group effort since 2016 leading up to the current description of options for a new management structure for CSNA. And, it presents a robust revised management flowchart for the central subpopulation of CSNA including recommendations on parameters for the flowchart. We encourage the Council to advance the flowchart at its June and November meeting, toward updating CNSA management that will be climate-ready, prevent Overfishing, protect dependent predators, and offer certainty and stability to the CPS industry. We are encouraged by the broad support for the revised flowchart and the CPSMT's recommendations for values for its parameters.

At its June meeting, we recommend the Council:

- Adopt the revised flowchart that would provide a simple and reliable means to adjust OFL at regular intervals, and would be well-timed to replace the "Monitored" named management category which the Council directed the CPSMT to remove from the CPS FMP;
- Take steps to amend Council Operating Procedure 9, Schedule 3 to include biennial schedule and specifications for CSNA;
- Take steps to amend the CPS FMP to include the revised flowchart with a biennial regulatory specifications process and eliminate the monitored category. We recommend directing the CPSMT to include the flowchart in its *FMP management categories-scoping* scheduled for November, 2021, along with alternatives for implementing it (e.g. describing values for flowchart parameters).

The CPSMT made a number of recommendations in regard to flowchart parameters. We support:

- The recommendation to use annual ATM surveys to update management parameters, along with any extrapolation or, direct estimate of nearshore biomass.
- The recommendation to schedule and formally consider anchovy stock status in relation to the flowchart at 2-year intervals.
- The recommendation of a short-term biomass of no more than a 2-year average. While a longer 3-year average is recommended by the CPSMT to reduce the noise in the annual estimates, we are concerned that a 3-year average will delay management response in the

event of a collapse, a plausible scenario given the drastic and frequent fluctuation with this population documented in scientific literature.¹

We greatly appreciate Council attention to the need to revise anchovy management in the CPS FMP, and the opportunity in front of us to complete management update for CSNA.

Sincerely,

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¹ E.g., see rapid declines in the time series of Thayer et al. 2017. California anchovy population remains low. 2012-16. CalCOFI Rep., Vol. 58, 2017.