



## CALIFORNIA WETFISH PRODUCERS ASSOCIATION

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May 22, 2019

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

RE: Agenda Item F.3 ~ Pacific Mackerel Assessment and Management Measures

Dear Mr. Anderson and Council members,

On behalf of the members of CWPA and California's wetfish industry, I'm writing to express the serious concerns that I'm hearing from both fishermen and processors regarding the reduction in biomass estimated in the 2019 benchmark Pacific mackerel stock assessment. This leads to a sharply reduced proposed harvest guideline, despite the 'vast' abundance of one to two pound mackerel that albacore fishermen have seen and reported for the past couple of years, breezing near the surface from 30 to 75 miles offshore in the Pacific Northwest.

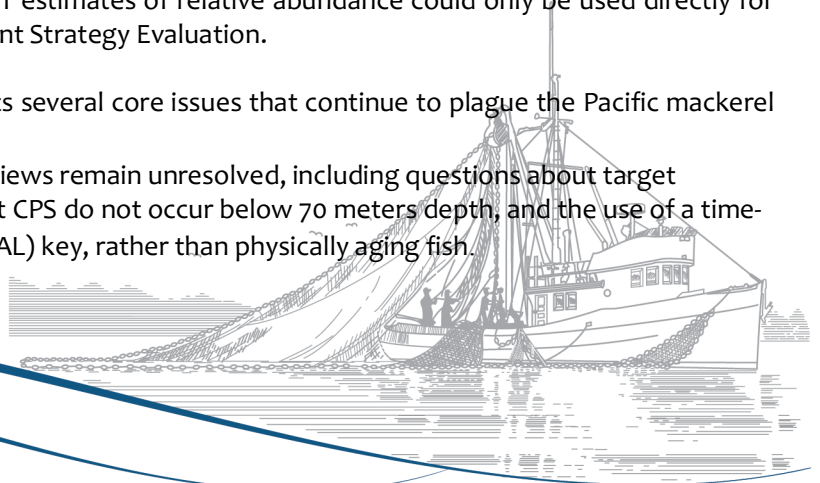
The root of this problem is the continuing deficiencies in Acoustic Trawl (AT) surveys and assumptions. The issues deliberated in this review largely mirror problems experienced at the 2011 and 2015 Pacific mackerel STAR panel meetings, as well as the 2018 Acoustic Trawl (AT) methods review. As the CPS Advisory Subpanel representative on the recent Pacific Mackerel STAR Panel, I highlighted many of the industry's concerns in the CPSAS statement in the STAR Panel Report. We would appreciate the Council's consideration of these comments.

The 2015 benchmark assessment attempted to assess the Pacific mackerel population with a model based primarily on CPFV surveys that didn't report much of the mackerel caught. Including Acoustic Trawl surveys in the 2015 model scaled biomass downward, but provided little information on biomass. Thus, the AT survey was dropped from the 2015 assessment.

This 2019 benchmark now attempts to assess age 1+ biomass with a new Model Alt that is based mainly on the AT survey. However, although the Stock Assessment Team (STAT) strongly advocates for a survey-based assessment, the 2018 AT methods review recommended that AT estimates of relative abundance could only be used directly for management of CPS after conducting a Management Strategy Evaluation.

The CPSAS statement in the STAR Panel Report lists several core issues that continue to plague the Pacific mackerel stock assessment. In part:

- Issues identified at the AT methods reviews remain unresolved, including questions about target strength, the incorrect assumption that CPS do not occur below 70 meters depth, and the use of a time-invariant conditional age-at-length (CAAL) key, rather than physically aging fish.



- There's also the issue that biological composition data, specifically age, are only available from California. Incidental catch data from the whiting fishery are available, but those fish have not been aged, hence age data from the Pacific Northwest beyond the AT survey's CAAL data do not inform the model.

The final straw: there was not enough time during this STAR panel meeting to resolve the conflict in Model Alt between fishery age data, particularly age 0's collected in California fishery landings (but sometimes also in AT surveys), with the time-invariant CAAL key used to assigned age to a relatively small sample size of fish captured in AT surveys. This review struggled with how to down-weight the increase in recruitment of age 0 fish observed in 2018 in light of model sensitivity, and how to fit Model Alt (to the degree possible) to the AT survey.

Although mackerel fishery catches have been relatively low in recent years in California, it is well known that Pacific mackerel are characterized by sharp spikes in abundance, particularly when anchovy are as abundant as they are now. Fishermen are very concerned that the reduced harvest limits prescribed in this stock assessment may be in effect for another four years, with harvest limits declining even further in the meantime. This condition could preclude harvest opportunity if the Pacific mackerel population spikes in the interim. Pacific mackerel are a key alternative fishery in southern California when sardine and market squid are unavailable.

With the closure of the sardine fishery, and a potential decline in squid abundance due to the current El Niño cycle, effort could increase on Pacific mackerel in 2019, if pure mackerel schools are available (the 20-percent bycatch rate soon to be required for incidental catch of sardine will likely preclude fishing on mixed-fish schools). As Council members heard during open public comment, California's wetfish industry is now asking for help under the socio-economic Point of Concern framework to avoid a cascade of bankruptcies and further decline in the CPS fleet.

If the Pacific mackerel fishery expands, either in California, the Pacific Northwest or both places at once, the potential for premature fishery closure exists at the low harvest limit proposed in this stock assessment. This is another compelling reason to develop a systematic aging program that includes mackerel from the full range of the stock, including the Pacific Northwest.

We support the recommendations made in the CPSAS statement in STAR Panel Report:

- Data collection programs need to be substantially expanded to include ageing Pacific mackerel captured incidentally in the whiting fishery, as well as Pacific mackerel captured in the Pacific northwest fishery. This information should be included in the next update assessment.
- AT survey methodology should be improved as recommended in the 2018 AT methods review, including the issues mentioned above.
- Also, AT surveys should increase the spatial boundaries of the survey grid, ideally into Mexico either independently or cooperatively, as well as adding side-looking sonar acoustics to capture fish in the upper water column. Sample size in AT surveys also should be increased.
- Likewise, efforts should be continued to encourage collaborative Tri-national research and data exchanges, and to collaborate with the fishing industry toward improving the knowledge of Pacific mackerel.
- Finally, increased collaboration with industry, both in expanding surveys and acknowledging fishermen's observations of CPS stock presence / abundance on the fishing grounds, and focusing surveys accordingly, would improve the accuracy of future stock assessments.

One further recommendation that we agree is critical, in light of recognized 'spikes' in Pacific mackerel abundance in favorable conditions, is to allow the Council sufficient flexibility to adjust the timing of update reviews and management measures as needed between scheduled benchmark assessments. The Terms of Reference for update assessments also need more flexibility built into the process to enable the STAT, SSC and Council to consider common-sense alternative approaches that are now off limits except in benchmark assessments. These issues are ripe for further consideration under Agenda Item F.2 ~ the Stock Assessment Prioritization Process.

We appreciate the Council's consideration of these concerns and recommendations.

Best regards,

A handwritten signature in cursive script that reads "Diane Pleschner-Steele".

Diane Pleschner-Steele  
Executive Director