

September 6, 2012

Mr. Paul Michel, Supt., Monterey Bay National Marine Sanctuary (MBNMS)
Sanctuary Advisory Council (SAC)

Re: Forage White Paper

Dear Supt. Michel & SAC Members,

My first comment is that there is no one on the Sanctuary Advisory Council, except representatives from the DFG and National Marine Fisheries Service, who are qualified to make detailed comments about the science presented, or the management considerations found, in this forage White Paper. Although I am more familiar than most with the issue, as well as the process by which the Pacific Fishery Management Council (PFMC) and NOAA Fisheries manages these fisheries, I do not feel that I'm qualified to speak to the factual and technical aspects of the White Paper. Because of this, I and several other SAC members asked Dr. Richard Parrish to provide science-based comments. I have attached Dr. Parrish's cover letter, comments, and résumé. He is regarded as a global expert in forage fishes, particularly the Pacific sardine. As you can tell from Dr. Parrish's comments, he thinks the White Paper contains many significant factual errors and omissions regarding the status of forage species and their management. From what I know of this topic, particularly the management, I concur.

I think the main question for the SAC and Sanctuary management is to determine why the Conservation Working Group (CWG) is presenting such a paper. My observation is that it appears that the CWG, led by an Oceana representative, is hoping to move the SAC and the MBNMS into taking a certain position on, or direct management of, forage species in the MBNMS. The information contained in the White Paper is full of spin and omission, and is designed to obtain a protective response (reduce or eliminate harvest) from the SAC and Sanctuary.

This effort on the part of Oceana needs to be put in context. The science arguments that speak to how forage species are managed put forth by Oceana were evaluated by Pacific Fishery Management Council's (PFMC) science and management committees. They were soundly rejected by the PFMC, as not representative of the best available science. Subsequently, Oceana worked with a member of the State legislature to introduce legislation that would embrace their science arguments. This legislation was opposed on many levels for the following reasons: a) it was based on faulty science; b) the State could not afford it; c) it would cost jobs...all for a problem that didn't exist. This bill did not pass the legislature. Following that setback, Oceana sued the Secretary of Commerce and NOAA's National Marine Fisheries Service on the grounds that they were mismanaging coastal pelagic species, based on the same faulty science arguments, hoping that a judge will concur with them that sardines are being over-fished. That case is pending. Now Oceana, through the CWG, is hoping that these

same faulty science arguments will induce the SAC and the Sanctuary to embrace their views and take action.

The “spun” science presented by Oceana would also push the Sanctuary into a direct fishery management role--- something that has never been allowed before. Such a Sanctuary role is not represented in its Designation Document, is not represented in the historic agreement made between fishermen and the Sanctuary about this management role, is not supported by the Sanctuary’s science capabilities, and it is most unwise for a NOAA agency to ally itself with an NGO suing a colleague NOAA agency—the National Marine Fisheries Service. Local forage fisheries (sardines and squid primarily) are the Monterey Bay’s largest fishery by far, employing about 400 workers seasonally. If the MBNMS were to step into a direct management role, or produce recommendations outside of the PFMC science process that demanded a reduction in these fisheries, the relationship between local fishermen and the MBNMS would suffer a serious blow. Moreover, the region’s fishing infrastructure in Monterey and Moss Landing, which is largely supported by these historic “wetfish” fisheries, would be in serious jeopardy of collapse.

It should be expected that the CWG would take positions and advocate for things that they think are in the best interest of their representatives. I have no problem with this at all, it’s their values and their job. However, the pretense is that the forage White Paper is a science document and not an advocacy document. This is just not the case. My recommendation to the CWG regarding the White Paper is to leave it as it is: an advocacy document. Don’t pretend to the SAC that this is a science document, simply designed to inform the public about the status of forage species and their management.

The MBNMS does have a representative on two important PFMC advisory committees. I believe that this is an appropriate place for Sanctuary input into the science and management processes.

If the SAC and MBNMS management wish to make a statement re the status of forage species and their management, I suggest this:

“The MBNMS appreciates the important role that forage species play in the California Current ecosystem and supports the continuing development and use of the best available science in their management by the appropriate fishery management agency.”

Sincerely,

Stephen Scheiblaue
SAC Harbors Representative

