



August 28, 2020

Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

RE: Agenda Item c.7: Future Council Meeting Agenda and Workload Planning

Chair Anderson and Council Members:

With this letter, the Pacific Seabird Group is submitting comments on the Pacific Fishery Management Council's (PFMC) recent decision at the June 2020 meeting to change the management status of shortbelly rockfish (*Sebastes jordani*). Given the importance of the shortbelly rockfish as a forage fish species within the California Current Ecosystem, we are concerned by the decision that conservation and management are no longer warranted. We strongly urge the Council to: 1) add to the November 2020 PFMC meeting an agenda item to scope future management measures for shortbelly rockfish to minimize incidental catch and prohibit directed fishing and 2) clarify the Council's intent to proceed with a stock assessment in 2023, continue monitoring and reporting of incidental bycatch, and continue to include shortbelly rockfish in the Groundfish Stock Assessment and Fishery Evaluation (SAFE) document.

The Pacific Seabird Group (PSG) is an international, non-profit, scientific organization that was founded in 1972 to promote the knowledge, study, and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin. Among PSG's members are biologists and scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and individuals who are interested in marine conservation. PSG members serve as scientific experts and conservation leaders within their local communities, nationally and around the world.

Shortbelly rockfish is an important forage species for other fishes, marine mammals, and seabirds within the California Current Ecosystem. Juvenile rockfish have been found in the diets of 61 predator species within the California Current (Szoboszlai et al. 2015), with young-of-the-year (YOY) shortbelly rockfish being the predominant species consumed by seabirds (Ainley et al., 1993; Warzybok et al., 2018).

As central-place foragers, breeding seabirds rely on availability of high-quality forage (e.g., shortbelly rockfish) in close proximity to nesting locations. Proportions of preferred prey items, such as YOY rockfish, in diets of seabirds show strong correlations with fishery abundance estimates from acoustic surveys (Thayne et al. 2019). Studies link high occurrence and

availability of YOY rockfish with high reproductive success and increases in productivity for sensitive species, such as the federally endangered California Least Tern (*Sterna antillarum browni*) and federally threatened Marbled Murrelet (*Brachyramphus marmoratus*; Robinette et al. 2016, Becker et al. 2007). Conversely, declines in availability of juvenile rockfish have been linked to decreases in both productivity and population sizes for species such as Brandt's Cormorants (*Phalacrocorax penicillatus*; Elliot et al. 2015). Additional diet studies have revealed positive correlations between chick growth and proportions of juvenile rockfish present in chick diet (Thayer and Sydeman 2007).

As important components of dynamic marine food webs, changes in availability of YOY rockfish may cause non-target impacts. For example, offshore breeding seabirds, such as Common Murre (*Uria aalge*), move nearshore in search of northern anchovy when juvenile rockfish are not available in offshore waters. When birds move nearshore, they consume higher levels of out-migrating juvenile salmonids (Wells et al. 2017). We appeal to the Council to consider both direct and indirect effects of shortbelly rockfish abundance on the California Current marine ecosystem.

We request that the Council take the following actions:

1. Add to the November 2020 PFMC meeting an agenda item to scope future management measures to achieve the Council's precautionary goals of minimizing incidental catch and prohibiting directed fishing for shortbelly rockfish, based on the ecological importance of the species. Specifically, we request that the Council direct the Groundfish Management Team (GMT) to work with the Ecosystem Working Group to evaluate possible actions such as trip limits, annual catch limits, in-season management triggers, and other potential to achieve these management goals, along with the appropriate mechanism to implement them [i.e., Ecosystem component designation vs. "in the fishery"].

2. Clarify the Council's continued intent, independent of future management changes, to:

- Include shortbelly rockfish in the Groundfish Stock Assessment and Fishery Evaluation document;
- Have NMFS complete a full stock assessment for shortbelly rockfish in 2023;
- Maintain in-season monitoring and reporting of shortbelly rockfish catch at the same levels as previously provided, and continued inclusion in GMT in-season reports to the Council.

We appreciate the opportunity to provide feedback and recommendations to the Council on the recent change in specification of shortbelly rockfish for the 2021-2022 fishing years. Please let us know if we can provide additional information.

Sincerely,



Peter Hodum  
Vice-Chair for Conservation

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