Pacific Seabird Group

DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

Lisa T. Ballance, Ph.D.
Chair
Southwest Fisheries Science Center
8604 La Jolla Shores Drive
La Jolla, CA 92037
858-546-7173
Lisa.Ballance@noaa.gov

Craig S. Harrison, Esq.
Vice Chair for Conservation
4953 Sonoma Mountain Road
Santa Rosa, CA 95404
(202) 778-2240
charrison@hunton.com

David Irons, Ph.D.
Chair-Elect
U.S. Fish & Wildlife Service
1011 E. Tudor Road
Anchorage, Alaska 99503
(907) 786-3376
david_irons@fws.gov

July 26, 2002

Annette Henry
California Department of Fish and Game
Draft Market Squid Management Plan
Attn: Annette Henry
8604 La Jolla Shores Drive
La Jolla, CA 92037

Re: Comments on Draft Market Squid Fishery Management Plan

Dear Ms. Henry:

On behalf of the Pacific Seabird Group (PSG), thank you for the opportunity to review the draft Market Squid Fishery Management Plan (the "Plan"). PSG is an international non-profit organization that was founded in 1972 to promote knowledge, study and conservation of Pacific seabirds. PSG takes a broad international perspective in recognition that the oceans are tied together by the wandering of seabirds and the flow of ocean currents. Our membership is drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, and the USA. Among PSG's members are biologists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations and individuals who are interested in marine conservation.

The Plan is comprehensive and includes information about ecologically dependent species in the California Current System. PSG wishes to insure that the Plan protects the integrity of California's coastal marine ecosystem. Scientific studies document the importance of market squid as food for most seabird species, particularly during fall and winter when it comprises 50-80% of the diets. Under some environmental conditions such as moderate El Niño events or when other prey are unavailable (e.g., juvenile rockfish), seabirds may switch during the breeding season and consume much of their diets as squid (30-60%). The long-term viability of seabird populations depends on their ability to forage on market squid during fall and winter, and

to be able to switch to market squid during the breeding season during times of food stress. Thus market squid are vital to seabirds in the California Current System.

We understand that the market squid fishery fluctuates in relation to environmental variability, especially as evidenced during El Niño (low availability) and La Niña (high availability) periods when squid are either rare or abundant. With any boom and bust fishery, fishery managers must set yields such that the resource is not over-fished during periods of scarcity. Examples of the misapplication of this approach are unfortunately abundant, such as the Peruvian anchovetta fishery and the Canadian cod fishery in the Atlantic Ocean. Any assessment of the long-term potential yield of a fishery must take fluctuations into account, and surely cannot be equal to the maximum landings (~125,000 MT) during cold-water La Niña conditions such as those in 1999-2001. We disagree with statement in the Plan that the squid stock can sustain a take of 125,000 MT annually because such landings occurred during an anomalous period. To set landings at such a level would be to ignore precautionary fisheries management and to invite ecological disaster. The Plan should discuss and evaluate management tools such as drastically reducing allowed landings during El Niño events. We understand that one panel of experts recommended reducing take to 10,000 MT during such periods, but this recommendation is not publicly discussed or evaluated in the Plan. If regulators believe that a single landing tonnage must be established, it should be based upon long-term data that includes both El Niño and La Niña years and takes into account the requirements of ecologically dependent species such as seabirds. We believe that information exists to develop estimates of the amounts of market squid needed by seabirds and could be developed if the agencies were to focus on this as a priority.

PSG has previously corresponded with the California Department of Fish & Game regarding our concerns with respect to the effects of lights from the squid fishery on threatened and endangered seabirds that nest on the Channel Islands. We believe that the interim management strategy of shielding lights should be fully evaluated and discussed in the Plan and acknowledge that additional resources are needed to study this problem. The squid fishery was responsible for the loss of brown pelicans on Anacapa Island and Xantus' murrelets on Santa Barbara Island in 1999 and possibly more recent years. We believe that the effects of the lights on ashy storm-petrels on Santa Cruz Island and snowy plovers on Santa Rosa Island should be evaluated. Because of the sensitive nature of the breeding colonies in the Channel Island, we recommend closure within one mile of colonies during the breeding season.

PSG appreciates this opportunity to comment on the Plan. While it represents a good effort as a beginning, there are several important data gaps and options that should be discussed and evaluated.

Sincerely,

Craig S. Harrison
Vice Chair for Conservation