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pewtrusts.org

June 7, 2017

Mr. Michael Finley, Chair
Oregon Fish and Wildlife Commission
4034 Fairview Industrial Drive SE
Salem, OR 97302

Re: Exhibit F – Permanent State Regulations for Northern Anchovy Commercial Fisheries

Dear Chair Finley and Members of the Commission:

I am writing on behalf of The Pew Charitable Trusts to express our support for the proposed permanent rules regarding commercial fishing of northern anchovy in the Columbia River. We appreciate the Oregon Fish and Wildlife Commission's (Commission) attention to this issue, and we thank the Oregon Department of Fish and Wildlife (Department) for its work to develop proposed regulations establishing daily trip limits on vessels landing anchovy caught in the Columbia River and its estuary. We request that the Commission approve and adopt these regulations at your June meeting.

Northern anchovy is a keystone forage species in the California Current Ecosystem (CCE) and is preyed upon by a wide variety of marine wildlife, including commercially and recreationally valuable fish, mammals, and seabirds.¹ In fact, scientists have identified northern anchovy as the single most important prey species for CCE seabirds² and first or second most important for the broader suite of marine predators, such as humpback whales, chinook salmon, dolphins, and pinnipeds.³ In addition to its vital role as forage across the West Coast, anchovy also play an important part in the migration of juvenile Columbia Basin salmon. As salmon smolts arrive at the mouth of the Columbia River en route to the Pacific Ocean, they are especially vulnerable to predation by seabirds, seals and sea lions, and larger fish; the presence of schooling forage species, such as anchovy, in the estuary and at the river's mouth provide cover from these predators, and can help ensure that a larger proportion of smolts survive to reach the ocean.

Despite its importance to West Coast marine ecosystems, northern anchovy has received little management or science attention over the last two to three decades. In particular, the northern subpopulation, found off the coasts of Oregon and Washington, has not been formally assessed since the 1970s, resulting in a lack of up-to-date information on the status of the stock. Such an absence of recent data can be especially problematic for short-lived species like anchovy; management measures based on decades-old information may have little relevance for today's populations. This data-poor dynamic, coupled with anchovy's vital role as prey, argues for a

¹ Pacific Fishery Management Council, July 2013, [Ecosystem Initiatives Appendix to the Pacific Coast Fishery Ecosystem Plan](#), at A-11.

² Szoboszlai, A.I., J.A. Thayer, S.A. Wood, W.J. Sydeman, L.E. Koehn. 2015. Forage species in predator diets: Synthesis of data from the California Current. *Ecological Informatics* 29:45-56.

³ Ainley, D. et al. 2015. California current system—predators and the preyscape. *Journal of Marine Systems* 146: 1-2.

precautionary approach to managing the stock. While such an approach is warranted across northern anchovy's full range, the need for precaution can be magnified in a smaller geography like the Columbia River, where the potential for localized depletion, incidental catch of non-target species, and related predator and ecosystem impacts is greater.

As described by the Department in the supporting materials for Exhibit F, concerns regarding these and other impacts intensified in 2016 following a significant spike in landings of the northern subpopulation. After 16 years of *de minimis* landings, last year's catch reached almost 5,600 metric tons (mt), with the majority of the catch coming from an area of the Columbia River upriver of Buoy 10.⁴ Given that the federally-set Annual Catch Limit (ACL) for the entire stock is 9,750 mt, Pew and other conservation and fishing stakeholders noted at the time that the removal of more than 57% of the range-wide ACL from a spatially restricted area such as a 14-mile stretch of the Columbia may increase the likelihood of predator impacts, bycatch, and user conflicts.

To this end, we support the Department's proposed regulations that would apply landing limits in the amount of 5 mt per day and 10 mt per week of anchovy caught by vessels fishing inside the Columbia River. Not only will these regulations reduce possible impacts on dependent predators, they will also help avoid bycatch and reduce predation mortality of threatened and endangered species such as chinook and coho salmon by limiting commercial fishing effort in a critical ecological zone: the mouth of the Columbia.

We also note that the proposed permanent regulations will allow the Department to manage the northern subpopulation with a greater degree of precaution, as described above, appropriate to its crucial role as prey in Oregon's marine waters. In the absence of reliable, updated information regarding the status of the stock, the daily trip limits under consideration will improve the Department's capacity to meet management objectives for northern anchovy, including those shared with federal fishery managers, while allowing for a level of in-river fishing activity consistent with recent catch levels prior to 2016.

In sum, the proposed permanent regulations will help avoid bycatch of other species while leaving enough anchovy in the water as forage for Oregon's treasured salmon, steelhead, whales, and seabirds. We ask that the Commission adopt the Columbia River Anchovy Fishery Trip Limits rule. Thank you for your consideration of our comments, and for your commitment to healthy ocean ecosystems and sustainable fisheries.

Sincerely,



Gilly Lyons
Officer, U.S. Oceans, Pacific

⁴ Oregon Department of Fish and Wildlife, June 2017, [Agenda Item Summary](#) (Attachment 1) for Exhibit F, "Commercial Coastal Pelagic Species (CPS) Fisheries Regulations," page 6.