

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON SMALL-SCALE FISHERY MANAGEMENT FINAL ACTION

The Coastal Pelagic Species Advisory Subpanel (CPSAS) continued the discussion, started last November, regarding options allowing a small directed take of CPS finfish during times when a CPS directed fishery is closed. The CPSAS also considered public comment, including the letters submitted by Ken Bates and Linda Hildebrand, Umpqua Bait, and Scott Creps, all of whom supported the Preliminary Preferred Alternative of a maximum landing of one ton per vessel and one trip per day.

The CPSAS acknowledges and appreciates the desire of small-scale fishermen to continue preexisting high-value fisheries for dead bait and human consumption during fishery closures. The CPSAS supports the Preliminary Preferred Alternative of up to 1.0 mt landing per vessel and one trip per day. Several of our members wish to reiterate that their businesses are suffering during closures, so much so that fishermen are considering seeking a fishery disaster declaration for sardine this year. Allowing a directed open access fishery for CPS finfish (with no additional permit required) during closed periods could encourage new, expanded fishing effort, leading to a significant increase in Pacific sardine landings – not the de minimis landings historically associated with this segment of the fishery.

With that concern in mind, we ask the Council to schedule an annual review of any final action authorizing a small-scale fishery in order to determine whether the initial goals and rationales for such action are being met. Between 2005 and 2015, small scale operations with targeted sardine landings of less than one mt per day had average annual landings of 17.3 mt/year, with a range of 1.4 mt to 47.6 mt per year. A significant departure from these figures would be noteworthy and of concern.

Fishery Management Plan (FMP) Amendment Language and Regulatory Implementation

The CPSAS met jointly with the Coastal Pelagic Species Management Team (CPSMT) to discuss the proposed amendments to the CPS FMP authorizing the directed small scale fishery. We generally support the recommendations proposed by the CPSMT (Agenda Item G.4.a, Supplemental [CPSMT Report 2](#)), with the following modification/recommendation:

- Ensure transshipments (at-sea transfers from catch vessel to another vessel) are not allowed.