

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON UNMANAGED FORAGE FISH PROTECTION

The Coastal Pelagic Species Advisory Subpanel (CPSAS), reiterates our September 2014 recommendation that the Council’s final preferred alternative should be Alternative 2 of the draft Environmental Assessment on Unmanaged Forage Fish Protection (September Briefing Book Agenda Item H.1.a, Attachment 1).

The CPSAS also recommends that jacksmelt should remain a listed ecosystem component (EC) species in the CPS Fishery Management Plan (FMP), in addition to being included with all silversides as a Shared EC species across all FMPs. We note that the CPS Management Team (CPSMT) also made this recommendation in April 2014 (Agenda Item I.1.b, Supplemental CPSMT Report, April 2014).

We see no conflict in listing jacksmelt twice – first as originally identified in the FMP and again as a member of the silversides family in the Shared EC species group. Our reasons for retaining jacksmelt as a listed EC species in the CPS FMP are as follows:

- Jacksmelt is the only species in the group of shared EC species that is encountered in small amounts in CPS fisheries.
- Adding the same language into all of the FMPs for Shared EC Species (September 2014 Agenda Item H.1.a, Attachment 1, pages 68-70), with the exception noted below, would greatly simplify the workload to revise the CPS FMP without changing the intent of the initiative.

The CPSAS supports the edits recommended by the CPSMT to section 5.1.7 (page 70) of the September 2014 Draft Environmental Assessment (Agenda Item H.1.a, Attachment 1, September 2014). The CPSMT recommendation is included in September 2014 Agenda Item H.1.b Supplemental CPSMT Report, September 2014:

~~“As allowed for krill, Shared EC Species could continue to be taken incidentally without violating Federal regulations, unless regulated or restricted for other purposes, such as with bycatch minimization regulations for eulachon recovery. The targeting harvest and transshipment of Shared EC is prohibited. These actions would fully achieve the objectives of the CPS SMP to the extent practicable, but would not account for environmental conditions and the responses of Shared EC Species and other resources to changes in environmental conditions. This prohibition recognizes that de minimis or trace amounts of Shared EC Species may be retained by fishermen while targeting other species; such inadvertent action is not intended to be the subject of this prohibition.~~

The CPSAS notes the purpose of this action is to prohibit **new directed** commercial fishing on the unmanaged species identified in the Ecosystem Workgroup Report (September 2014 Agenda Item H.1.b, Ecosystem Workgroup Report) until the Council has the opportunity to assess scientific information and potential impacts. Page 48 of the draft EA highlights discussion from the April 2014 PFMC meeting: *“the Council also indicated it wanted to allow the currently low levels of incidental catch and retention of shared Ecosystem Component (EC) species to continue without disruption to existing fisheries...”*

Finally, directed artisanal fisheries exist in state waters for some of the Shared EC species. The CPSAS supports wording in the adopted purpose and need statement reflecting this fact: *“This action is not intended to supersede tribal or state fishery management for these species, and coordination would still occur through the existing Council process.”*

PFMC
02/17/15