

## ECOSYSTEM WORKGROUP SUMMARY REPORT ON THE UNMANAGED FORAGE FISH PROTECTION INITIATIVE

At its April 2014 meeting, the Pacific Fishery Management Council (Council) directed the Ecosystem Workgroup (EWG) to revise and make further progress on a draft Environmental Assessment (EA) of a Comprehensive Ecosystem-Based Amendment 1 (CEBA 1) to all four of the Council's fishery management plans (FMPs). Our main report, Agenda Item H.1.a. Attachment 1, includes the following:

Chapter 1, *Introduction*, provides the Purpose and Need statement that the Council updated in April 2014, and a schedule and process for developing CEBA 1, which would bring the following species and species groups into all four of the Council's FMPs as ecosystem component (EC) species:

- Round herring (*Etrumeus teres*) and thread herring (*Opisthonema libertate* and *O. medirastre*)
- Mesopelagic fishes of the families *Myctophidae*, *Bathylagidae*, *Paralepididae*, and *Gonostomatidae*
- Pacific sand lance (*Ammodytes hexapterus*)
- Pacific saury (*Cololabis saira*)
- Silversides (family *Atherinopsidae*)
- Smelts of the family *Osmeridae*
- Pelagic squids (families: *Cranchiidae*, *Gonatidae*, *Histioteuthidae*, *Octopoteuthidae*, *Ommastrephidae* (except Humboldt squid, *Dosidicus gigas*), *Onychoteuthidae*, and *Thysanoteuthidae*)

The above species would be known as "Shared EC Species," meaning that they are shared between all of the FMPs. This action would include these FMP amendments: Amendment 15 to the Coastal Pelagic Species (CPS) FMP, Amendment 25 to the Groundfish FMP, Amendment 3 to the Highly Migratory Species (HMS) FMP, and Amendment 19 to the Salmon FMP.

Chapter 2, *Description of the Alternatives*, summarizes the three alternatives reviewed in the EA:

- Alternative 1 (No Action): future fishery management for unfished and unmanaged forage fish species would be governed by the Federal list of authorized fisheries and gear at 50 CFR 600.725(v).
- Alternative 2 (Preferred): bring Shared EC Species into FMPs and prevent future directed fisheries from developing in Federal waters without scientific information on harvest sustainability and potential ecological effects of the fishery, *incidental retention allowed*. In April 2014, the Council identified this alternative as its preferred alternative.
- Alternative 3: bring Shared EC Species into FMPs and prevent future directed fisheries from developing in Federal waters without appropriate scientific information on harvest sustainability and potential ecological effects of the fishery, *incidental retention prohibited*.

In April 2014, the Council had asked that future EWG documents discuss allowing small amounts of Shared EC Species to continue to be landed without triggering enforcement actions for fisheries participants targeting other species. Under Alternative 2, existing low rates of incidental catch would be allowed to continue, although the development of directed fisheries for Shared EC Species would be prohibited until the Council explicitly allows them to move forward. The EWG recommends adding

Alternative 3 so that the EA could discuss the potential effects of requiring vessels to discard at sea any Shared EC Species that may be incidentally caught during operations targeting FMP species.

Chapter 3, *Status of the Affected Environment*, provides background information on Shared EC species, and on known marine predators of Shared EC Species. Chapter 3 also discusses directed fisheries for Shared EC Species off the U.S. West Coast, if any, incidental catch of Shared EC Species, if known, and worldwide fisheries for these species. Per the Council's April 2014 direction to add new squid families to the action, Section 3.2.1.7 on pelagic squids now includes the families *Cranchiidae*, *Histioteuthidae*, and *Octopoteuthidae*. This chapter has also been revised since April 2014 to add Sections 3.2.2 and 3.2.3 on Council-managed and protected-species predators of Shared EC Species.

Chapter 4, *Impacts on the Affected Environment* is a new chapter and a standard requirement for National Environmental Policy Act analyses. Some sections of this chapter are still in outline format and the EWG anticipates completing these sections in support of the Council's final decision on this action.

Chapter 5, *Consistency with FMPs and Applicable Laws* is only an outline and the EWG also anticipates completing that chapter in time for the Council's final decision on this action.

Chapter 6, *Consistency with the National Environmental Policy Act* is somewhat more complete than Chapter 5, but will also require more work before the Council's final decision on this action.

Chapter 7, *Draft FMP Amendatory Language and Draft Council Operating Procedure 24* provides draft FMP amendment language for each of the FMPs as well as a draft Council Operative Procedure (COP) on a protocol for considering exempted fishing permits (EFPs) for Shared EC Species. Although each of the FMPs has its own format and structure, the draft amendment language in Chapter 7 would alter each of the FMPs in the same way. Chapter 7 draft amendment language for each of the FMPs would: update each FMP's list of FMP amendments, add the Shared EC Species as EC species to each FMP, and revise any relevant FMP discussion of EC species to explain the status of Shared EC Species and the process for evaluating any future fishery for those species through an EFP. The EWG modeled Draft COP 24 on COPs 19, 20, and 23, which are protocols for considering EFPs for the groundfish, HMS, and CPS fisheries, respectively. Draft COP 24 is based on CEBA 1's Purpose and Need for Action, and on the policy the Council adopted in its Fishery Ecosystem Plan Appendix at A.1.1 on developing new fisheries for unfished species.

Chapter 8, *Sources*, lists the references used in the document.

While the EWG welcomes comments on any part of the August 2014 draft EA, we recommend that the Council and its advisory bodies particularly review Chapter 7, FMP amendment language, before the Council's final decision on this action.

PFMC  
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