

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON
UNMANAGED FORAGE FISH PROTECTION INITIATIVE

The Coastal Pelagic Species Advisory Subpanel (CPSAS), along with the Coastal Pelagic Species Management Team (CPSMT) received an overview from Mr. Mike Burner on the draft Environmental Assessment (EA) of the Comprehensive Ecosystem-Based Amendment 1 to the Council's four fishery management plans, and reviewed the draft Fishery Management Plan (FMP) language, including the newly proposed Council Operating Procedure 24.

Preliminary Preferred Alternative

The CPSAS recommends the Council reaffirm the preliminary preferred alternative selected during the April Council meeting, presented in the EA as Alternative 2.

As outlined in Section 1.2 of the draft EA, the purpose of this action is to prohibit **new directed** commercial fishing on these species 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..."* As presently drafted, Alternative 3 would prohibit incidental retention. Additionally, incidental catch of Shared EC species is low in federally-managed CPS fisheries. Incidental amounts of catch would be virtually impossible to detect and sort at sea, making compliance with Alternative 3 unworkable in CPS fisheries.

Alternative 3 would also affect many of the other FMP fisheries. These impacts are outlined in the draft EA as well as in a joint letter submitted as public comment, from the Midwater Trawler's Cooperative, co-signed by organizations representing the majority of harvesters and processors in the CPS and groundfish fisheries on the West Coast. As described in the joint letter, prohibiting retention of Shared EC species will result in increased vessel operational costs, yet provide no direct biological benefit.

In addition, directed artisanal fisheries exist in state waters for some of the EC shared species. The CPSAS reiterates the adopted purpose and need statement, indicating that *"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."*

The CPSAS therefore recommends the Council reiterate its support for Alternative 2 as a preliminary preferred alternative.

Regarding Draft FMP Amendment Language:

The CPSAS commends the Ecosystem Workgroup for the progress that has been made on the EA to date. We have no specific edits to the FMP language at this time, but support the revisions proposed by the CPSMT (Agenda Item H.1.c, Supplemental CPSMT Report). Following inclusion of the CPSMT edits, we recommended forwarding the draft EA for public review.