

ECOSYSTEM ADVISORY SUBPANEL REPORT ON
THE UNAMANAGED FORAGE FISH PROTECTION INITIATIVE

The Ecosystem Advisory Subpanel (EAS) reviewed the Draft Environmental Assessment (Agenda Item H.1.a, Attachment 1) and the Ecosystem Work Group's Summary Report (Agenda Item H.1.b), together with written public comment on this action (Agenda Item H.1.c) and comments from members of the public who attended the EAS meeting on September 12, 2014. We commend the Ecosystem Work Group for supporting the Council's intentions by delivering a well-organized draft environmental assessment. The EAS remains very supportive of this initiative and encourages the Council to continue the path to full implementation.

We respectfully offer the Council the following advice with respect to advancing the Unmanaged Forage Fish Protection Initiative.

The EAS supports Alternative 2 as the preliminary preferred alternative. We support allowing incidental retention of caught ecosystem component (EC) species because it is consistent with the purpose and need statement and poses less burden on existing fisheries than the blanket prohibition on retention featured in Alternative 3.

We discussed the issues related to incidental catch of EC species at length, including discards vs. landings, whether sales should be allowed, and whether EC species catch should be capped. The EAS recommends that the Council not implement management measures to address the disposition of incidental catch at this time.

Fishery-derived data are likely to remain the best available data for assessing trends in EC species catch and relative abundance, so the EAS recommends that data from existing monitoring efforts be compiled and reported on in the annual state-of-the-ecosystem report. Further, we recommend that the data be reviewed periodically to ensure that incidental catch levels are consistent with the Council's intent for the initiative.

The EAS supports the draft Council Operating Procedure 24 for considering Exempted Fishing Permits (EFP) for Shared EC Species, and we accept the responsibility outlined for the EAS to review EFP proposals.

The EAS also supports the draft Fishery Management Plan (FMP) amendments. We note, however, that in a few cases the draft language is slightly inconsistent with the purpose and need statement. For instance, in the Coastal Pelagic Species (CPS) FMP Section 1.1 the proposed amendment reads "...Amendment 15 restricts future development of fisheries..." while the initiative purpose and need statement employs the word prohibit. We recommend using prohibits instead of restricts in the proposed FMP amendment language to be consistent with the purpose and need statement.

The EAS recommends removing the inconsistency in the designation of jacksmelt versus Silversides in the CPS FMP Table 1-2 -- EC species under the CPS FMP -- as jacksmelt fall within the taxonomic grouping of Silversides.