

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON PROTECTING UNFISHED AND UNMANAGED FORAGE SPECIES INITIATIVE

The Coastal Pelagic Species Advisory Subpanel (CPSAS) has closely followed the Council Initiative to protect unmanaged forage fish species. We commend the Ecosystem Workgroup for their hard work and thoughtful analysis of how to progress Initiative One.

A summary of the Ecosystem Workgroup Report on Protecting Unfished and Unmanaged Forage Fish Species Initiative was presented by Ms. Cyreis Schmitt during a joint meeting with the Coastal Pelagic Species Management Team (CPSMT). After reviewing the schedule and process for Initiative One, the CPSAS recommends the following issues be included as research priorities along with the alternatives the Council forwards for additional analysis:

- Accounting for bycatch of unmanaged forage fish species in existing fisheries.
- Addressing catch of these species in current State and recreational fisheries.
- Transitioning species from an Ecosystem Component Species (EC) to an Fishery Management Unit (FMU).

The CPSAS points out that the revised List of Fisheries once amended, will provide additional protections and improve the Council's ability to regulate fishing on these species. As the Council begins Initiative One it is important to recall that the intention of this process was not to prohibit fishing on unmanaged forage fish species outright, but to develop a more formal process should interest arise to develop a commercial fishery on these species. Likewise, the focus is on the establishment of NEW fisheries, not to eliminate small coastal fisheries that currently land some of these species, or to constrain those fisheries in which bycatch occurs incidentally.

The CPSAS highlights these distinctions because there is concern that state fisheries could be unintentionally affected by this Initiative or a roadblock established for developing a new fishery in the future. The CPSAS notes there is no known interest or intention to develop a fishery on these species currently. Regardless, it is important the Council establish an explicit process for developing a new fishery, which should include a clear and well-defined mechanism for transiting species from an EC to an FMU, as appropriate.

Of the alternatives presented for Initiative One in Agenda Item I.1.a, Attachment 1, the CPSAS prefers to see two options under Alternative 2 forwarded for further review and analysis: 2.2.1 Ecosystem Trophic Role Pathway and 2.2.2 Bycatch and Gear Pathway. Alternative 2.2.1 provides a holistic and balanced approach for protecting unmanaged forage species across all of the fishery management plans without requiring additional assessment of species and gear-interactions. Meanwhile, analysis of Alternative 2.2.2 could provide valuable information on current or potential interactions these forage species have with Council managed fisheries. If the Council intends to select a preferred alternative at this juncture, the CPSAS would support selection of Alternative 2.2.1 Ecosystem Trophic Role Pathway.