

ECOSYSTEM ADVISORY SUBPANEL REPORT ON
PROTECTING UNFISHED AND UNMANAGED FORAGE FISH SPECIES INITIATIVE

The Ecosystem Advisory Subpanel (EAS) reviewed the Ecosystem Workgroup's (Workgroup) report (Agenda Item I.1.b, Ecosystem Workgroup Summary Report) regarding Fishery Ecosystem Plan Initiative 1 and have the following observations and suggestions to offer the Council.

The EAS commends the Workgroup for developing this report, which is thorough, informative and well organized. The Workgroup report outlines the purpose and need, the schedule and process, and alternatives for protecting unfished, unmanaged forage fish.

1. List of species. The Council identified "pelagic squid," with the exception of Humboldt squid, as forage fish species to be subject to Initiative 1. The Workgroup chose to interpret that direction to include four families of squid. Public comments have argued that three additional families: *Cranchiidae* (glass squids), *Octopoteuthidae* (octopus squids), and *Histioteuthidae* (cock eyed squids) should also be included. The EAS supports that recommendation on the basis that species in these families are also likely to be forage species for fish managed by the Council.

2. Purpose and need statement. The Workgroup recommends revising the purpose and need statement to more clearly define the action being taken under Initiative 1. The EAS supports the Workgroup's recommended language because it does clarify the intent of the management action you are now considering.

3. Other references to purpose. There are several references in the Workgroup report to the purpose and need for Initiative 1 that omit the language clarifying future conditions under which the Council would consider new, directed fishing on the subject species: "...until the Council has had an adequate opportunity to assess the scientific information relating to any proposed fishery and to consider potential impacts to existing fisheries, fishing communities, and the greater marine ecosystem." These casual references to prohibiting new fisheries may indicate to some that Initiative 1 actions are intended to permanently prohibit fisheries on these species. The paragraph at the top of page 5, just above section 1.3, includes a prominent example. While it would be burdensome to read the entire purpose language each time prohibiting fisheries is mentioned, perhaps a more specific phrase can be used in future documents, such as: "prohibiting new, directed commercial fisheries *until adequate assessments of the science and impacts have been made.*" Or, a footnote referencing the Council's purpose might be used to draw the reader's attention to the full language.

4. Schedule and process. If the Council and Workgroup can enable the Fishery Management Plan (FMP) language associated with Initiative 1 to be reviewed and approved at the Council's November 2014 meeting, then the Council will have completed its work on this Initiative. Arriving at that milestone would support moving to considerations of future ecosystem initiatives at the March 2015 meeting.

5. Preliminary Preferred Alternative. The EAS supports identifying Alternative 2 as a preliminary preferred alternative. Alternative 2 appears to be most in line with the Council's decisions to advance the Initiative, and it will provide significant additional protection for the subject species.

6. Potential pathways to Alternative 2. The EAS favors the Ecosystem Trophic Role Pathway (2.2.1) but suggests that the arguments presented in the Predator-Prey Pathway should also be incorporated into the FMPs in cases where information is adequate to support those arguments. We favor 2.2.1 because a) it articulates the most inclusive view of the importance of the subject species to the ecosystem, b) it makes assigning species and species groups to FMPs very straightforward (all species listed in all FMPs), and c) it will be robust with respect to changes in the ecosystem and trophic relationships. The Ecosystem Trophic Role Pathway acknowledges the indirect effects of predation, which can be important but difficult to track or measure. Scientists on our subpanel noted that trophic relationships are complex and can shift in response to many factors, particularly environmental and ecosystem conditions.

The EAS suggests that Pathway 2.2.2, the Bycatch and Gear Pathway, should not be pursued. It does not explicitly rely on the ecological importance of the subject species as an argument for action, and it assumes the subject species can be correctly classified according to their vulnerability as bycatch in a particular fishery or gear.

7. Rejected alternatives. The EAS supports the Workgroup's suggestion to reject Alternatives 2.3.1 (Bring All Subject Species into the CPS FMP as fishery management unit species) and 2.3.2 (Convert the FEP to an ecosystem FMP). The Workgroup and the Science and Statistical Committee made good arguments to reject 2.3.1 on the basis that available data are insufficient to develop harvest specifications. As the Workgroup pointed out, the Council has previously considered and rejected the option represented by 2.3.2.

8. Impacts on other fisheries. The Workgroup's report flags the potential for Initiative 1 actions to impact certain state and Federal fisheries if the FMP amendments are not carefully crafted (Section 2.0, page 8; Sections 3.3.1 & 3.3.2, pages 23-31). The EAS agrees strongly with the Council's earlier stated intent that this Initiative should not curtail fisheries in state waters or fisheries in Federal waters that have incidental catch of the subject species.

PFMC
04/09/14