

## COASTAL PELAGIC SPECIES MANAGEMENT TEAM REPORT ON SMALL-SCALE FISHERY MANAGEMENT ALTERNATIVES

As the Coastal Pelagic Species Management Team (CPSMT) has previously described (September 2016 Agenda Item E.4.a, CPSMT Report), some very small-scale commercial fishing operations have been negatively affected by the closure of the directed sardine fishery. When the directed fishery was closed, the Pacific Fishery Management Council (Council) provided allowances for incidental landings of sardines by fisheries targeting other coastal pelagic species (CPS) and for fisheries targeting species other than CPS.

The CPS Fishery Management Plan (FMP) provides criteria for establishing incidental catch allowances and live bait fishing allowances for instances when a particular stock is overfished or not overfished (Chapter 5). For Pacific sardine, incidental landing allowances are also set when the stock is not overfished but the biomass is below the Cutoff and the directed fishery is closed. Management measures for incidental landing allowances are typically expressed as allowable percentages of that species in a landing of the dominant species catch. When a directed CPS fishery is closed, these small allowances have allowed for the continued prosecution of the other open CPS fisheries, non-CPS fisheries, as well as the operation of the live bait fishery. The purpose of these allowances is to minimize negative impacts to these other fisheries while meeting conservation goals.

However, some other very small-scale fisheries have been precluded from fishing and/or harvesting even *de minimis* amounts because they are not caught incidental to another CPS species (i.e., within allowances) or the fish are not sold as live bait. These small-scale fisheries sell sardine as specialty dead bait to recreational and commercial fisheries, or for human consumption to restaurants and the public.

The CPSMT proposed amending the CPS FMP, possibly via a regulatory amendment, to provide the Council an opportunity to alleviate the negative impacts to these operations from a directed sardine closure, as well as potential closures of other CPS fisheries in the future.

At its September 2016 meeting, the Council requested that the CPSMT develop alternatives, consistent with the scope described in the CPSMT report (September 2016 Agenda Item E.4.a, Supplemental CPSMT Report 2) for small-scale fisheries for CPS. The Council approved the following elements applicable to all alternatives:

- Include all managed CPS finfish (two stocks of northern anchovy, Pacific mackerel, Pacific sardine, and jack mackerel)
- Include all currently allowed CPS fishing gears
- No additional permits are required
- Landing limits are expressed in terms of a daily and/or trip limit
- Landing limits are one metric ton per trip or less

### Range of Alternatives

The following alternatives include all the elements of the scope adopted above. The main difference between the alternatives is the trip limit amount, which specifies the maximum allowable amount of the CPS for when the directed fishery is closed.

**Alternative 1, Status Quo:** This alternative would retain the existing management approach to small-scale fishing activities, which are allowed when the directed fisheries are open, but are required to shut down when the directed fishery is closed. There would be no *de minimis* landings allowed during a fishery closure for a given stock, aside from existing allowances for incidental catch and tribal harvest.

**Alternative 2, Trip Limit up to 0.5 mt:** This alternative would allow small-scale directed fishing operations to continue even when the directed fishery is closed. It incorporates the elements in the scope as adopted by the Council, and would establish a maximum trip limit of 0.5 mt. The Council would retain the option to establish a trip limit at a level below 0.5 mt for a fishery year.

**Alternative 3, Trip Limit up to 1.0 mt:** This alternative would allow small-scale directed fishing operations to continue even when the directed fishery is closed. It incorporates the elements in the scope as adopted by the Council, and would establish a maximum trip limit of 1.0 mt. The Council would retain the option to establish a trip limit at a level below 1.0 mt for a fishery year.

### Impacts of the Alternatives

The information provided below for the alternatives is based on historical landings for fishing operations negatively affected by the 2015-2016 and 2016-2017 closures of the directed sardine fishery. Directed fishing for other CPS has not been closed and therefore quantitative information for potential impacts is not available. However, fishery closure impacts are expected to be similar, especially regarding the type and number of operations potentially negatively affected, and the magnitude of their potential harvest, should the proposed landing limits of 0.5 or 1.0 mt per trip be allowed for these species. Although landings would be allowed coastwide, data for this type of landing are only available from California and Oregon because such fishing activity has not occurred in Washington, and state licensing provisions will constrain this opportunity. All landings by these small-scale operations would be recorded on fish tickets, and the landings would count toward the annual catch limit (ACL), and therefore would not compromise conservation goals.

**Alternative 1, Status quo:** A few small-scale fishery operations would continue to be precluded from some fishing activities when directed fishing for a CPS was closed. When the directed sardine fishery is closed, some small-scale fisheries, which sell sardine as specialty dead bait to recreational and/or commercial fisheries or for human consumption to local restaurants and the public, are unable to operate or are severely restricted. For example, a unique beach seine fishery targeting CPS to supply bait (dead) for recreational fishers has been unable to operate under the incidental landings allowances during the directed sardine fishery closures. There are no other operations able to supply the desired bait to these recreational fishers. Also, the economic loss to the fishing operation and associated impacts to recreational fishing activity represents an economic loss to the small, local community. Similarly, some operations using hook-and-line gear have curtailed fishing for sardine since the closure of the directed fishery in 2015-2016. Other fisheries,

using a variety of gear types, fish for local restaurants and high end dead bait and also do not meet the criteria to fish during the directed sardine fishery closure. Although these landings represent a small proportion of the total sardine landings, not having the opportunity to fish would continue to significantly impact their livelihood.

**Alternative 2, Trip Limit up to 0.5 mt:** For sardine landings data during the period 2005-2015, the highest total annual landings (29.5 mt) were made in 102 landings by eight operations (at sea and on shore). For this eleven-year period, the average annual total from sardine landings less than 0.5 mt was 10.25 mt per year. The number of participants coastwide ranged between 4 and 10 per year. Under this alternative, fishing activities for these small-scale operations would be significantly improved, although not all activity would be potentially allowed, based on historical landings information. For example, 80 percent of the landings by the beach seine operation since 2005 were below 0.5 mt per trip.

This alternative does not appear to have a negative economic impact to the primary CPS commercial fleet that utilizes incidental set-asides to access other CPS during sardine closures. For example, even if small-scale fishery landings under this alternative were twice the highest level that occurred during the 2005-2015 period, the annual total would be about 60 mt of sardines. Twice the average annual total would be about 20 mt. For comparison, sardine landings totaled about 165 mt during the 2015-2016 directed fishery closure, out of an ACL of 7,000 mt.

**Alternative 3, Trip Limit up to 1.0mt:** For targeted sardine landings of less than one metric ton for years 2005-2015, the highest landing year had 134 landings by 12 operations, totaling 50 mt of sardines. For this period, the average landings that would fall in this category were about 20 mt per year. The number of participants coastwide ranged between about 5 and 12 per year. Under this alternative, a large portion of fishing activities by some of these small-scale operations could be potentially allowed. For example, 95 percent of the landings since 2005 by a beach seine operation were  $\leq$  1.0 mt per trip.

This alternative does not appear to have a negative economic impact to the primary CPS commercial fleet that utilizes incidental set-asides to access other CPS during sardine closures. For example, even if small-scale fishery landings under this alternative were twice the highest level that occurred during the 2005-2015 period, the annual total would be about 100 mt of sardines. Twice the average annual total would be about 40 mt. For comparison, sardine landings totaled about 165 mt during the 2015-2016 directed fishery closure, out of an ACL of 7,000 mt.

PFMC  
10/21/16