## COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON SMALL SCALE FISHERY MANAGEMENT ALTERNATIVES

The Coastal Pelagic Species Advisory Subpanel (CPSAS) met jointly with the Coastal Pelagic Species Management Team (CPSMT) to continue discussion on options to provide for a small directed take of sardine and potentially other CPS finfish during fishery closures. CPSMT member, Ms. Cyreis Schmitt summarized the CPSMT's small-scale landings analysis and purpose, noting that the focus of the request was to provide opportunity for small businesses that had harvested sardine (and other CPS finfish) in "de minimis" amounts to be able to continue targeting CPS finfish, specifically sardine, during directed fishery closures. The intent was to parallel the current allowances provided for live bait and the incidental catch limits allowed for CPS in other fisheries to maintain their other fisheries during closed periods. The CPSAS also considered public comment, including the letters submitted by Umpqua Bait in OR and Ken Bates, a small-scale CPS fisherman in northern California, who supported a daily landing limit not to exceed one metric ton (mt).

The CPSAS acknowledges and appreciates the desire of small-scale fishermen to continue <u>pre-existing</u> high-value fisheries for dead bait and human consumption during fishery closures. However, as we reported in September, several members expressed concern that their businesses also suffer during these closure periods. Further, allowing a directed open access fishery for CPS finfish (no permit required) during closed periods could encourage new, expanded fishing effort in California.

In further discussion at this meeting, CPSAS members expressed concern over potential unintended consequences if new fisheries develop at a time when the sardine fishery is closed. However, acknowledging the CPSMT analysis that only a relatively small number of small-scale landings have occurred over the 10-year period 2005-2015, and there is sufficient leeway in the current annual catch limit (ACL) to allow small directed take without exceeding the ACL, the CPSAS agreed on the following recommendation: to allow small-scale directed CPS finfish harvest with a landing limit of one trip per calendar day, not to exceed one mt per vessel per day. The intent of this small-scale landing limit is to allow existing sardine (and potentially other CPS) fishermen to maintain their high value, low volume fishing enterprises. The one trip per calendar day is intended to discourage multiple trips of one ton each in a given day, which could precipitate unforeseen and unintended consequences.

The CPSAS also recommends close monitoring of small-scale landings and a formal review after the first year, with the potential for the Council to modify the regulation if needed.

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