## COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON REVIEW OF MANAGEMENT CATEGORIES

The Coastal Pelagic Species Advisory Subpanel (CPSAS) reviewed and discussed the Coastal Pelagic Species Management Team (CPSMT) report on management categories (Agenda Item F.4.a, CPSMT Report 1). The Report summarized the Pacific Fishery Management Council (Council) November 2018 request for analysis of a process to remove "Active" and "Monitored" management categories and the Council-recommended Draft Purpose and Need Statement.

The CPSMT reviewed the Council motion and draft Purpose and Need statement and offered an alternative statement for consideration. The majority of the CPSAS support the CPSMT alternative Purpose and Need statement as it clearly addresses the purpose: to consider a process to amend the CPS Fishery Management Plan (FMP) to eliminate perceived confusion over "Active" and "Monitored" management categories. We also agree with the CPSMT's view that the current FMP is compliant with National Standard 1 guidelines, as was determined in Amendment 13, and the FMP as written provides sufficient flexibility to address management needs for all CPS. This includes moving stocks from Active to Monitored status, and that alternative management options are available for stocks in the Monitored category. The Council has discretion to apply different management measures and assessment schedules to all stocks regardless of category.

Recognizing perceived confusion related to management categories and what management is entailed, the CPSMT Report provided three potential options and related timelines to achieve the objectives outlined in the draft Purpose and Needs statement.

The majority of the CPSAS supports Option 1 – retain management categories and names, and revise FMP language as needed to clarify the terms Active and Monitored, and further, to specify that all managed stocks are "in the fishery." This option preserves the current framework structure and requires the least amount of time to accomplish (e.g. six months). An FMP amendment is likely not necessary to modify harvest control rules. We agree with the earlier CPSMT statement (Agenda Item E.5.a, CPSMT Report 1, November 2018), not seeing a strong reason to undertake the large workload that a full-blown FMP amendment would entail, with corresponding workshops to analyze options, revision of regulations, Council Operating Procedures and the Stock Assessment and Fishery Evaluation document to address what is essentially an issue of semantics.

As noted in our previous statement on management categories (Agenda Item E.5.a, Supplemental CPSAS Report, November 2018), moving all CPS stocks to Active management would present major challenges in addition to significant increases in staff resources and time without assurance of improved quality in data. Any management issues can be addressed under the stock assessment prioritization framework process described in Agenda Item F.2, in which we suggested that the CPSMT and CPSAS undertake a review of the assessment schedule on an annual basis. In conjunction with the stock assessment team, this annual review can help determine conditions on the grounds and any need for a change in priorities. We further appreciate the CPSMT's acknowledgement that any potential use of Acoustic Trawl (AT) surveys directly in management would require a Management Strategy Evaluation first.

To enhance the management determination process, we suggest that field surveys be expanded to assess CPS multiple times in the year, at least adding a spring survey to the current summer acoustic trawl (AT) survey, and preferably a fall survey also. And in addition to AT surveys, we support developing multiple indices of abundance, including aerial surveys.

The CPSAS supports the CPSMT housekeeping request to update the FMP by revising operational definitions, improving consistency across sections, and making format revisions.

Finally, the CPSAS recommends that adequate biological sampling occurs for all stocks on a regular schedule, including Monitored stocks.

## **Minority Statement for F.4**

A minority of the CPSAS recommends that the Council initiate an FMP amendment that eliminates the distinction between the Actively Managed and Monitored management categories in the CPS FMP and establishes an annual specifications process for all CPS finfish stocks. This recommendation includes elements of Option 3 from the CPSMT's Report 1 under this agenda item, and features a scope that is consistent with the Council's draft Purpose and Need Statement from its November 2018 motion.

Thank you for your consideration of these comments.

PFMC 06/21/19