

**Berkeley Conservation Institute, Pure Fishing \* Coastside Fishing Club \* Native Fish Society \* Northwest Guides and Anglers Association \* Northwest Sportfishing Industry Association \* Oceana \* Pacific Coast Federation of Fishermen's Associations \* The Pew Environment Group \* Small Boat Commercial Salmon Fisherman's Association \* United Anglers of Southern California**

June 3, 2010

Mr. David Ortmann, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220-1384

RE: F.2 Coastal Pelagic Species Fishery Management Plan Amendment 13

Dear Mr. Ortmann and Council Members:

Abundant populations of forage species are critical for maintaining healthy populations of recreationally and commercially important fish, like tunas, salmon, and others, as well as a healthy and diverse marine ecosystem. Forage species such as sardine, anchovy and smelts are the heartbeat of the ocean, the life giving sustenance that keeps the thousands of species of large food and sport fish alive and robust. Nothing, no other category of fish, determines the fate of our favorite seafood as much as the availability of sufficient forage to keep them healthy and reproductive. Forage fish are the transfer agents. They convert the microscopic phytoplankton and zooplankton into usable protein, protein that the entire upper oceanic food chain depends upon. Take too many forage species and the rest of the marine species are in trouble.

Given the importance of forage species like sardine, squid, anchovy, and krill, managed in the Coastal Pelagic Species Fishery Management Plan (FMP), we are writing to request that the PFMC take actions to amend the FMP to:

- Designate unmanaged forage species as "Ecosystem Component" species and prohibit development or expansion of commercial harvest of those species,
- Bring stocks that are "in the fishery" into compliance with National Standard One guidelines including Annual Catch Limits, Accountability Measures and all required Status Determination Criteria, and
- Designate all Coastal Pelagic Species that are directly targeted for commercial harvest as "in the fishery" and specify annual catch limits and accountability measures, as required.

All of the important sport fish are top level predators. They are at the top of the food chain so a threat to that food chain is a threat to their health and their reproductive potential. The more forage fish that are in the ocean, the more feed for higher order species and more feed means more fish and bigger, healthier fish. Thus, advancing the conservation and management of fisheries targeting forage species, plus taking ecosystem-based approaches that protect other forage fishes, will benefit the sustainability of other recreational and commercial fisheries that depend on healthy forage species populations.

**1. Designate Ecosystem Component species and prohibit directed commercial harvest of those species.**

The PFMC is considering amending the CPS FMP to identify a suite of important forage fish such as smelts, sand lance, lantern fish and others as “ecosystem component” species. We support including these species in the FMP and prohibiting directed commercial harvest to the extent that these important forage species are unmanaged by an existing FMP and not currently the target of commercial fisheries. Direct commercial harvest should be prohibited unless and until the Ecosystem Fishery Management Plan can be developed and it can be demonstrated that directed fishing would not harm the health of the ecosystem and other dependent fisheries.

There is growing concern about the potential for expansion of fishing activity into a suite of forage species that has never previously been fished which would only serve to aggravate the important ecosystem problems caused by poorly regulated forage fisheries. Partly this concern comes from recognizing the pattern of fishing down the food web. Globally, there is a clear pattern of fisheries beginning with top level predators and high value fish only to systematically begin to fish at lower and lower levels of the food web as species are overfished and depleted.

**2. Bring stocks that are “in the fishery” into compliance with National Standard One Guidelines**

As the PFMC considers changes to the management of existing fisheries to prevent overfishing and achieve an Optimum Yield harvest, we request that you adopt all key control measures that limit the overall catch and prevent overfishing, like the maximum catch value (MAXCAT) currently employed in the sardine fishery. We also ask that you adopt measures to implement Minimum Stock Size Thresholds for all species in the fishery.

Importantly, the CPS FMP must be amended to contain an assessment and specification of Optimum Yield (OY), including the other social, economic and ecological factors that will be evaluated in determining OY. The importance of these species for other social and economic uses, including prey for sport fish, other commercial fish, and marine life, must be considered when setting catch levels that provide the greatest overall benefit to the Nation and the protection of the marine ecosystem. For example, when considering OY, we encourage the Council to work with industry in developing fresh food markets for stocks such as sardine and anchovy to maximize the value of the catch for a higher price per pound, not higher levels of landings.

**3. Make certain that all coastal pelagic stocks targeted by commercial fisheries are “in the fishery” with required annual catch limits and accountability measures.**

It has been brought to our attention that an important Coastal Pelagic Species, Pacific bonito, is currently targeted by commercial fisheries, yet unmanaged in any of the existing Council FMPs.<sup>1</sup> Pacific bonito is a coastal pelagic schooling fish found off the coast of North America with concentrations along the U.S. West Coast in southern California. They have been fished

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<sup>1</sup> NMFS Southwest Fisheries Science Center: <http://swfsc.noaa.gov/textblock.aspx?Division=FRD&id=1115>

commercially off California since at least the beginning of the 20<sup>th</sup> century.<sup>2</sup> They are targeted commercially by CPS seine vessels that also take anchovy, sardine and mackerel, troll gear, and they are also taken recreationally. In 2008, commercial vessels landed 1.7 million pounds of Pacific bonito in California.<sup>3</sup> Clearly Pacific bonito need to be classified as “in the fishery” with annual catch limits and accountability measures. As Pacific bonito are caught with CPS gear and, they are important prey to sharks (e.g. shortfin mako, aka. bonito shark), and they are technically a coastal pelagic, we recommend they be included in the CPS FMP.

Thank you for your time and consideration of the importance of managing for healthy populations of forage species.

Sincerely,

Jim Martin, Conservation Director, Berkley Conservation Institute, Pure Fishing

Darrell Ticehurst, Chairman of the Board, Coastside Fishing Club

Bill M. Bakke, Executive Director, Native Fish Society

Bob Rees, President, Northwest Guides and Anglers Association

Liz Hamilton, Executive Director, Northwest Sportfishing Industry Association

Jim Ayers, Vice President, Oceana

Zeke Grader, Executive Director, Pacific Coast Federation of Fishermen's Associations

Steve Ganey, Senior Officer and Director, Regional Fisheries Initiatives, The Pew Environment Group

Mike Hudson, President, Small Boat Commercial Salmon Fishermen's Association

Steven Fukuto, President, United Anglers or Southern California

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<sup>2</sup> Collins et al. 1980. Pacific Bonito Management Information Document. California Department of Fish and Game. Marine Resources Tech Report No. 44.

<sup>3</sup> <http://www.dfg.ca.gov/marine/fishing.asp>