

From: Susan Mates <S.MATES@comcast.net>
Date: Thu, Mar 14, 2013 at 12:04 PM
Subject: Please protect forage fish
To: pfmc.comments@noaa.gov

To the Pacific Fishery Management Council:

As you forge your Pacific Coast Fishery Ecosystem Plan please make sure that forage species are well protected. I know that it must be difficult to satisfy many factions and demands, but as a critical component of the marine ecosystem it is imperative that forage fish are protected. I support your recommendations as a start to this process, and hope that you will ensure a balanced and productive marine food web by setting aside forage species that aren't currently protected.

Thank you,
Susan Mates
8945 NW Oak Street
Portland, OR 97229

From: Diane Livia <dianelivia@sbcglobal.net>
Date: Fri, Mar 15, 2013 at 2:26 PM
Subject: Adopt the Fishery Ecosystem Plan and Accompanying Ecosystem Initiatives -- Help preserve our Oceans
To: pfmc.comments@noaa.gov

Mar 15, 2013

Chairman Wolford and Council Members

Dear and Council Members,

It is vital for the future diversity of our planet, which is a one-to-one indicator of human well-being, that our oceans are not overfished, and that farmed fish are not fed fish from our oceans.

Because good planets are hard to find.

Thank you for agreeing to develop a Fishery Ecosystem Plan. Please adopt the plan and accompanying list of Ecosystem Initiatives in April.

I am a life-long West Coast resident.

The entire population of humankind benefits from a vibrant ocean.

A sustainable earth depends on a well-functioning marine food web.

The Council itself recognized forage fish as the cornerstone of a healthy ecosystem last June, when it set a goal of prohibiting new fisheries on forage species that aren't currently managed. And the Council has a chance to establish itself as a leader in moving ecosystem-based management from theory into practice.

It only makes sense for the Council to follow through on its mission by enacting firm protections for forage fish that are vulnerable to unregulated fisheries emerging at any time -- as its first official ecosystem initiative.

As a human who has as much right to the ocean as the Council, and as much or more concern for it, I demand you to take this precautionary measure as soon as possible.

The Council's own analysis, conducted in 2011, noted that industrial demand for forage fish is likely to grow more intense because of its value as a global commodity used in feeding livestock, poultry and farmed fish. The Council's top priority should be to make sure it protects forage fish as the linchpin of healthy existing fisheries and coastal communities here on the Pacific coast.

Sincerely,

Diane Livia
6445 Colby St
Oakland, CA 94618-1309

Subject:Item H, Forage Fish
From:Donald Niskanen <dwn@peak.org>
To:pfmc.comments@noaa.gov
Cc:

Dear PFMC,

No regulations and lack of enforcement of regulations have seriously depleted some of our ocean fish stocks. Public pressure and increased enforcement have stopped this tide, but our fish stocks are far from normal numbers. Not regulating or banning the capture of "forage fish" will only reverse any positive attempts the PFMC has done to protect our game fish. This food web is very delicate and any destruction of the lower rungs, do not bode well for the larger species.

The PFMC seems to be headed in the right direction in protecting and regulating the demise of the forage fish.

I support strong regulations that protect these species and ensure a food source for our larger species.

Our generation is not totally responsible for what has happened to our ocean resource. It started long ago. But we are on the edge and very responsible for positive changes on how we treat this resource and protect it for future generations.

I have long been a proponent of banning all fishing on streams that only hold wild fish, even catch and release is a threat to our wild species. Once fish numbers reach a sustainable level, maybe fishing could be allowed. But we just don't have the enforcement to cover all of our streams and fishing boats.

Thank You,

Donald W. Niskanen
Yachats, OR

From: F. J. Taylor <fjtusmc@gmail.com>

Date: Sun, Mar 17, 2013 at 2:07 PM

Subject: Forage fish stocks

To: pfmc.comments@noaa.gov

Sir or Madam,

As NOAA is aware, the forage fish stocks are a critical food source for everything above them on the food web. As NOAA is also doubtless aware, they are in critical status in many places.

With the Fishery Ecosystem Plan for public comment, the Pacific Fishery Management Council has a chance to move ecosystem protection from theory into practice. The Council's June policy objective was to prohibit new fisheries targeting currently unmanaged forage fish because of their role in sustaining a healthy ocean food web.

Likewise, the California Fish and Game Commission adopted a similar policy for state waters within three miles of California's picturesque beaches. However, the best of intentions mean very little without action to back them up.

It's time to enact firm measures to sustain the Pacific marine ecosystem, starting by protecting the ocean food web. Please help move this plan to action. I will be contacting my legislators to help gain support for this plan.

Sincerely,

FJ Taylor
USMC (Ret.)

From: **Nic Callero** <calleron@nwf.org>
Date: Tue, Mar 19, 2013 at 7:23 PM
Subject: Agenda Item H 1
To: "pfmtc.comments@noaa.gov" <pfmtc.comments@noaa.gov>

Pacific Fishery Management Council
Attn: Dan Wolford, Chair
7700 N.E. Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Re: Agenda item H.1, Adoption of the Pacific Coast Fishery Ecosystem Plan

Dear Chairman Wolford and Council Members:

I am writing today in support of the Council's Fishery Ecosystem Plan (FEP). The National Wildlife Federation is America's largest conservation organization representing over 4 million members and supporters nationally. We work to inspire Americans to protect wildlife for our children's future. We serve as a voice for wildlife, advocating for strong, scientifically sound policy that protects habitat and natural resources.

Our Pacific regional office of NWF covering California, Oregon, Washington and Alaska represents over 527,000 members and supporters dedicated to conserving healthy populations of fish and wildlife for our children's future.

By working to protect and defend wildlife and the wild places they need to survive, NWF helps maintain the integrity of the nation's natural heritage, and enables the continued enjoyment of cherished hunting and angling traditions with a special focus on getting kids outdoors.

As you know Forage fish are an important link in the ocean food chain being consumed by large fish like tuna, cod, endangered salmon and steelhead, seabirds like the endangered marbled murrelet, dolphins and other marine mammals. The availability and abundance of prey in the ocean is directly linked to the success of these species-many of which face a myriad of other obstacles that threaten their declining numbers.

NWF extends its thanks to the Council for taking action in November to adopt the preliminary draft Pacific FEP and release it for public review. We appreciate the Council's decision recognizing forage fish as the cornerstone of a productive marine ecosystem along the Pacific coast. We ask that you keep on track to fulfill your commitment to prohibit new fisheries targeting forage species that aren't yet being fished, starting with adoption of the FEP.

With the threat of global warming and ocean acidification, it is imperative that we safeguard against these impacts by securing an abundant and diverse prey base in the ocean. Protecting currently unmanaged forage species is a sensible management objective that will ensure we leave enough food in the ocean for salmon, steelhead, tuna, marine mammals and seabirds.

As a fisherman, outdoorsmen and conservationist, I appreciate the Council's recent steps toward ecosystem-based fisheries management and support the Council's efforts to maintain a vibrant marine ecosystem off our west coast. We believe the Pacific Council can be a national leader in advancing ecosystem-based principles in resource management.

Thank you for providing an opportunity for the public to comment. We look forward to tracking your progress and engaging on these important issues.

Sincerely,

Nicholas Callero ><(((°>
National Wildlife Federation
Regional Outreach Coordinator
C: [503.977.5467](tel:503.977.5467) O: [206.577.1415](tel:206.577.1415)

The following comment is indicative of 39 such comments received for the April 2013 Briefing Book

Date: Wed, Mar 6, 2013 at 1:55 PM

Subject: Forage fish

To: pfmc.comments@noaa.gov

Dear PFMC Chair Wolford and Executive Director McIsaac,

Thank you for agreeing to develop a Fishery Ecosystem Plan. Please adopt the plan and accompanying list of Ecosystem Initiatives in April.

As an angler in the Pacific Northwest who benefits from a vibrant ocean, I believe a sustainable ecosystem depends on a well-functioning marine food web. The Council itself recognized forage fish as the cornerstone of a healthy ecosystem last June when it set a goal of prohibiting new fisheries on forage species that aren't currently managed. Now, as its first official ecosystem initiative, it makes sense for the Council to follow through by enacting firm protections for forage fish that are vulnerable to unregulated fisheries emerging at any time. In doing so, the Council has a chance to establish itself as a leader in moving ecosystem-based management from theory into practice.

I encourage you to take this precautionary measure as soon as possible. The Council's own analysis, conducted in 2011, noted that industrial demand for forage fish is likely to grow more intense because of its value as a global commodity used in feeding livestock, poultry and farmed fish. The Council's top priority should be to make sure it protects forage fish as the linchpin of healthy existing fisheries and coastal communities here on the Pacific coast.

Sincerely,

James Bennett

bennhaus@comcast.net

Vancouver, WA

RECEIVED

3-15-2013

MAR 18 2013

To: **PFMC** Pacific Fishery Mgmt. Council

Re = Fishery Ecosystem Plan

Dear Sirs -

As an involved citizen of marine and bird lover, I want to thank you for acting prudently to set limits on existing already-managed fisheries.

It is important to the environment and the society that you adopt the Fishery Ecosystem Plan at your April 2013 meeting.

We need to have Fish Management Plan.

level of protection for unmanaged forage

fish. This will greatly protect our

marine and bird resources.

Thank you for your support.

Goran Bailey -

Pacific Fishery Management Council
Dan Wolford, Chairman
7700 N.E. Ambassador Place, Suite 101
Portland, Oregon 97220-1384

March 4th, 2013

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MAR 13 2013

Dear Chairman Wolford and Council Members,

As outdoor enthusiasts and fishermen who care about a productive ocean, we ask that you fulfill the commitment you made a year ago and implement measures to prohibit unregulated fisheries targeting forage fish on the West Coast. It is time for the Council to act.

Fishermen know that bait in the water translates to fish in the boat.

Forage fish form the key link in the marine food web on the Pacific coast, by eating plankton and converting it into protein for bigger fish, seabirds, and marine mammals. Healthy and robust populations of game fish such as salmon, tuna and ling cod, in turn, support a recreational fishing sector that employs over 18,000 people and generates \$2.2 billion in annual spending on saltwater fishing and equipment in California, Oregon and Washington.

We also know that wild-caught forage fish is a global commodity, and that worldwide demand is rising to use it for purposes such as feeding livestock, poultry and farmed fish overseas.

We believe the Council's top priority should be to leave enough of these food fish in the water to sustain a balanced and productive marine ecosystem here on the Pacific coast. We are encouraged that the Council has stated its intention to prohibit new fisheries targeting currently unmanaged forage fish such as sand lance, saury and smelt until management plans are in place that fully assess the impacts of any fishing on the ocean food web. Now we ask the Council to fulfill its commitment and put in place management measures to protect these and other important forage species that are vulnerable to unregulated fisheries.

We appreciate the attention the Council has given to forage fish conservation efforts throughout the development of your ecosystem plan. By acting now, the Council has a chance to help ensure a healthy Pacific Ocean for generations to come.

Sincerely,


*Karen L. Coulter, Director,
Blue Mountains Biodiversity Project*



TU Celebrates 50 Years of Protecting Cold, Clean, Fishable Water.

Oregon Council Trout Unlimited

March 18, 2013

To Pacific Fishery Management Council-

Concerning Agenda item H. 1-Ecosystem based Management-

The Oregon Council Trout Unlimited urges the Council to adapt the Pacific Fishery Ecosystem Plan at the April 2013 meeting. We feel that adopting a well designed FEP is a major step forward in a national transition to an ecosystem -based approach to fisheries management. The top priority of the FEP should be to ensure a healthy ecosystem, and a key part should be to protect the marine food web upon which it depends.

Following the final adoption of the FEP, the Council should move to its first ecosystem based initiative starting the process of providing FMP level protections for unmanaged forage fish. The Council is in the first phase of the initiative- to update the Pacific Fishery Management Council's list of Authorized Fisheries and Gear- is underway. This is not enough to accomplish the Council adopted objective of the initiative.

To make this happen, additional protection for unmanaged forage species must be implemented through a Fishery Management Plan amendment process as called for in the Council's June 2012 motion which started the initiative.

So the Oregon Council TU is supportive and appreciative of the steps in this process you have already taken, such as taking action in November to adopt the preliminary draft Pacific FEP and release it for public review. But this is only the first step and we urge the Council to continue on the path it started on this FEP process.

Sincerely,

Tom Wolf, Chair
Oregon Council Trout Unlimited



OREGON CHAPTER SIERRA CLUB

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March 19, 2013

Mr. Dan Wolford, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Ste. 101
Portland, Oregon 97220

Re: Agenda Item H.1, Public Comment on Pacific Coast Fishery Ecosystem Plan

Dear Chairman Wolford and Council members:

I write today on behalf of our 20,000+ members and supporters in Oregon to urge the Council to adopt a final Fishery Ecosystem Plan and start the process toward providing additional protections for unmanaged forage species through a Fishery Management Plan amendment.

The Oregon Chapter of the Sierra Club is a non-profit member-supported, public interest organization that promotes conservation of Oregon's natural environment by influencing public policy decisions—legislative, administrative, legal, and electoral. We have worked to protect Oregon's environment and natural resources since 1978.

We appreciate the Council's move toward ecosystem-based management and believe this is a major step forward in the national transition to an ecosystem-based approach to fisheries management by allowing ecosystem principles to be incorporated in to the decision making process. The top priority of ecosystem planning should be to ensure a healthy ecosystem and the first step should be to protect the marine food web upon which that ecosystem depends. Following adoption of the Fishery Ecosystem Plan in April, the Council should proceed immediately with its first ecosystem-based initiative by beginning the process of providing FMP-level protections for unmanaged forage fish.

We look forward to engaging throughout this process. Thank you for your consideration.

Sincerely,

Rhett Lawrence
Conservation Director
Oregon Chapter, Sierra Club



Port Orford Ocean Resource Team

PO Box 679
351 W 6th Street
Port Orford, OR97465
P: 541.332.0627
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info@oceanresourceteam.org
oceanresourceteam.org

March 18, 2013

Mr. Dan Wolford, Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

Dear Mr. Wolford:

The Port Orford Ocean Resource Team (POORT) is a non-profit organization based in beautiful Port Orford, Oregon. At the directive of our board of five local commercial fishermen, we are dedicated to maintaining access to natural resources by people who are fishing selectively, while promoting sustainable fisheries and protecting marine biological diversity. We operate on the triple bottom line: ecology, equity and economics. Our organization combines science, education, conservation, and local knowledge to help our community continue to access healthy, local fisheries. We believe that with proper management and conservation strategies there is a future in fishing at Port Orford and look forward to our children and grandchildren following in our footsteps.

Our community came together to engage in the marine reserve process to have a local say and carve out benefits for Port Orford. In addition, we recently launched a Community Supported Fishery, allowing people from around the state to share in supporting our local fishermen and our sustainable fishing model.

I am writing to you today to express my support of the Council's Fishery Ecosystem Plan and urge the Council to adopt the plan at the April meeting in Portland. The top priority of the Fishery Ecosystem Plan should be to ensure a healthy ecosystem and the first key step should be to protect the marine food web upon which it depends.

Forage fish play a critical role in sustaining a vibrant Pacific Ocean and make up the cornerstone of ocean food webs. Forage fish are vital to well-functioning marine ecosystems. There is huge commercial value to be maintained by leaving forage in the water as food for bigger more lucrative fish, not to mention the benefit of maintaining an especially vibrant marine ecosystem that supports whale-watching, birding, recreational fishing and other forms of eco-tourism. The Lenfest Forage Fish Task Force Report



Port Orford Ocean Resource Team

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concluded that forage species are worth almost double as supportive value to other commercial fisheries as compared to their value as direct catch.

I am pleased that the Council will consider unmanaged forage species protection under the first ecosystem initiative at the June Council meeting and encourage the Council not to delay in working on this initiative. I urge the Council to take action to ensure that forage fish are adequately protected so that they continue to provide essential food for the marine life we catch, eat and watch at Port Orford.

Our commercial fisheries depend on you taking action to adequately protect the marine ecosystem. Thank you for your attention to this important issue.

Sincerely,

A handwritten signature in black ink that reads "Leesa Cobb". The signature is written in a cursive, flowing style.

Leesa Cobb
Executive Director



March 19, 2013

Dan Wolford, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, #101
Portland, OR 97220

RE: Agenda Item H.1.c - Pacific Fishery Ecosystem Plan (FEP) And FEP Initiatives Document

Dear Chairman Wolford and Council Members,

We write to express our support for the Pacific Fishery Management Council's (Council) development of a Fishery Ecosystem Plan (FEP). We urge the Council to take final action at its April meeting to adopt the FEP and to begin implementation of ecosystem-based initiative #1 – the protection of unmanaged forage species. Taking this action will firmly establish the Council as a leader in the national transition to an ecosystem-based approach to fisheries management.

Overview Of FEP Requests

This letter includes our organizational comments on the FEP document itself as well as our comments on the ecosystem-based initiative process and corresponding proposed initiatives. Our main requests regarding these two documents and the FEP process moving forward are summarized below:

- Take final action at the April meeting to adopt the Pacific FEP.
- Begin implementing ecosystem-based initiative #1 - protecting unmanaged forage species - according to the process described in the appendix, starting with formation of the *ad hoc* committee as stated in the Council's November 2012 FEP motion.
- Develop a schedule and process for assigning ecologists to stock assessment teams, starting with Coastal Pelagic Species due to their unique role as prey.
- Establish an annual index of forage abundance and diversity as part of every Annual State of the Ecosystem Report, and work to develop forage thresholds that reflect the Council's ecosystem goals and objectives
- Include removal of the non-Fishery Management Plan (FMP) seine fishery for Pacific saury along with the proposed revisions to the List of Authorized Fisheries and Gear included in FEP appendix.

- Clarify the reasoning behind combining the two initiatives called for in the November 2012 motion (Groundfish Amendment 24 process and development of a core list of ecosystem indicators).¹

Below please find our more detailed comments on the FEP.

Draft FEP and the November 2012 Motion

We are pleased with the progress that the Council has made on the FEP in general and are optimistic about the ways in which it will enhance and improve existing fisheries management by bringing more ecosystem science, broader ecosystem considerations and coordinated management policies to the table.² In particular, we are heartened to see that the recommendations we provided in our public comment³ at the November 2012 Council meeting have largely been incorporated into this version of the FEP released for public review. These recommendations included:

- An explicit reference to Optimum Yield (OY), as defined by the Magnuson-Stevens Fishery Conservation and Management Act (MSA), in the Objectives section of the FEP. The FEP will be a critical part of advancing the assessment and utilization of OY within the Council's management process.
- Monitoring the status of the forage base as part of the FEP's Annual State of the Ecosystem Report.⁴ As stated above, this ecosystem indicator should be assessed annually as part of the Report.
- Prioritizing protection of the marine food web by laying out a process to protect unmanaged forage species through implementation of FEP initiative #1.

We are also pleased with the motion that passed unanimously at the November 2012 Council meeting to adopt the preliminary draft FEP for public review. Moreover, we support the changes to the FEP called for in the motion as they improve upon the draft presented at that meeting.⁵ These changes include:

- Decoupling the Ecosystem-Based initiatives section from the FEP and instead creating a stand-alone initiatives document as an appendix to the FEP in order to allow for annual review of and changes to the initiatives document.

¹ PFMC. November 2012. Supplemental WDFW Motion. Agenda Item K.1.e.

² PFMC. June, 2012. Draft Pacific Coast Fishery Ecosystem Plan. Agenda Item H.1.a. Page 2

³ See Pew Charitable Trusts public comment at November 2012 meeting. Agenda Item K.1.d, Page 1.

⁴ PFMC. November 2012. Draft Annual State of the California Current Ecosystem Report. Agenda Item K.3.a.

⁵ PFMC. November 2012. Draft Pacific Coast Fishery Ecosystem Plan. Agenda Item K.1.a

- Adding a section to the FEP that describes the process for implementation and/or modification of the initiatives and clarifies that the initiative process remains under the umbrella of the FEP
- Inclusion of the draft list of Lower-Trophic-Level species from Appendix A⁶ of the November 2011 version of the FEP under initiative #1 in the stand alone document.
- The addition of two new proposals to the initiatives document; the first to analyze the cumulative impacts of fisheries on the ecosystem, pursuant to the National Environmental Protection Act (NEPA) and the MSA; and the second to develop a core suite of indicators to track through the Annual State of the Ecosystem Report. Under section A.2.9 of the initiatives document, these two proposals are combined into a single initiative.

Decoupling the initiatives document from the FEP itself enables the Council to develop and implement the ecosystem-based initiatives without having to revisit or modify the FEP document itself. This allows the Council to respond quickly and effectively to new information or science that can have a direct and beneficial impact for its managed fisheries, while keeping the ecosystem-based initiative process under the umbrella of the FEP itself. For example, proceeding now to implementing initiative #1 and addressing the decisions that need to be made under that process does not require amendments or changes to the actual FEP.

The addition to the FEP of language linking the initiatives document to the FEP itself will help to clarify and make explicit to all stakeholders the process by which the Council will consider, develop and implement the initiatives. It also specifies how new information and/or proposals from the public will be considered by the Council and its advisory bodies for inclusion in the initiatives document. As the Council seeks to increasingly incorporate ecosystem science into the management framework, having stakeholders from all perspectives on the same page as far as process will reduce confusion, shorten timelines and increase effective implementation of the ecosystem-based initiatives in order to better ensure sustainable management of our fisheries.

We were also pleased that the motion directed the Ecosystem Plan Development Team (EPDT) to re-insert the draft list of Lower-Trophic-Level species from Appendix A⁷ of the November 2011 draft FEP under initiative #1 in the stand alone initiatives document. While we acknowledge that the draft list is preliminary and will need to be vetted by the EPDT, the Ecosystem Advisory Subpanel, the ad-hoc committee⁸ called for in the motion and the Science and Statistical Committee, it is an appropriate starting point for discussion of what species may be eligible for protection under initiative #1. Furthermore, inclusion of this list in the initiatives

⁶ PFMC. November 2011. Draft Pacific Coast Fishery Ecosystem Plan. Appendix A. Agenda Item H.2.a.

⁷ *Ibid.*

⁸ PFMC. November 2012. Supplemental WDFW Motion. Agenda Item K.1.e.

document helps to frame the context of this issue and offer reassurance to industry stakeholders that initiative #1 will not have negative impacts on the Council's managed fisheries because the initiative only addresses species which are not currently being targeted by fisheries.

The Final FEP As Released For Public Comment

This FEP is a solid first step in starting to bring ecosystem science into the Council decision making process, thereby helping to transition from a single-species perspective to an ecosystem-based approach. While the Council has made it explicitly clear that this FEP is meant to be an informational document and that any effect on management decisions is solely at the discretion of the Council⁹, we believe that the informational products of the FEP will help improve the overall process and lead to better informed decisions firmly grounded in the best available science, particularly regarding cross-FMP actions intended to address ecosystem-level concerns.

The FEP document does a great job of providing crucial information about the FEP's purpose and objectives, the California Current Large Marine Ecosystem and all that it contains, current and historical West Coast fisheries, human and environmental impacts on the ecosystem, the Council's policy priorities, and lastly how ecosystem information can be incorporated into the management process.

In particular, chapters 4 (on the effects and uncertainties arising from human activity and environmental shifts) and 6 (on the incorporation of cross-FMP and ecosystem science into the Council process) provide information that is useful in considering how the Council can start to make decisions within an ecosystem context. After providing a broad but detailed description of the California Current Ecosystem in Chapter 3, Chapter 4 looks at how changes in human activity can affect the ecosystem and vice-versa, including the effects of climate change on both marine life and human activity. With regard to the removal of fish from the ecosystem due to fishing activity, this chapter demonstrates how the cumulative impacts of various fisheries interact to cause both direct and indirect effects up and down the marine food web. Furthermore, while the FEP acknowledges that there are but a few examples of comprehensive scientific efforts to analyze the cumulative effects of fishing on marine ecosystems, there is progress being made in this area, especially with respect to the ecological and economic effects of fishing on low trophic level (forage) species.¹⁰

Chapter 6 provides a discussion of how ecosystem information can be brought into the Council decision making process. There are two main points of entry for such information to be

⁹ PFMC. November 2012. Supplemental WDFW Motion. Agenda Item K.1.e.

¹⁰ PFMC. February 2013. Pacific Coast Fishery Ecosystem Plan. p. 137.

considered and incorporated. The first is by including ecologists and/or ecosystem scientists on the Council's stock assessment teams. This is a natural and obvious step in shifting to an ecosystem approach. Having ecological expertise on stock assessment teams can help by including ecosystem information (predator-prey interactions, climate and habitat impacts, natural mortality, recruitment variability, etc.) within the assessment document itself. As time series are developed and causal relationships identified, this information will become increasingly relevant for decision makers. As noted in the FEP, stock assessment models that explicitly include ecological considerations can also be developed with such expertise on the assessment teams by incorporating ecosystem-based model parameters, adding ecological indices and/or variable population dynamics. As assessment models become increasingly able to incorporate ecological considerations, decision matrices can be developed to provide decision makers with the likely ecological effects of alternate management strategies. We support moving forward with this endeavor in the near term and request that the Council prioritize bringing ecosystem science into stock assessments according to the process laid out in Chapter 6 of the FEP.

The second point of entry for bringing ecological information into the management framework is through the FEP's Annual State of the California Current Ecosystem Report. This report will ideally provide the Council with an ecosystem context within which to decide how to set annual catch limits and other make important management decisions. We were pleased with the draft Annual Report presented to the Council in November of 2012 and suggest that this format and the core indicators included in it be adopted for future reports.

Specifically, we support the use of a forage indicator, as a stable and ongoing component of the Annual Report, which monitors and tracks the overall status of the California Current forage base, including indices of both forage abundance and forage diversity. As this time series is developed, as ecosystem science expands and predator responses to prey availability are identified, we encourage the Council to establish benchmarks or thresholds of forage abundance against which the forage indicator may be assessed and which are consistent with the Council's ecosystem goals and objectives. Taken as a whole, the ecosystem indicators presented in this initial Annual Report constitute a good start, and we discuss below how to move forward on refining the suit of indicators to best inform management of the Council's FMPs.

Cross-FMP Ecosystem –Based Fisheries Management Initiatives

With the initiative process proposed through the FEP, the Council has an ideal framework in place to begin the evolutionary, incremental process of putting ecosystem-based management into practice. The process described in the FEP allows the Council to be flexible in selecting which initiatives it wishes to pursue according to fishery and ecosystem needs while at the

same time enabling the Council to respond to new information and data quickly, with the understanding that any management implications remain at the discretion of the Council. Our comments below focus primarily on initiative #1, then go on to address the other initiatives described in the appendix.

Initiative #1 – Protection of unmanaged forage species

Upon final adoption of the FEP in April 2013, we urge the Council to begin implementation of initiative #1, according to the process described in the stand-alone initiatives document and per the Council motion¹¹ passed in June 2012 establishing the management objective to prohibit new fisheries on unmanaged forage species until it has a chance to assess the science behind the fishery and any potential impacts to the broader ecosystem. As noted in the initiatives document, the Council has discussed how to best implement protections for unmanaged forage species over the course of several years and has developed a clear path forward through an FMP amendment process. With that in mind, we offer the following comments specifically regarding FEP initiative #1.

The description of the initiative provided in the stand-alone document describes a “two-stage process” for establishing protections for unmanaged forage species. The first step is to revise and update the federal List of Authorized Fisheries and Gear for the West Coast (List), which would implement a notification requirement for any potential new fishery. The second step is to develop additional necessary protections through an amendment to one or more of the Council’s FMPs.¹² Regarding this two-stage process, the description in the stand-alone document states:

By modifying the list of authorized fisheries and gear, and by adopting a policy on the development of new fisheries in the West Coast EEZ, the Council better prepares itself for a potential future new fishery proposal. However, those actions would not wholly prohibit new fisheries from developing without Council consultation. Therefore, the second stage of the Council’s guidance on protecting unfished forage fish is to incorporate any additional needed protections into the current suite of FMPs through an FMP amendment process.¹³

This statement clearly shows that in order to achieve the Council’s management objective adopted in June 2012, additional protections for unmanaged forage species – above and beyond those provided by a revised List – are needed and that they must be implemented

¹¹ PFMC. June 2012. Supplemental Revised Council Action on Consideration of Further Protection of Currently Unmanaged Forage Species. Agenda Item G.1.d.

¹² *ibid.*

¹³ PFMC. February 2013. Pacific Coast Fishery Ecosystem Plan. Public Review Draft of Ecosystem Initiatives Appendix. Page A-7.

through an FMP amendment process. We look forward to participating in this process along with the *ad hoc* committee tasked with completing initiative #1 in order to ensure robust protections for the unmanaged component of the forage base upon which our fisheries and coastal communities depend.

The revisions to the List suggested in the initiatives document appear to mirror those suggested in the draft FEP presented to the Council in November 2012. We support those changes with one exception that we noted in our public testimony during the November 2012 meeting. The draft revisions presented in this document maintain a pre-authorized, non-FMP seine fishery on Pacific saury. We are concerned about the fact that this fishery was not stricken from the List for two reasons. First, we are unaware of any existing commercial fishery on Pacific saury, so its inclusion in the List is perplexing as the stated intent of this task was to identify “fisheries and authorized gears for Federal fisheries operating in the U.S. Exclusive Economic Zone (EEZ) off each state in the most specific and narrow terms possible, for incorporation into the updated List.¹⁴” Second, we are concerned because according to the draft list of Lower-Trophic-Level species included in the initiatives document, Pacific saury is an unmanaged forage species that would otherwise be eligible for protection under initiative #1.¹⁵ For these reasons we request that this fishery be removed from the List, along with the other revisions proposed in the appendix.

Future Initiatives For Council Consideration

In addition to the protection of unmanaged forage species, the stand-alone initiatives document describes several other compelling cross-FMP initiatives that have the potential to greatly improve existing fisheries management and aid in the transition to an ecosystem-based approach. While all of the initiatives in the appendix have merit, there are several proposed initiatives, including the two added through the November 2012 motion that were combined into a single initiative, that have particular merit and should be prioritized by the Council.

A.2.9 - Develop a list of core ecosystem indicators to be tracked through the Annual Report

The draft Annual State of the California Current report presented to the Council in November 2012 does a good job of summarizing and synthesizing critical environmental, biological and socio-economic indicators as they relate to the California Current Ecosystem. The information presented in this report provides an ecosystem context within which the Council will be able to make informed decisions about setting catch-levels and other management measures. As the Integrated Ecosystem Assessment (IEA) process upon which this report is based becomes more

¹⁴ PFM. June 2012. Supplemental Revised Council Action on Consideration of Further Protection of Currently Unmanaged Forage Species. Agenda Item G.1.d.

¹⁵ PFM. February 2013. Pacific Coast Fishery Ecosystem Plan. Public Review Draft of Ecosystem Initiatives Appendix. Page A-11.

refined, and as particular indicators are correlated with changes in productivity and distribution of managed species and associated fisheries, the utility of this report will greatly increase, thus allowing the Council to better achieve OY from each managed fishery.

As stated in the introduction of the report, more evaluation should be done to determine the most appropriate suite of indicators that will best meet the Council's information needs. While some information, such as the abundance and diversity of the forage base, may be critical across FMPs and should be included in every annual report, other data and time series may be more directly applicable to a single FMP or during a particular timeframe. For this reason we are pleased that the Council and the IEA team plans to hold a workshop¹⁶ to determine what core indicators may be appropriate to best inform the Council's decision making process each and every year, and those indicators that may be applicable to a single FMP or under certain oceanographic conditions. As noted above, this proposal has merit on its own, but has also been combined with the following proposal described below.

A.2.9 - Cumulative effects of Council harvest policies

The initiatives document describes a similar process to the one discussed above, yet from the perspective of a National Environmental Policy Act (NEPA) style, cumulative effects analysis. The difference between the two initiatives appears to be that while the indicators presented in the Annual Report seek to inform the annual specifications process, the indicators described in section A.2.9 seek to inform an analysis of the additive and cumulative impacts of all the Council FMPs and other regulatory actions, rather than looking at each management action in isolation.

While the Council will continue to manage fisheries through its species-specific FMPs, having an understanding of the cumulative effects of all the Council's FMP policies on the ecosystem will greatly improve management and help to provide an ecosystem context for the decision making process. To this end, we concur with the following statement from the Groundfish Management Team:

"...we suggest that the Council consider how to use the information produced in IEAs to stay abreast of the state of the ecosystem and use that information to inform management. This may also provide information on cumulative impacts that would help improve National Environmental Policy Act (NEPA) analyses (e.g. as contemplated under the Amendment 24 process under the groundfish fisheries management plan).¹⁷"

¹⁶ PFM. November 2012. NWFSC and SWFSC Report. Agenda Item K.2.b

¹⁷ PFM. November, 2012. Groundfish Management Team on Draft Pacific Coast Ecosystem Plan. Agenda Item K.1.c.

This section of the initiatives document poses a question that is central to the matter of how and why to develop ecosystem indicators:

“Could ecosystem status indicators do more than simply illustrating the current and past states of the ecosystem by also identifying points at which management programs should change?”

The answer to this question is a resounding yes!

A.2.1 - Long-term effect of Council harvest policies on age- and size- distribution

Maintaining age and size diversity within managed fish stocks is an important objective for fishery managers because we know in general that older, larger female fish have higher fecundity, are more productive, and help buffer against the effects of climate change by maintaining resilience within the stock.¹⁸

The idea with this initiative would be to conduct an analysis of the effects of all of the Council’s current harvest control rules on the age- and size- distribution of those species managed through federal FMPs to determine if those rules and management approaches pose a risk to long-term productivity of the stock or to the ecosystem as a whole. Additionally, through this initiative the Council could conduct a management strategy evaluation to look at alternative harvest control rules that incorporate age- and size- structure reference points, and see how they perform against Council established metrics.

This initiative is particularly compelling because not only does it have the potential to minimize risk to long-term stock productivity, but it also has the potential to increase fishery yield over the long term:

...simulation studies suggest that reductions in fishing mortality, from current spawning biomass targets, would achieve increases in effective larval output and yield, suggesting that managing for age structure can increase both resilience and yield in fished stocks (Berkeley 2006).¹⁹

A.2.2 - Bio-geographic region identification and assessment

Chapter 3 of the FEP identifies three separate bio-geographic regions within the California Current Ecosystem. The Northern sub-region extends from Cape Flattery in Washington to Cape

¹⁸ Berkeley, S.A. Pacific rockfish management: are we circling the wagons around the wrong paradigm? Bull. Mar. Sci., 78(3): 655-668.

¹⁹ PPMC. November 2012. Draft Pacific Coast Fishery Ecosystem Plan. Agenda Item K.1.a. Page 162.

Blanco in Oregon. The Central sub-region extends from Cape Blanco to Point Conception in California. The southern sub-region, also known as the Southern California Bight, extends from Point Conception to the Mexico border. Within these regions are various types of habitats that, if identified, catalogued and mapped could allow the Council to manage fisheries on a finer spatial scale, thus helping to implement an ecosystem-based approach to management.

Identification of sub-regions and associated habitats could also help provide a framework for spatially-explicit management of fisheries to better prevent localized or serial depletion of regionally and/or seasonally critical species, such as many of the forage species that our commercially important species depend upon at specific spatiotemporal junctures throughout a given season. As noted in the initiative document:

Identifying finer scale sub-regions within the CCE could help scientists and managers better assess sub-populations, regional management issues, and how the effects of management decisions may vary between sub-regions. Identifying sub-regions could also help the larger natural resource science and management community to better assess and understand connections between terrestrial and marine ecosystems at a smaller than coastwide scale.²⁰

A.2.3 - Cross-FMP bycatch and monitoring

National Standard 9 requires that regional councils seek to minimize bycatch and bycatch mortality to the extent practicable.²¹ Precise and accurate monitoring of bycatch is a necessary component of any strategy to meet this standard. As stated in the initiatives document, one focus could be to look at best practices and results across FMPs in order to develop Council wide bycatch monitoring and minimization goals and objectives. This cross-FMP approach would better enable the Council to address cumulative bycatch issues, whether an innovation in one fishery could be applied to another, or whether there are temporal and/or spatial overlaps or interactions with bycatch encountered in fisheries managed under separate FMPs.

While the Council's concern over bycatch has focused on its groundfish and highly migratory species fisheries, the salmon fishery has additional concerns with minimizing impact to endangered salmon runs. Additionally, the fact that much of the sardine fleet fishes predominantly in the area of the Columbia River plume raises the issues of the extent to which sardine seine gear interacts with both adult and juvenile salmonids.

²⁰ PPMC. February 2013. Pacific Coast Fishery Ecosystem Plan. Public Review Draft of Ecosystem Initiatives Appendix. Page A-14.

²¹ 50 C.F.R. § 600.350.(a)(1) & (2)

A.2.4 - Cross-FMP essential fish habitat (EFH) identification

The Council has established EFH for each of its 4 FMPs and reviews each EFH designation every 5 years. The idea with this initiative would be to integrate this process across FMPs for future 5-year reviews. Having an ecosystem-based, cross-FMP approach to EFH identification and protection would provide a broader view of EFH for all Council managed fisheries and would help to develop research needs, identify interactions between protected species, and broad threats to habitat quality such as ocean acidification. This initiative could also provide a venue to address complex EFH issues such as those that involve species managed under multiple FMP's. For instance, the abundance and availability of a species managed under one FMP may have significant EFH effects on a species managed under a different FMP. The availability of forage, and the question of whether forage fish, or more precisely the presence of forage fish, should be considered a component of EFH for predator species, is a classic example of this dynamic, and one recognized in federal regulation. Specifically, the Interim Final Rule for EFH issued on December 19, 1997 states,

“The statutory definition of EFH includes “feeding” as an ecological function of EFH necessary to a species. Therefore, presence of adequate prey is one of the biological properties that can make a habitat essential.”²²

Perhaps most importantly, this initiative could identify EFH for more than one FMP by mapping those habitats that are important for more than one FMP. With this information the Council could focus protection efforts to minimize adverse impacts to EFH identified in multiple FMPs, and help to better understand the interactions between habitat and multiple FMP species. For example, the CPS fishery establishes EFH based on ocean temperature rather than spatially. As this EFH changes both seasonally and inter-annually, identifying when and where CPS EFH overlaps with EFH for other species we can learn more about foraging patterns and predator hot-spots to better inform a spatially informed, ecosystem-based approach to management.

Management of Forage Species and Achieving Optimum Yield

National Standard 1 (NS1) Guidelines state that the benefits of ecosystem protection result from among other things, “maintaining adequate forage for all components of the ecosystem.”²³ The guidelines go even further by directing that in FMPs, “consideration should be given to managing forage stocks for higher biomass than B_{MSY} to enhance and protect the marine ecosystem.”²⁴ In short, forage conservation is a primary component of ecosystem-based

²² See EFH Interim Final Rule published in Federal Register 12/19/97 available at <http://www.gpo.gov/fdsys/pkg/FR-1997-12-19/pdf/97-33133.pdf>, page 66541

²³ 50 C.F.R. § 600.310(e)(3)(iii)(C).

²⁴ 50 C.F.R. § 600.310(e)(3)(iv)(C).

fishery management²⁵ and should be a major focus of the research, monitoring and assessment activities called for in the FEP, as well as the way in which its implementation will enhance management.

The MSA mandates that FMPs seek to achieve OY in order to provide the greatest overall benefit to the Nation, particularly with respect to food production, recreational opportunities and protecting marine ecosystems.²⁶ Under the MSA, Optimum Yield is defined as Maximum Sustainable Yield (MSY) reduced by relevant social, economic and ecological factors.²⁷ The incorporation of these factors into the determination of catch levels is thus a requirement of FMPs.²⁸ Clearly, a major objective of the FEP is to assist the Council in identifying, assessing and explicitly incorporating these factors into its existing FMPs as an adjustment from MSY to establish OY.

These factors are particularly crucial for the management of forage species, due to their supportive role as prey for commercially and recreationally valuable species. In order to fully assess the economic factors necessary to establish OY, the management of forage species should consider new scientific studies evaluating the economic value of forage species as prey for other recreationally and commercially important species relative to their economic value as commercially targeted stocks.²⁹ Moreover, economic and social OY adjustments must be carefully designed so that they do not overlook the possible negative impacts of forage fish depletion on fisheries for marine predators in higher-trophic levels (e.g., salmon and tuna). Additionally, these adjustments must incorporate long-term economic impact assessments on all stakeholders for fisheries which are dependent on forage species.

In regards to ecological OY considerations for single-species management, the FEP should provide guidance to help assess the relative contribution of the particular forage stock to the diets of key predators with respect to population trends and ocean conditions in order to manage the fishery in a way that maintains that ecological contribution. Last, informational products from the FEP (i.e. cumulative impact analysis, ecosystem considerations in stock assessments, IEA modeling efforts, etc.) should analyze alternative forage management strategies to identify and minimize any potential negative impacts to existing fisheries and the ecosystem.

²⁵ See also: Warren, Brad. 2007. *Sea Change: Ecological Progress in U.S. Fishery Management*. A report jointly commissioned by the Marine Conservation Alliance and the Institute for Social and Economic Research and the University of Alaska Anchorage. July, 24, 2007.

²⁶ 16 U.S.C. 1851 § 301(a)(1)

²⁷ 16 U.S.C. 1802 § 3(33)(B).

²⁸ 50 C.F.R. § 600.310(e)(3)(iv)(C).

²⁹ Hannesson, R., & Herrick JR, S. 2010. The value of Pacific sardine as forage fish. *Marine Policy*, 34(5), 935-942.

Similar to utilization of ecosystem indicators developed through the Annual State of the Ecosystem Report, the FEP should identify and evaluate ecological and economic tradeoffs and alternative management scenarios. As these tradeoffs are identified, a framework must be in place to ensure that this information is considered and utilized in the decision-making process that currently occurs within the context of single-species/species complex FMPs. Establishing this framework will be an essential part of ensuring a transparent and explicit derivation of OY.

Conclusion

We'd like to commend the Council for its development of the Pacific FEP and its stated intent to utilize the FEP to aid in the transition to an ecosystem-based approach to fisheries management. As our knowledge of the marine ecosystem grows, so too will our ability to protect ecosystem structure and function while at the same time managing sustainable fisheries. The first and most crucial step in this process is to conserve the marine food web, and this priority is reflected in the Council's current focus on protecting unmanaged forage species.

Forage species populations fluctuate dramatically in response to ocean conditions and face increasing pressure from climate change and other forces beyond the control of the Council. At the same time, we know that fishing pressure exacerbates these stressors and can result in forage populations reaching unnaturally low-levels.³⁰ While the Council can't stop global warming or regulate non-fishing impact on the marine environment, it can seek to minimize negative impacts to the ecosystem from the fisheries it does control. Adopting a meaningful FEP that is utilized in the decision making process will enable the Council to achieve our established national goal of transitioning to an ecosystem-based approach to fisheries management.

We appreciate the Council undertaking this endeavor and look forward to working with all stakeholders to maintain healthy oceans and sustainable fisheries.

Thank you in advance for your time and consideration.

Sincerely,



Steve Marx

The Pew Charitable Trusts

³⁰ Hsieh et al. 2006. Fishing elevates variability in the abundance of exploited species. *Nature* 443:859-862.
Doi:10.1038/nature05232



March 19, 2013

Dan Wolford, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Integrating Fishery Ecosystem Plan (FEP) Information and Initiatives into Council Fishery Management Decisions

Dear Chairman Wolford,

Wild Oceans (formerly the National Coalition for Marine Conservation or NCMC) is celebrating 40 years of bringing fishermen and environmentalists together to keep the oceans wild for the future of fishing. We firmly believe that conserving a healthy reserve of forage fish, and with it the predator fish and associated commercial and recreational fisheries they sustain (along with many marine mammals and seabirds), is sound environmental *and* economic policy. It's a win-win result for all of us, whether we fish for recreation, to make a living, enjoy seafood or simply value marine life in all its infinite variety.

We strongly support the Pacific Fishery Management Council's move to an ecosystem-based approach to fishery management (EBFM). And we commend the council for its recent actions, which provide a solid framework for EBFM, as we discuss below. We encourage the council going forward to focus on integrating the FEP information and initiatives into the fishery management process.

We are especially pleased that the council recognizes the need to consider the status of the California Current Ecosystem (CCE) forage base when making future management decisions. To maintain a healthy CCE, we need to monitor and measure the health of the overall west coast forage base; conserve those prey species, like sardine, squid and mackerel, that we fish for; and prevent new fisheries for unmanaged species until we fully understand the impacts of fishing on the broader food web.

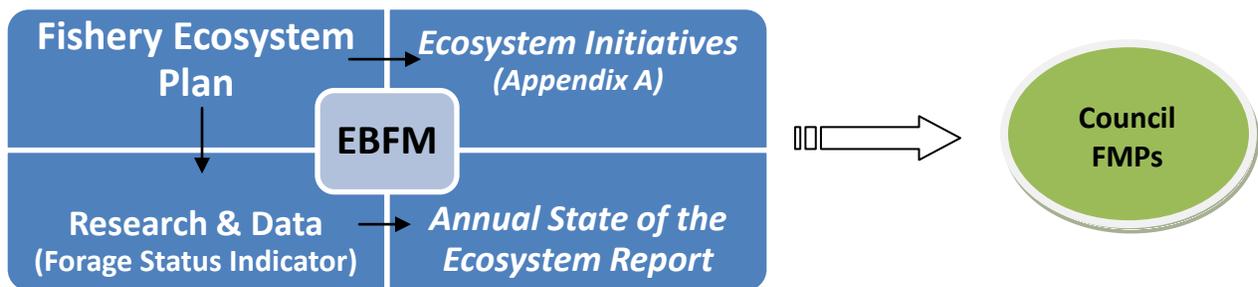
With this in mind, we strongly urge the Pacific Fishery Management Council to:

- Approve the Final Fishery Ecosystem Plan (FEP) and Ecosystem Initiatives (Appendix A) at the April 2013 meeting;
- Appoint an Ad Hoc Committee of Forage Species Experts to recommend a regulatory means for implementing FEP Initiative 1, a prohibition on fishing for unmanaged species, for council action at the June meeting;
- Enlist the experts on this same Ad Hoc Committee to begin laying the groundwork for an index of forage status that would be used to inform future council decision-making, a task that was identified under the highest priorities for EBFM in the 5-year Research and Data Needs plan adopted in March; and lastly,
- Initiate a full management strategy evaluation (MSE) for sardine and other coastal pelagic species (CPS) relative to meeting new standards for forage fish protection and the CPS plan goal of providing adequate forage for dependent species.

Making EBFM Operational

The simplest, and therefore probably the best, definition of EBFM can be found in the old Chinese saying that nature is not composed of things, but of relations. **In taking an ecosystems-approach, the council needs to consider each component as part of the whole (see Figure 1); to look at how all the parts relate to each other and how they will work together. Ultimately, that means outlining the pathways that will bring EBFM into the species-group fishery management process and make it operational.**

Figure 1



The council has assembled the four cornerstones of a solid foundation for EBFM, each with a critical role, all interrelated. The council's **Fishery Ecosystem Plan (FEP)** serves as the umbrella document, containing the council's goals and objectives for ecosystem-based fishery management and articulating its guiding principles.

The FEP’s Appendix A, **Ecosystem Initiatives**, serves as a means to translate FEP objectives into desired management actions, beginning with Initiative 1, restrictions on fishing for currently unmanaged forage species. A process for adding new Initiatives, such as ecosystem indicator development, is described.

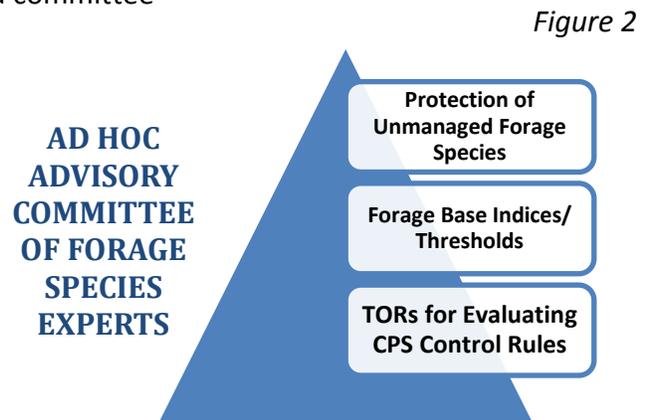
The FEP’s “purpose and needs” determine science priorities as laid out in the **Ecosystem Research & Data Needs** (part of the council’s approved 5-Year Research Plan). Among these priorities is development of ecosystem status indicators, such as overall abundance of forage fish (including un-fished, unmanaged species) as well as abundance of the CPS (coastal pelagic species) assemblage of actively managed species.

The **Annual State of the Ecosystem Report** is the mechanism for interpreting research and data, e.g., applying values to ecosystem status indicators, and presenting it to the council in a way that will inform decisions made under species-group fishery management plans.

An Ad Hoc Committee of Forage Species Experts

The Ecosystem Initiatives document suggests broad use of ad hoc advisory committees to develop future Initiatives. Such a committee was recommended in the November 2012 motion approving the FEP for public review, a committee of forage species experts assigned to

examine the regulatory options for protecting unmanaged species. Because EBFM requires considering the entire forage base, both fished and un-fished species, we urge the council to form an Ad Hoc Committee of Forage Species Experts (see *Figure 2*) to perform the following tasks: a) determine criteria for identifying unmanaged species and develop recommendations for action to protect them at the June 2013 meeting; b) lay the groundwork for an index of forage status to which “reference points” could be applied for management use; and, c) suggest Terms of Reference for evaluating sardine and mackerel harvest guidelines, through a Management Strategy Evaluation (MSE), for their effectiveness in “maintaining adequate forage for the ecosystem” as the Magnuson-Stevens Act National Standard 1 Guidelines advise.



Thank you for considering our views.

Sincerely,

Ken Hinman
President


Pam Lyons Gromen
Executive Director



March 19, 2013

Pacific Fisheries Management Council
Via email: pfmc.comments@noaa.gov

Re: Adoption of the Fishery Ecosystem Plan - Agenda Item H.1

Dear Council Members,

The Environmental Action Committee of West Marin is a grassroots environmental advocacy organization committed to the protection of the wildlife, wildlands and waters of West Marin since 1971. We offer the following comments in support of the adoption of the Fishery Ecosystem Plan (FEP).

Thank you for taking action in November to adopt the preliminary draft Pacific FEP and release it for public review. Thank you also for reinserting the draft list of California Current forage species into the section on FEP Initiative #1 and creating an initiative to develop a list of core ecosystem indicators to be tracked through the Annual Report. As the Council discussed in November, one core indicator should monitor the status of the forage base.

We urge the Council to take final action on adopting the FEP at your meeting this month. Adopting a meaningful FEP constitutes a major step forward in the national transition to an ecosystem-based approach to fisheries management.

The top priority of the FEP should be to ensure a healthy ecosystem, and the first key step should be protection of the marine food web. Following final adoption of the FEP, the Council should proceed with its first ecosystem-based initiative by beginning the process of providing FMP-level protections for unmanaged forage fish.

The first FEP initiative is to prohibit new fisheries on currently unmanaged forage fish until the Council can assess any potential impacts to existing fisheries and communities. We understand that the first phase of that initiative - to update the Pacific Fishery Management Council's List of Authorized Fisheries and Gear - is underway. In the FEP's discussion of this initiative, it is noted that the first phase (described above) alone is not enough to accomplish the Council adopted objective of the initiative.

Therefore, in order to accomplish that objective, additional protections for unmanaged forage species must be implemented through a Fishery Management Plan (FMP) amendment process as called for in the Council's June 2012 motion that established this initiative.

Thank you very much for your consideration of our comments, and for your work to protect our priceless wild fisheries, beginning with forage fish.

Respectfully submitted,

A handwritten signature in black ink that reads "Amy Trainer". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Amy Trainer, Executive Director