Agenda Item H.1

Adoption of the Pacific Coast Fishery Ecosystem Plan 9 April 2013

Chairman Wolford and Pacific Fishery Management Council:

Thank you for the opportunity to speak.

I would like to urge the Council to adopt the Fishery Ecosystem Plan as drafted, and in particular to adopt and implement the FEP's Initiative #1 for the protection of unmanaged forage fish species.

Low-trophic-level fish such as herring, smelt, anchovies, and sardines are vital to the integrity of our marine and coastal food webs and ecosystems. Maintaining healthy populations of these fish will help ensure a reliable food supply for larger fish of commercial interest, for seabirds, and for marine mammals. I personally can best address seabirds. Research and monitoring clearly shows that forage fish populations have direct and substantial influence on seabird reproductive capacity and population levels. In turn, seabirds can be effective indicators of forage fish abundance. The Pacific Coast of North America has some of the richest seabird communities in the world, which testifies to the natural wealth of our fish populations and marine ecosystems. Yet many of our seabird species are declining, and this indicates a need for a precautionary approach to conservation and management of the fish they depend on.

As forage fish come under increasing harvesting pressure for aquaculture and other uses, we urgently need to have in place policies that will limit harvests and ensure the conservation of these fish. It would be unwise to open any new fishery without careful assessment based on strong scientific research. I would urge you to take recent science into account in pursuing ecosystem-based strategies that truly protect the key players and processes that make for functioning marine ecosystems and sustainable fisheries.

The FEP's Initiative #1 is an excellent step in the direction we need to go. Thank you very much for your efforts in drafting the plan, and I urge its adoption.

Jay Withgott Textbook author in **e**nvironmental science Portland, Oregon 2 April 2013

To the Pacific Fisheries Management Council

Concerning: the Fisheries Ecosystem Plan and forage fish initiative

I am writing in support of the Fish Ecosystem Plan Initiative to prohibit new fisheries on currently unmanaged forage fish. I believe that this is necessary until the Council can assess any potential impacts to existing fisheries, top predators and other forage fish consumers, including marine mammals. As I have missed the deadline for written submissions through the website, I have asked Tara Gallagher to present this on my behalf at the Council meeting.

I am a professor of Fisheries and Wildlife at Oregon State University, a member of the Biological Review Team for the status review of humpback whales under the US Endangered Species Act and a national delegate to the Scientific Committee of the International Whaling Commission. I have more than 30 years of experience with the study of humpback whales in the North Pacific. I am writing here in a personal capacity as a professional with an interest in the role of recovering populations of whales in the ecosystem. My views do not necessarily reflect the views of Oregon State University.

My reasons for supporting the Initiative relate to the need for a better understanding of the importance of forage fish to regional populations of humpback whales. Humpback whales are now recovering in abundance, following their protection from commercial hunting nearly 50 years ago. With this increase, humpback whales will be returning to their previous role as primary consumers of both krill and forage fish throughout the middle and upper latitudes of the North Pacific. Studies conducted over the last two decades have clearly shown the specialization of some humpback whales on forage fish, particularly Pacific herring, capelin and sandlance. Studies of stable isotope ratios from skin samples of living whales show that some of this foraging specialization or prey preference is regional, with whales showing greater consumption of forage fish off central California and in the northern Gulf of Alaska compared to northern British Colombia. Direct observation of foraging behavior shows that some prey preference is also individual or highly localized, as evidence by a small number of whales in southeastern Alaska showing specialization on herring feeding through group lunge-feeding. To my knowledge, this highly specialized, coordinated group foraging strategy has not been observed anywhere else in the world.

As humpback whales are likely to consume as much as 400 kg/day (approximately 880 lbs/day) during the summer feeding season (up to 6 months), a better understanding of their prey preferences and specialization is needed to develop accurate ecosystem models. For this reason, I further support the Pacific Fisheries Management Council in its efforts to adopt ecosystem-based

approaches to fisheries management. I urge the council to include humpback whales and other top predators and primary consumers in this approach.

Sincerely

Professor, Department of Fisheries and Wildlife

Associate Director, Marine Mammal Institute

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Hatfield Marine Science Center, Oregon State University

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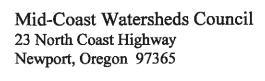
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SALMON RIVER, SILETZ RIVER, YARUNA RIVER, ALCEA RIVER, YAUHATE RIVER, AND CREAN TRINICARIES

April 4, 2013

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

Agenda item: H1

Re: support of FEP adoption

Dear Chairman Wolford and Council Members:

The MidCoast Watershed Council is a non-profit group located on the central Oregon coast. We have been working for 15 years to restore riverine and estuary habitat in the Siletz, Yaquina, Alsea, and Yachats basins. We have an economy based in good part on scientific research, commercial and recreational fishing activities, as well as on eco-tourism boasting many bird and whale watchers. Our Board of Directors, including recreational and commercial fishing interests, conservationists, agencies, and landowners, works to promote activities that protect and restore diverse habitats critical to the recovery of ESA listed Coho as well as watershed processes to support abundant levels of multiple species to support fishing and a healthy ecosystem. We write today in support of the Pacific Fishery Management Council's (Council) Fishery Ecosystem Plan(FEP) and urge the Council to adopt the plan at your April meeting. We also urge you to initiate the implementation of Ecosystem-based Initiative 1- the protection of unmanaged forage species.

We applauded the decision by the Council last June to conserve un-fished forage fish as an acknowledgement that they are a cornerstone of a productive marine ecosystem along the Pacific coast. Many people are just now understanding the role that forage fish play and how essential they are to a healthy ocean environment and how they critical to healthy fish, seabirds, shorebirds, and marine mammals populations. We ask that you fulfill your commitment to prohibit new fisheries targeting forage species that are not yet being fished.

Fax: 541-265-9351

We are aware that our marine environment is being affected by large-scale changes in climate, oceanic processes, coastal habitat degradation, and invasive species. Our coastal area, similar to others throughout your jurisdictional area, is under constant pressure to develop in sensitive areas and is still impacted by the legacy of past practices that continue to stress the environment. With these pressures and the reality that only a sustainable, resilient ocean ecosystem (including a balanced food web) will allow our region to help meet the need to feed a growing world, your FEP effort comes at the right time. We urge you to adopt the draft FEP, including the suggested schedule and amendment process for plan and Appendix A (Ecosystem Initiatives Appendix)

We hope that through the FEP, an index measuring forage abundance along the West Coast be developed and used. Such an index could help the Council maximize the benefits we derive from the ocean by weighing the tradeoffs between large-scale fisheries targeting prey fish versus leaving them in the water to feed high-value predators like salmon, tuna and halibut as well as other fish and wildlife.

Sincerely,

Wayne Hoffman Coordinator April 9, 2013

Mr. Dan Wolford, Chair Pacific Fishery Management Council 7700 NE 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 would like to take this opportunity as the River Steward Program Director for Native Fish Society to support of the Council's Fishery Ecosystem Plan and accompanying Ecosystem Initiatives.

Guided by the best available science, Native Fish Society advocates for the recovery of wild, native fish and promotes the stewardship of the habitats that sustain them. We do this for the benefits that healthy watersheds provide to present and future generations - and for the intrinsic virtues of rivers themselves. NFS uses a watershed approach to river and aquatic species conservation. Our priorities are to build lasting solutions for people and species that depend on healthy watersheds and actively promote watershed restoration.

The convergence of population growth and global climate change has thrust water-related issues to the forefront of many environmental debates. Every living creature depends on water, and water is impacted by, and connected to, virtually everything we do as humans. In the West, water resources are diminishing in quality and quantity. Land use practices continue to degrade water quality and watershed health. At the same time, scientific research clearly indicates that water resources will be further impacted by climate change. Thus, the threats to freshwater ecosystems have never been more abundant or more immense.

Each year, millions of ocean-bound juvenile salmon migrate through miles and miles of freshwater streams and tributaries. As they reach the Columbia River Basin and the near-shore ocean, their survival depends to a large degree on the presence of forage fish. It's no coincidence that salmon time the peak of their June run for the open ocean in May and June, when forage fish are most abundant. The extra calories provided by oil-rich forage fish enable salmon to grow larger, produce stronger eggs and improve reproductive success. Well-functioning food webs are fundamental for sustaining rivers as ecosystems and maintaining associated aquatic and terrestrial communities.

Biotic conservation is most successful where actions are aimed at protecting ecosystems rather than restoring them after the damage is done. We applied the Council's proactive approach to ecosystem-based management. Incorporating food web considerations into management helps test assumptions and leads to discovery of species interactions that influence management success. Although the modeling of complete food webs may be difficult, there are approaches that can yield useful results relatively quickly. Therefore, Native Fish Society urges the Council to adopt their final Fishery Ecosystem

Plan at their April meeting in Portland and to begin work to implement protections for currently unmanaged forage species through a management plan amendment.

Thank you for considering our comments.

Sincerely,

Mark Sherwood

River Steward Program Director

Native Fish Society