

September 7, 2014

Pacific Fisheries Management Council
Dorothy M. Lowman, Chair
7700 N.E. Ambassador Place, Suite 101
Portland, Oregon 97220-1384

RE: Agenda Item H.1. Ecosystem -- Unmanaged Forage Fish Protection Initiative Preliminary Preferred Alternative (PPA)

Dear Chair Lowman and Council Members:

As a coastal citizen, business consultant, and science writer, I've followed for decades the economics of fisheries and the interconnection between a steady supply of commercial fish and the environment that sustains that supply.

Your efforts to conserve forage fish preserves an important part of the marine food web. As you consider elaborating on your efforts at the upcoming September meeting in Spokane, I hope that you will recognize the complex nature of the food web and the place of forage fish in that web, and that you will strengthen efforts to maintain the necessary populations of these fish for both the natural system and the fishing economy so important to our region.

To this end I hope the Council will consider a range of methods for preventing forage species from being overfished. In the range of possible methods I encourage you to look at the work of people like Dr. Daniel Botkin and at ways to use economic incentives as well as regulations. On the matter of incentives interesting work and proposals have been made by PERC. It seems clear to me from my knowledge of environmental history that incentives are as important, or more important, than regulations, and I hope you will think creatively and arrive at a proper mix. Incentives of course, give fishermen a personal stake in sustainable fisheries.

The basis for your decisions, quite clearly, should be both the very best scientific information on the dynamics of the food web, and on the behavioral and economic impacts of both regulations and incentives. If questions arise about the proper population levels, I urge you to act conservatively in to give high priority to answering scientific and economic questions.

Among the actions that seem almost obvious for the September meeting is to recognize in amendment language the role of forage fish in the ecosystem that sustains commercial fishing of species higher in the food chain and of more economic value.

Thank you for your continuing attention to these issues,

Sincerely,

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