

## ECOSYSTEM BASED MANAGEMENT: UPDATE LIST OF FISHERIES

At its June 2012 meeting, the Council recommended preventing the future development of fisheries for currently unfished forage fish species through a two-stage process: 1) amending and updating the federal list of authorized West Coast Exclusive Economic Zone (EEZ) fisheries and gear found in regulation at 50 CFR 600.725(v), and 2) developing any additional necessary protections for unfished and unmanaged forage fish through amendments to one or more of the Council's fishery management plans. At this meeting, the Council is initiating the first step in this process.

To develop Council recommendations on revisions to the List of Fisheries, the Council and its Ecosystem Plan Development Team (EPDT) drafted a set of proposed amendments to the current list for review by the states and tribes, its advisory bodies and the public. The most recent version appeared in the April Briefing Book (April 2013, Agenda Item H.1.a, Attachment 2 (<http://tinyurl.com/onrxkdl>)).

The EPDT has been working on revisions to the list in accordance with Council guidance from the June 2012 and April 2013 Council meetings (June 2012, Agenda Item G.1.d, Supplemental Revised Council Action [<http://tinyurl.com/7e7vmgx>]) and is scheduled to report their recommendations in June 2013 (Agenda Item H.1.a, Supplemental Attachment 1). These recommendations reflect the Council's June 2012 intent to identify authorized fisheries and gear in the "most specific and narrow terms possible."

At this stage, the Council is scheduled to develop recommendations to National Marine Fisheries Service to update the federal list of fisheries and gear. At this meeting, the Council may adopt a revised list for public review, or may direct the EPDT to further review the list before sending it out for public review. When final, the Council intends to transmit those recommendations, along with any accompanying analyses, to NMFS, requesting publication of a proposed rule to implement the recommendations. NMFS would then publish the proposed rule and, after an appropriate public comment period, determine whether to approve, disapprove, or partially approve a final rule implementing revisions to the list.

Attachment 1 provides the current list of authorized fisheries and gear with the EPDT's suggested revisions. Potential revisions to this table should consider only those fisheries that occur wholly or partially within Federal waters (3-200 nm offshore). No revision to the table should have the effect of prohibiting currently legal directed fisheries or incidental catch.

### **Council Action:**

#### **Consider Updates to the List of Fisheries.**

#### **Reference Materials:**

1. Agenda Item H.1.a, Attachment 1: Supplemental EPDT Report.
2. Agenda Item H.1.c, Public Comment.

Agenda Order:

- a. Agenda Item Overview
- b. Reports and Comments of Advisory Bodies and Management Entities
- c. Public Comment
- d. **Council Action:** Adopt Updates to the List of Fisheries for Public Review

Jennifer Gilden

PFMC  
05/28/13

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON  
UPDATING THE LIST OF FISHERIES

The Coastal Pelagic Species Advisory Subpanel (CPSAS) reviewed the supplemental Ecosystem Plan Development Team (EDPT) reports addressing revisions to the Federal List of Fisheries and Gear (Agenda Item H.1.b, Supplemental EPDT Reports, June 2013), giving particular attention to Table 2, which outlines the proposed changes to the List. A number of CPSAS members were also present during the Coastal Pelagic Species Management Team (CPSMT) discussion of the proposed changes to the list, which helped to resolved some of the CPSAS' questions on this list.

The CPSAS would like to commend the Ecosystem Plan Development Team for their work, not only in revising and refining the list of fisheries, but additionally in providing rationale for the proposed changes and making efforts to ensure existing fisheries were not inadvertently excluded from the list. The CPSAS would, however, like to highlight two areas where the list may be further improved upon or where additional clarification may be necessary:

1. Table 2 Section 3 (Coastal Pelagic Species Fisheries (FMP)): The CPSAS recommends the inclusion of a recreational category. This change is necessary to cover currently authorized recreational catch of mackerel and other CPS species, and would also cover the take of live bait by recreational anglers. The CPSAS recommends the following authorized gear types to be included under a CPS FMP recreational sub-section: hook-and-line, dip net, and cast net.
2. Table 2 Section 10 (Squid, all spp. except market squid, and Octopus Fisheries (Non-FMP)): The CPSAS would also like to recommend inclusion of language in the heading of this section "and not otherwise prohibited." This new heading would therefore read: "Squid (all species except market squid), octopus fisheries, and those not otherwise prohibited (non-FMP)."

Following resolution of these issues, the CPSAS recommends the updated List of Authorized Fisheries be circulated for public review and comment.

COASTAL PELAGIC SPECIES MANAGEMENT TEAM REPORT ON  
UPDATING THE LIST OF FISHERIES

The Coastal Pelagic Species Management Team (CPSMT) reviewed the Ecosystem Plan Development Team (EDPT) report addressing revisions to the Federal list of fisheries and gear (Agenda Item H.1.b, Supplemental EPDT Report). The CPSMT acknowledges the difficulty in developing a comprehensive yet concise list of fisheries and commends the EPDT's effort on this task.

The CPSMT believes the revised list is acceptable in meeting the Council's directive to describe authorized fisheries and gear in the most specific and narrow terms possible and, as updated, correctly captures existing fisheries managed under the CPS Fishery Management Plan (FMP). Further, it leads to better protection of unmanaged forage fish by removing Pacific saury, in particular, and limiting gears in the general non-FMP commercial fishery category (Table 2, #18) to those impractical for commercial harvest of forage fish.

The CPSMT notes there is no separate category for recreational CPS fisheries under Item 3 (Table 2) in the EPDT report. However, Item 18b of Table 2 includes recreational CPS fisheries and presents the suite of recreational gears permitted by one or more of the three states for CPS. This approach is consistent with the CPS FMP which does not specifically establish management measures for recreational CPS fisheries. The CPS FMP recognizes that states regulate recreational catch and gear, but maintains the authority to establish regulations in Federal waters if deemed necessary.

In conclusion, the CPSMT recommends that the updated list of fisheries be adopted for public review.

PFMC  
06/24/13



## ECOSYSTEM ADVISORY SUBPANEL REPORT ON UPDATING THE LIST OF FISHERIES

The Ecosystem Advisory Subpanel (EAS) met via teleconference on June 14<sup>th</sup>, 2013 and reviewed the Ecosystem Plan Development Team (EPDT) report regarding proposed updates to the Federal list of fisheries and gear authorized for use in the West Coast exclusive economic zone (Agenda Item H.1.b, Supplemental EPDT Report, June 2013). The EAS commends the EPDT for a thorough treatment of a complex issue, and offers the following comments.

The EAS appreciates the difficulty of listing every existing species and fishery on the West Coast, but some members expressed concern that line 18 of Table 2<sup>1</sup> is too vague and does not meet the Council intent of identifying existing fisheries and authorized gears in “the most specific and narrow terms possible.” Similarly, line 10 is inclusive of all species of squid other than market squid, which could also be interpreted more broadly than existing fisheries, and new fisheries for forage species such as the pelagic neon flying squid would be allowed without notification. The EAS understands the intent of the language was to prevent the exclusion of existing, mostly State-managed fisheries with small landings of a wide variety of non-Fishery Management Plan species, but the EAS could not reach consensus that the proposed list is adequately specific to prevent the unrestricted development of new fisheries. Some members of the EAS were concerned that removal of line 18 could inadvertently prohibit or burden some existing legally-authorized fisheries and supported retaining the language provided by the EPDT.

It was also pointed out that the Council’s direction to the EPDT in June, under item C<sup>2</sup> could be interpreted to mean preventing development of non-existent fisheries rather than applying an appropriate application process and management, as needed, to requests for future fisheries.

The EAS agreed that the list would benefit from additional Council, state, tribal, Council advisory body, and public input, and recommends that the proposed list be adopted for public review.

PFMC  
06/19/13

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<sup>1</sup> „18. Finfish and Shellfish Fisheries Not Listed Above and Not

<sup>1</sup> Otherwise Prohibited (Non-FMP)”.

<sup>1</sup>

<sup>2</sup> “C. The EPDT’s report shall include any analysis on the possible effectiveness of the List’s application process in meeting the goal of preventing development of non-existent fisheries.”

## ECOSYSTEM PLAN DEVELOPMENT TEAM REPORT ON REVISING THE FEDERAL LIST OF FISHERIES AND GEAR AUTHORIZED FOR USE IN THE WEST COAST EEZ

### ***A. Introduction***

The Pacific Fishery Management Council adopted its Fishery Ecosystem Plan (FEP) and FEP appendix at its April 2013 meeting in Portland, OR. As a first task following that adoption, the Council asked that the Ecosystem Plan Development Team (EPDT) report back at the June 2013 meeting on potential revisions to the Federal list of fisheries and gear authorized for use in the West Coast Exclusive Economic Zone (EEZ). Under the Magnuson-Stevens Fishery Conservation and Management Act (MSA) at Section 305(a), the Secretary of Commerce (via NMFS) is required to maintain a list of all fisheries and fishing gear authorized for use within each EEZ area under Council jurisdiction. No person or vessel is permitted to “employ fishing gear or engage in a fishery not included on such list without giving 90 days advance written notice to the appropriate Council...” The list of fisheries essentially prohibits anyone from developing a new fishery without first providing a review opportunity to the appropriate Council. Fisheries not on the list are not prohibited altogether, but Councils may use the 90-day period to comment on, develop a regulatory plan for, or recommend that NMFS prohibit the proposed fishery as appropriate.

Federal regulations at 50 CFR 600.725(v) provide the list of fisheries and gear authorized for use within the U.S. EEZ within a long table, separated by geographic areas under the jurisdictions of different fishery management councils. Fisheries authorized for the U.S. West Coast EEZ are found in Section VI of that table, which is notably out of date and inaccurate for most Council-managed fisheries. Appendix A to the FEP, at Section A.1.2.1, discusses the process by which the Council will develop recommendations to NMFS to update the federal list of authorized West Coast EEZ fisheries and gear at 50 CFR 600.725(v):

*The Council’s intent is that the updated list identify authorized fisheries and gear in the “most specific and narrow terms possible” (Final Council Action at G.1.d, June 2012). To develop Council recommendations on revisions to that list, the Council should send out a set of proposed amendments to the current list for review by the states and tribes, its advisory bodies and the public. Once the Council has received comments on its proposed amendments and recommendations for any revisions, the Council may finalize its recommended changes to the list of authorized fisheries and gear. The Council may then transmit those recommendations, along with any accompanying analyses, to NMFS, requesting publication of a proposed rule to implement the recommendations. NMFS would then publish the proposed rule and, after an appropriate public comment period, determine whether to approve, disapprove, or partially approve a final rule implementing the Council’s recommendations.*

The Council also provided direction on this issue at its June 2012 meeting, under agenda item G.1.:

- A. Regarding the List of Fisheries, all Council advisory bodies shall be tasked with identifying fisheries and authorized gears for Federal fisheries operating in the U.S. EEZ off each state in the most specific and narrow terms possible, for incorporation into the updated List. This exercise shall be completed by the advisory bodies and provided to the EPDT as soon as possible after completion of the FEP.
- B. For state-managed fisheries, the states shall be responsible, through their EPDT representatives, for preparing the list of state-managed fisheries which have a nexus with Federal waters, for inclusion in the updated List.
- C. The EPDT's report shall include any analysis on the possible effectiveness of the List's application process in meeting the goal of preventing development of non-existent fisheries.
- D. The report shall also include, to the extent possible, any new information or analysis regarding the application of 50 CFR 600.747 of the Federal rules, including whether there is a possibility of amending these regulations for the West Coast such that additional requirements and specifications regarding the Council's review of applications could be formally incorporated into Federal regulations.
- E. Regarding the Council's standards which would be used in assessing whether a proposed new fishery could compromise conservation and management measures within the West Coast EEZ, the EPDT report shall provide full detail of the proposed standards and process, in order to make the procedural and content requirements clear and transparent to both applicants and the public.
- F. As soon as possible after completion of the FEP and upon receipt of the report, the Council shall review and provide guidance so that the standards (for assessing new fisheries) can be finalized for incorporation into the FEP.

Each of these Council directions from June 2012 is addressed below, except for Direction D. Under Direction D, the Council had asked whether Federal regulations at 50 CFR 600.747, which apply to all U.S. fisheries generally, could be modified so that more restrictive measures could be implemented just for the U.S. West Coast EEZ. Federal regulations at 50 CFR 600.5 provide the purpose of and scope for the suite of regulations at 50 CFR 600, which is to govern the operations of all fishery management councils and the broad responsibilities of the Councils and the Secretary under the MSA. Unless the MSA itself provides geographically-specific direction, the regulations at 50 CFR 600, including §600.747, are intended to apply throughout all U.S. EEZ areas.

***B. Potential Revisions to the West Coast EEZ List of Authorized Fisheries and Gear  
(Council Directions A & B from June 2012 G.1.d. Supplemental REVISED Final Council Action)***

In response to the Council's June 2012 G.1.d. directions A and B, the EPDT proposes potential revisions to the Federal list of authorized fisheries and gear for the U.S. West Coast EEZ, below, for review and consideration by the Council, its advisory bodies, and the public. Proposed revisions were based on Council direction for this task to:

- take into account changes in both federal and state fisheries management programs that have occurred since the list was first set in place in 1996;
- constrain the list of authorized fisheries and gear to those that currently occur within the EEZ, rather than leaving the list as open as possible.

Table 1 of this report provides the existing list of authorized fisheries and gear found in federal regulations. Following Table 1, we suggest changes to each section of that table and the rationale for those suggestions. Table 2 of this report shows the list of authorized fisheries and gear for the U.S. West Coast EEZ as it would look if the EPDT suggestions were implemented. In both tables, the term “Non-FMP” means that the species or species groups listed are not managed under a federal FMP. Some species referred to in these tables as “Non-FMP” may be managed under state fishery management plans, but they are still considered “Non-FMP” within federal regulations.

As the Council considers which fisheries and gear to retain on or remove from the list, it should bear in mind that removing a fishery from the list does not prohibit that fishery from ever occurring again in the future. Rather, it requires that anyone interested in developing a fishery for a species not on the list notify the Council 90 days in advance of fishing for that species in the EEZ, giving the Council an opportunity to consider regulations for that species and fishery. The larger questions the Council should be asking itself are: “What fisheries do we want to know about before they occur within the EEZ? What types of unfished species might we want to regulate in the future, should fisheries participants expresses interest in targeting those species?”

<b>Table 1. Authorized West Coast EEZ Fisheries and Gear (Section VI of the table at 50 CFR 600.725(v), last modified on June 24, 1996 [61 FR 32540].)</b>	
<b>Fishery</b>	<b>Authorized gear types</b>
<b>1. Washington, Oregon, and California Salmon Fisheries (FMP):</b>	
A. Salmon set gillnet fishery	A. Gillnet
B. Salmon hook and line fishery	B. Hook and line
C. Trawl fishery	C. Trawl
D. Recreational fishery	D. Rod and reel
<b>2. West Coast Groundfish Fisheries (FMP):</b>	
A. Pacific coast groundfish trawl	A. Trawl
B. Set gillnet fishery	B. Gillnet
C. Groundfish longline and setline fishery	C. Longline
D. Groundfish handline and hook-and-line fishery	D. Handline, hook-and-line
E. Groundfish pot and trap fishery	E. Pot, trap
F. Recreational fishery	F. Rod and reel, handline, spear, hook and line
<b>3. Northern Anchovy Fishery (FMP)</b>	Purse seine, lampara net
<b>4. Angel Shark, White Croaker, California Halibut, White Sea Bass, Pacific Mackerel Large-Mesh Set Net Fishery (Non-FMP)</b>	Gillnet
<b>5. Thresher Shark and Swordfish Drift Gillnet Fishery (Non-FMP)</b>	Gillnet
<b>6. Pacific Shrimp and Prawn Fishery (Non-FMP):</b>	

<b>Table 1. Authorized West Coast EEZ Fisheries and Gear (Section VI of the table at 50 CFR 600.725(v), last modified on June 24, 1996 [61 FR 32540].)</b>	
<b>Fishery</b>	<b>Authorized gear types</b>
A. Pot and trap fishery	A. Pot, trap
B. Trawl fishery	B. Trawl
<b>7. Lobster and Rock Crab Pot and Trap Fishery (Non-FMP)</b>	Pot, trap
<b>8. Pacific Halibut Fishery (Non-FMP):</b>	
A. Longline and setline fishery	Longline
B. Hook-and-line fishery	Hook and line
<b>9. California Halibut Trawl and Trammel Net Fishery</b>	Trawl, trammel net
<b>10. Shark and Bonito Longline and Setline Fishery (Non-FMP)</b>	Longline
<b>11. Dungeness Crab Pot and Trap Fishery (Non-FMP)</b>	Pot, trap
<b>12. Hagfish Pot and Trap Fishery (Non-FMP)</b>	Pot, trap
<b>13. Pacific Albacore and Other Tuna Hook-and-line Fishery (Non-FMP)</b>	Hook and line
<b>14. Pacific Swordfish Harpoon Fishery (Non-FMP)</b>	Harpoon
<b>15. Pacific Scallop Dredge Fishery (Non-FMP)</b>	Dredge
<b>16. Pacific Yellowfin, Skipjack Tuna, Purse Seine Fishery (Non-FMP)</b>	Purse seine
<b>17. Market Squid Fishery (Non-FMP)</b>	Purse seine, dip net
<b>18. Pacific Sardine, Pacific Mackerel, Pacific Saury, Pacific Bonito, and Jack Mackerel Purse Seine Fishery (Non-FMP)</b>	Purse seine
<b>19. Finfish and Shellfish Live Trap, Hook-and-line, and Handline Fishery (Non-FMP)</b>	Trap, handline, hook and line
<b>20. Recreational Fishery (Non-FMP)</b>	Spear, trap, handline, pot, hook and line, rod and reel, hand harvest
<b>21. Commercial Fishery (Non-FMP)</b>	Trawl, gillnet, hook and line, longline, handline, rod and reel, bandit gear, cast net, spear

The biggest challenges in defining the gears used in existing fisheries were: how to address allowable gears for fisheries where retention of a species is only allowed for particular gears when those gears take the species in question as bycatch, and allowing for differences between state laws and regulations affecting non-federal fisheries. The list of authorized fisheries and gear is intended to acknowledge existing fisheries and to require notification when new fisheries begin. Table 2 provides the gears authorized for *targeting* the species referenced. Federal and state laws allowing or requiring retention of bycatch species are not affected or modified by the list of authorized fisheries and gear. For example, Pacific halibut may only be targeted in the commercial fisheries with hook and line gear, while its interception in the groundfish trawl fishery must be monitored under the Individual Bycatch Quota program. In Table 2, hook and line gear is listed as the allowable gear for Pacific halibut fishery participants and trawl is one of the allowable gears for groundfish fishery participants. When a vessel is using the legal gear for the fishery it is participating in, it is subject to all of the regulations that apply to that fishery, including bycatch regulations. A vessel that has bycatch on board, in keeping with the regulations for its fishery, is not starting a new fishery and would be considered in compliance with the list of authorized fisheries and gear.

To address differences among state authorities, Table 2 separates some gear authorizations by latitude lines. We used this approach to indicate what may be authorized by only one or more

states within state waters or for its citizens operating within federal waters. There may be better ways to address differences in how to consider the effects of state management regimes within the EEZ; this approach is intended to respond to the Council's direction to identify fisheries in "the most specific and narrow terms possible." In general, fishing activities in Washington are prohibited unless authorized by rule. Oregon has taken the opposite approach and fishing activities must be explicitly regulated. In California, recreational fisheries are prohibited unless authorized; however, commercial fisheries are allowed unless specifically regulated or prohibited.

In Washington, commercial gears authorized by another state or under one of the Council's FMP may not be allowed under Washington law. For instance, drift gillnet is explicitly prohibited. Gears such as pelagic longline, entangling net, set net, trammel net, and harpoon are not authorized by the state. Commercial fishing activities require a state fishing license. If state regulations specify allowable gear types, then other gears not listed would be unauthorized. Persons under the jurisdiction of Washington should check state rules before participating in or attempting to land fish into the state. In addition, area-specific rules on recreational fishing gears, seasons, and possession limits are described annually in the state's sport fishing rules.

In Oregon, commercial and recreational fisheries for marine finfish and shellfish generally are open unless otherwise restricted or prohibited. For commercial finfish species, the following commercial gears are allowed except as provided for specific fisheries: trawl, pot/trap, longline, seine, handline, hook and line (including vertical), dipnet, and spear. Similarly, for commercial shellfish fisheries, the following gears are allowed except as provided for specific fisheries: longline, pot/trap, dipnet, seine, trawl, spear, hand and hand-powered tools. Set net gear may also be allowed under an experimental gear permit. Oregon commercial fishing licenses and applicable limited-entry permits are required to fish in state waters or to make landings into the state. The following recreational gears are allowed except as provided for specific finfish fisheries: angling (hook and line,) hand, bow and arrow, spear, gaff hook, snag hook and herring jigs. For recreational shellfish, legal gears are specific to each type of shellfish. Persons wishing to fish in state waters or land fish in the state should consult the respective commercial or recreational fishing rules for Oregon.

In California, all fish may be taken at any time or by any gear for commercial purposes unless otherwise restricted or prohibited. Except as provided, California's marine recreational finfish fisheries regulations have a general gear allowance for hook and line or by hand. There are also allowances for most species for spearfishing or use of bow and arrow, which, in some cases, applies to species taken in the EEZ (however, these exceptions do NOT apply to salmon, striped bass, or broadbill swordfish). All invertebrates can only be taken by hand, unless a special exception applies (e.g., mollusks may also be taken by hook and line, squid may be taken with hand held dip nets, crabs may be taken with hoop nets or traps, shrimp may be taken with Hawaiian throw or dip nets.)

In keeping with the lists of fisheries for other fishery management council's at 50 CFR 600.725, Table 2 is divided by species or species groups. When assessing which state-managed species and fisheries to include in the table, the EPDT first asked itself whether the targeted species could be caught in federal waters. Species like razor clams and abalone could safely be left off the table. Species that usually occur in state waters, but which are occasionally caught in the EEZ, like many species of crabs, were kept in the table. Some species in the table, like bonito,

are more frequently caught within the U.S. West Coast during El Niño years, but El Niño years occur often enough that it seemed proper to include such species in the table.

The current list of authorized fisheries and gear allows dredge gear for Pacific scallops (see Table 1,) but that fishery no longer occurs and it does not appear in Table 2. The Council's approach to essential fish habitat over the last 15 years has included area restrictions for and more careful monitoring of the use of bottom-contacting fishing gear, and Table 2 would require future potential users of dredge gear to provide advance notification to the Council. All commercial fisheries that use net gear (trawl, pelagic and demersal seines, gillnet, set net, trammel net, etc.) in the EEZ are explicitly named in Sections 1-17 of Table 2, so that those gears could be eliminated from the general category of commercial gears allowed in the EEZ without advance consultation with the Council. We eliminated those gears from the general category (Section 18 of Table 2) because forage fish species tend to be targeted with those gears in fisheries elsewhere worldwide, and it was concern for the development of future fisheries for lower trophic level species that spurred the Council to consider changes to the list of authorized fisheries and gear. For the recreational fisheries in Table 2, a broad grouping of gears is permitted for use without Council notification in Section 18. The explicitly named recreational fisheries in Sections 1-17 are those that are managed with a more restrictive list of allowable gears than those provided in Section 18.

For all sections of Table 2, general gear terms were used where possible. For example, federal regulations at 50 CFR 600.10 define "hook and line" gear as "one or more hooks attached to one or more lines (can include a troll)." In Table 2, below, where multiple hook and line gear types are allowable, the general term "hook and line" is used, rather than individual terms such as "troll," "vertical hook and line," "pelagic longline," "bottom longline," etc. Similarly, federal regulations provide the same definition for pot and trap gear, and that definition includes both individually deployed traps and longline traps. Therefore, the general term "Pot/trap" is used in Table 2, below, and includes gear that might be defined explicitly as "pot" or "trap" gear under state regulations, as well as those more tightly defined state fisheries gears such as "crab ring." Similarly, state fisheries that use similar net gears are grouped together, even if the fisheries for those species require different mesh sizes in their net gears. Future drafts of this list could use more gear-specific terms if the Council wishes to more tightly constrain gears used in particular fisheries.

The following changes are proposed for the list of fisheries:

1. Group all of the Federal FMP species fisheries at the top of the table, followed by Pacific halibut, which is managed under a Council Catch Sharing Plan. Next, list state-managed fisheries for which landings occur in all three states. Finally, list state-managed fisheries for which landings may occur in only two states or one state. The geographic boundaries in Table 2 refer to areas where catch may be landed.
2. For both the Council's Salmon and Groundfish FMPs: modify those sections of the list to separate commercial from recreational fisheries, ensure that all gears authorized by the FMPs are listed, and re-label the sections with the names of the Council's FMPs ("Pacific Coast Salmon Fisheries" and "Pacific Coast Groundfish Fisheries.")

3. For the Council's Coastal Pelagic Species FMP: add a new section for this FMP, ensure that all gears used by FMP fisheries are listed, and remove all of the old sections of the list that are now redundant because those species are now FMP species (the Northern Anchovy FMP, Pacific mackerel as a species taken in Non-FMP Fisheries, the Non-FMP Market squid fishery, and Pacific sardine and jack mackerel as species taken within a Non-FMP purse seine fishery.) The list has not been amended since the Council's adoption of the Coastal Pelagic Species FMP, which is why the list is so outdated from current management practices. Recreational fisheries for these species would fall under the new Section 18, for all species neither listed nor otherwise prohibited.
4. For the Council's HMS FMP: add a new section for this FMP, ensure that all gears authorized by the FMP are listed, and remove all of the old sections of the list that are now redundant because those species are now FMP species (the Non-FMP Thresher Shark and Swordfish Drift Gillnet Fishery, the Non-FMP Pacific Swordfish Harpoon Fishery, the Non-FMP Pacific Albacore and Other Tuna Hook-and-Line Fishery, and the Non-FMP Pacific Yellowfin, Skipjack Tuna Purse Seine Fishery). The list has not been amended since the Council's adoption of the Highly Migratory Species FMP, which is why the list is so outdated from current management practices.
5. For the Council's Pacific Halibut Catch Sharing Plan: modify this section to separate commercial from recreational fisheries, ensure that gear authorized by the International Pacific Halibut Commission is listed.
6. For state-managed Dungeness crab fisheries: modify this section to separate commercial from recreational fisheries. Provide separate sub-sections for the three state recreational fisheries, which allow different gear types.
7. For state-managed crab fisheries for species other than Dungeness crab: modify this section to separate commercial from recreational fisheries, and recognize that commercial fisheries for crab species other than Dungeness are not authorized off Washington. Provide separate sub-sections for the three state recreational fisheries, which allow different gear types.
8. For state-managed shrimp and prawn fisheries: modify this section to separate commercial from recreational fisheries and to update the allowable gear types. Provide sub-sections for: Washington's commercial trawl-only pink shrimp fishery; Washington and California's commercial pot/trap-only spot prawn fisheries; Oregon's commercial trawl and pot/trap fisheries; California's commercial trawl and pot/trap fisheries for species other than spot prawn; and three separate sections for each of the different state recreational fisheries, which allow different gear types.
9. The section for the coastwide commercial hagfish fishery using pot/trap gear is unchanged from Table 1 to Table 2.
10. Fisheries for squid species other than market squid, which is an FMP species, and for octopus are organized so that: commercial and recreational fisheries are separated and



coastwide commercial gear designations are provided; a sub-section is provided for recreational squid fisheries off Washington and Oregon, which allow the same gear types; a sub-section is provided for recreational octopus fisheries off Washington and Oregon, which allow the same gear types; and a sub-section is provided for recreational fisheries off California, which allow different gear types from the other two states.

11. Fisheries for state-managed white sturgeon fisheries: separate commercial from recreational fisheries and update the allowable gear types. Provide sub-sections for: Oregon's commercial fisheries, which allows only trawl, pot/trap, hook and line, seine, dip net, and spear; Washington and Oregon's recreational fisheries, which allow only hook and line; and California's recreational fishery, which allows only hook and line and spear.
12. The commercial sea cucumber fisheries are added to the table and different gear designations are provided for Oregon and California fisheries.
13. Sections 13-17 in Table 2, below, address fisheries that are authorized by only one state, usually because the species in those sections do not have coastwide ranges: Oregon's minor finfish commercial fishery (Section 13) Oregon's authorized (but inactive) weathervane scallop trawl fishery (Section 14); California's commercial fisheries for California halibut and white seabass (Section 15); California's commercial drift net fishery for California barracuda, white seabass, and yellowtail (Section 16); and California's Pacific bonito fisheries (Section 17).
14. Section 18 in Table 2, which provides authorizations for the use of named gears without advance consultation with the Council, is revised from the general gear categories in the current list of authorized fisheries and gear (Sections 20 and 21 of Table 1). In keeping with the Council's direction to define fisheries "in the most specific and narrow terms possible," the EPDT's proposals to specifically identify several fisheries not previously identified eliminates the need for including some gears within Section 20. The EPDT recommends removing Pacific saury from the list of authorized commercial fisheries and gear because there has not been a commercial landing of Pacific saury since at least 1980. Any future Pacific saury landings would likely occur as incidental catch in with fisheries targeting CPS or HMS species.

Based on the modifications suggested above, Table 2 provides potential revisions to the List of Authorized Fisheries and Gear:

<b>Table 2. Proposed revisions to the Federal List of Authorized West Coast EEZ Fisheries and Gear (at 50 CFR 600.725(v), June 2013 EPDT draft.</b>	
<b>Fishery</b>	<b>Authorized gear types</b>
<b>1. Pacific Coast Salmon Fisheries (FMP):</b>	
A. Commercial fisheries – coastwide	Hook and line
B. Recreational Fisheries	Hook and line
<b>2. Pacific Coast Groundfish Fisheries (FMP):</b>	
A. Commercial fisheries	Trawl, hook and line, pot/trap, demersal seine, set net, spear, and hand collection
B. Recreational fisheries	Hook and line, spear

<b>Table 2. Proposed revisions to the Federal List of Authorized West Coast EEZ Fisheries and Gear (at 50 CFR 600.725(v), June 2013 EPDT draft.</b>	
<b>Fishery</b>	<b>Authorized gear types</b>
<b>3. Coastal Pelagic Species Fisheries (FMP)</b>	
A. Commercial fisheries	Purse seine, lampara net, brail net, dip net, cast net, hook and line
<b>4. Highly Migratory Species Fisheries (FMP)</b>	
A. Commercial	Hook and line, gillnet, harpoon, purse seine
B. Recreational	Hook and line, spear, harpoon, bow and arrow
<b>5. Pacific Halibut Fisheries (Non-FMP):</b>	
A. Commercial fisheries	Hook and line
B. Recreational fisheries	Hook and line, spear
<b>6. Dungeness Crab Fisheries (Non-FMP)</b>	
A. Commercial	Pot/trap
B. Recreational North of 46°15' N. lat.	Pot/trap, dip net, hand harvest
C. Recreational South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, hook and line, dip net, hand harvest, rake
D. Recreational South of 42° N. lat.	Pot/trap, hand harvest, hoop net, crab loop
<b>7. Crab Fisheries for Species other than Dungeness crab (Non-FMP)</b>	
A. Commercial Pot/Trap Fisheries South of 46°15' N. lat.	Pot/trap
B. Recreational North of 46°15' N. lat.	Pot/trap, dip net, hand harvest
C. Recreational South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, hook and line, dip net, hand harvest, rake
D. Recreational South of 42° N. lat.	Pot/trap, hand harvest, hoop net, crap loop
<b>8. Shrimp and Prawn Fisheries (Non-FMP):</b>	
A. Commercial pink shrimp North of 46°15' N. lat.	Trawl
B. Commercial spot prawn North of 46°15' N. lat. and South of 42° N. lat.	Pot/trap
C. Commercial South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, trawl
D. Commercial South of 42° N. lat. for all species except spot prawn	Pot/trap, trawl
E. Recreational North of 46°15' N. lat.	Pot/trap, dip net, hand harvest
F. Recreational South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, hook and line, dip net, hand harvest, rake
G. Recreational South of 42° N. lat.	Pot/trap, hand harvest, dip net
<b>9. Hagfish Commercial Fisheries (Non-FMP)</b>	Pot/trap
<b>10. Squid, all spp. except market squid, and Octopus Fisheries (Non-FMP)</b>	
A. Commercial	Hook and line, pot/trap, dip net, seine, trawl, set net, spear, hand harvest
B. Recreational Squid Fisheries North of 42° N. lat.	Hook and line, cast net, dip net, hand harvest
C. Recreational Octopus Fisheries North of 42° N. lat.	Hook and line, pot/trap, dip net, hand harvest
D. Recreational South of 42° N. lat.	Hook and line, dip net, hand harvest
<b>11. White Sturgeon Fisheries (Non-FMP)</b>	
A. Commercial South of 46°15' N. lat. and North of 42° N. lat.	Trawl, pot/trap, hook and line, seine, dip net, spear
B. Recreational North of 42° N. lat.	Hook and line
B. Recreational South of 42° N. lat.	Hook and line, spear
<b>12. Sea Cucumber Fishery (Non-FMP)</b>	
A. Commercial hand harvest fishery South of 46°15' N. lat.	Hand harvest

<b>Table 2. Proposed revisions to the Federal List of Authorized West Coast EEZ Fisheries and Gear (at 50 CFR 600.725(v), June 2013 EPDT draft.</b>	
<b>Fishery</b>	<b>Authorized gear types</b>
B. Commercial trawl fishery South of 42° N. lat.	Trawl
<b>13. Minor Finfish Commercial Fisheries South of 46°15' N. lat. and North of 42° N. lat. for: Non-FMP Shark species, Pacific pomfret, slender sole, wolf-eel, eelpout species, Pacific sandfish, skilfish, and walleye pollock Fisheries (Non-FMP)</b>	Trawl, pot/trap, hook and line, seine, dipnet, spear
<b>14. Weathervane Scallop Commercial Fishery South of 46°15' N. lat. and North of 42° N. lat. (Non-FMP)</b>	Trawl
<b>15. California Halibut and White Seabass Commercial Fisheries South of 42° N. lat. (Non-FMP)</b>	Trawl, hook and line
A. California halibut trawl fishery	Trawl
B. Set net fishery	Gillnet, trammel net
C. Hook and line fishery	Hook and line
<b>16. California Barracuda, White Seabass, and Yellowtail Drift-Net Commercial Fishery South of 42° N. lat. (Non-FMP)</b>	Gillnet
<b>17. Pacific Bonito and Commercial Net Fisheries South of 42° N. lat. (Non-FMP)</b>	Purse seine
<b>18. Finfish and Shellfish Fisheries Not Listed Above and Not Otherwise Prohibited (Non-FMP)</b>	
A. Commercial	Hook and line, pot/trap, spear
B. Recreational	Hook and line, spear, pot/trap, dip net, cast net, hand harvest, rake, harpoon, bow and arrow

***C. The Effectiveness of the List in Preventing the Development of Fisheries that Do Not Now Exist (Council Direction C from June 2012 G.1.d. Supplemental REVISED Final Council Action)***

In addition to asking that the EPDT develop proposed revisions to the list of authorized fisheries and gear, the Council asked that the EPDT analyze the effectiveness of the List's application process in meeting the goal of preventing development of non-existent fisheries (Direction C). The EPDT has addressed this issue in some of its past reports to the Council, particularly its June 2012 report for Agenda Item G.1. and in Appendix A to the FEP. As discussed in the introduction to this report, the list of authorized fisheries and gear does not prohibit new fisheries altogether. Rather, it requires that persons wishing to develop new fisheries consult with the Council, so that the Council has an opportunity to comment on, develop a regulatory plan for, or recommend that NMFS prohibit the proposed fishery as appropriate.

A person wishing to begin a new fishery that is not listed in 50 CFR 600.725 must first notify the relevant fishery management council or its Director. If the council or its Director receives a complete notification, then "a signed return receipt for the notice serves as adequate evidence of the date that the notification was received by the appropriate Council or the Director, in the case of Atlantic highly migratory species, and establishes the beginning of the 90-day notification period, unless required information in the notification is incomplete" (50 CFR 600.747(c)(2)(i)). Under 50 CFR 600.747(c)(2), the 90-day notification period will be delayed if a complete notification is not received. Complete notification must include:

- (A) Name, address, and telephone number of the person submitting the notification.
- (B) Description of the gear.
- (C) The fishery or fisheries in which the gear is or will be used.
- (D) A diagram and/or photograph of the gear, as well as any specifications and dimensions necessary to define the gear.
- (E) The season(s) in which the gear will be fished.
- (F) The area(s) in which the gear will be fished.
- (G) The anticipated bycatch species associated with the gear, including protected species, such as marine mammals, sea turtles, sea birds, or species listed as endangered or threatened under the ESA.
- (H) How the gear will be deployed and fished, including the portions of the marine environment where the gear will be deployed (surface, midwater, and bottom).

If the notification is complete and the Council finds that the use of the new gear or participation in a new fishery “would not compromise the effectiveness of conservation and management efforts, it shall: (1) Recommend to the [applicable] Regional Administrator that the list [of authorized fisheries and gear] be amended; (2) Provide rationale and supporting analysis, as necessary, for proper consideration of the proposed amendment; and (3) provide a draft proposed rule for notifying the public of the proposed addition with a request for comment” (50 CFR 600.747(c)(3)(B)).

If the notification is complete and the Council finds that “the proposed gear or fishery will be detrimental to conservation and management efforts, it will recommend to the RA [Regional Administrator] that the authorized list of fisheries and gear not be amended, that a proposed rule not be published, give reasons for its recommendation of a disapproval, and may request NMFS to publish emergency or interim regulations, and begin preparation of an FMP or amendment to an FMP, if appropriate” (50 CFR 600.747(c)(3)(C)). After considering the notification and Council's recommendation, “NMFS will decide whether to publish a proposed rule. If information on the new gear or fishery being considered indicates it is likely that it will compromise conservation and management efforts under the Magnuson-Stevens Act, and no additional new information is likely to be gained from a public comment period, then a proposed rule will not be published and NMFS will notify the appropriate Council. In such an instance, NMFS will publish emergency or interim regulations to prohibit or restrict use of the gear or participation in the fishery” (50 CFR 600.747(c)(3)(D)).

In summary, introducing a new fishery to an EEZ is essentially a multi-step decision-making process: the interested party first notifies the Council of an intent to fish and provides supporting evidence for the anticipated effects of the fishery; the Council assesses that evidence and decides whether to support or prevent the initiation of the fishery, and makes recommendations to that effect to NMFS; NMFS assesses the evidence and the Council's recommendations and decides whether to formalize the Council's recommendation via federal regulation. As discussed below, the Council has already taken steps to set standards for a complete notification and to improve the quality of information that must be provided to the Council in order for the Council to best assess whether a new proposed fishery might be detrimental to its fishery conservation and management measures.

***D. Standards the Council Would Use in Assessing a Proposed New West Coast EEZ Fishery***  
***(Council Direction E from June 2012 G.1.d. Supplemental REVISED Final Council Action)***

Finally, the Council's June 2012 directions to the EPDT included a request that the EPDT report on the standards the Council would use in assessing whether a proposed new fishery could compromise conservation and management measures within the West Coast EEZ (Direction E). The Council adopted standards for assessing proposed new fisheries in April 2013, when it adopted Appendix A to the FEP. Because the Council also left Appendix A open to modification, those standards may be modified through Council action under revisions to the list of authorized fisheries and gear or under action the Council may take under FEP Initiative 1. The following text, excerpted from Appendix A at Section A.1.1, provides the Council's current standards for assessing whether a proposed new EEZ fishery could compromise its conservation and management measures:

***A.1.1 Council Policy on the Development of New Fisheries for Unfished Species***

*Under Title II of the MSA, there is no allowable level of foreign fishing for species currently unfished within the U.S. West Coast Exclusive Economic Zone (EEZ). Fishing vessels and fish processors of the U.S. have the capacity to harvest and process the levels of optimum yield of all species subject to Council FMPs.*

*U.S. citizens wishing to initiate new fisheries for West Coast EEZ species that are not subject to Council FMPs, nor explicitly permitted by the list of fisheries described in the Magnuson-Stevens Fishery Conservation and Management Act (MSA) at 16 U.S.C. §1855 and in federal regulations at 50 CFR 600.725(v), are urged to approach the Council with an application for an Exempted Fishing Permit (EFP,) accompanied by a science plan for that EFP fishery, describing the data to be collected by the EFP fishery and the likely analyses needed to assess the potential effects of converting the fishery to an FMP fishery over the long-term. EFP fishery data and analyses should, at a minimum, assess: the amount and type of bycatch species associated with the EFP gear, including protected species, such as marine mammals, sea turtles, sea birds, or species listed as endangered or threatened under the Endangered Species Act (ESA); how the gear will be deployed and fished, and its potential effects on EFH, including the portions of the marine environment where the gear will be deployed (surface, midwater, and bottom). The Council and its advisory bodies will review the results of the EFP to assess whether the information provided is adequate to determine the potential effects of the fishery on the Council's conservation and management measures. Depending on the quality of information received, and on the potential effects of the fishery on the Council's conservation and management measures, the Council will either reissue the EFP, or discontinue the EFP and initiate development of an FMP, FMP amendment, or regulatory amendment process to either prohibit the new fishery from the EEZ, or introduce the new fishery to the EEZ.*

*U.S. citizens wishing to bypass the EFP process to initiate new fisheries for West Coast EEZ species that are not subject to Council FMPs, nor explicitly permitted by the list of fisheries described in the MSA at 16 U.S.C. §1855 and in federal regulations at 50 CFR 600.725, may do so by following the Council notification process described at 50 CFR 600.747. However, that notification is required to be reviewed by the Council and NMFS for the potential effects of new*

*fisheries on the Council's conservation and management measures for, at a minimum, FMP species, protected species, and for the habitat of managed and protected species. A review conducted in the absence of the scientific data that could be provided by an EFP would be necessarily precautionary.*

*Whether introduced via the EFP process, or via the notification process at 50 CFR 600.747, the Council would view new fisheries as having the potential to affect its conservation and management measures if those fisheries had an effect on:*

- *Any Council-managed species;*
- *Species that are the prey of any: Council-managed species, marine mammal species, seabird species, sea turtle species, or other ESA-listed species;*
- *Habitat that is identified as EFH or otherwise protected within one of the Council's FMPs, critical habitat identified or protected under the ESA, or habitat managed or protected by state or tribal fishery or habitat management programs;*
- *Species that are subject to state or tribal management within 0-3 miles offshore of Washington, Oregon, or California;*
- *Species that migrate beyond the U.S. EEZ.*

# Ecosystem Plan Development Team List of Authorized Fisheries and Gear

EPDT Presentation for  
H.1.

June 24, 2013



## 218th Session of the Pacific Fishery Management Council

**April 6 – April 11, 2013**

Sheraton Portland Airport Hotel  
8235 NE Airport Way  
Portland, OR 97220  
Telephone: 503-281-2500

Friday April 5	Saturday April 6	Sunday April 7	Monday April 8	Tuesday April 9	Wednesday April 10	Thursday April 11
Advisory Body Meetings – schedule begins on page 8	8:00 am General Session	Groundfish Management	Groundfish Management	Ecosystem- Based Management	Coastal Pelagic Species Management	Administrative Matters
	Administrative Matters					Enforcement Issues
	Open Comment Period			Salmon Management		
	Council Informational Session (Fishery Ecosystem Plan)	Groundfish Management	Administrative Matters			
	Administrative Matters				Salmon Management	
	Groundfish Management		Pacific Halibut Management			
	Salmon Management	Habitat Issues				
		Closed Executive Session				

### Schedule of Ancillary Meetings begins on page 7.

Refer to the Schedule of Ancillary Meetings beginning on page 7 for a complete list of technical and administrative committees, advisory bodies, work groups, state delegations, and special sessions scheduled throughout the week of April 5 through April 11, 2013.

### Proposed Detailed Agenda begins on the next page.

The following items are on the Pacific Council agenda; however, the order of the agenda items may change as required to effectively address the issues.



A & B

C

E

It is the Council's intent to recognize the importance of forage fish to the marine ecosystem off our coast, and to provide adequate protection for forage fish. We declare that our objective is to prohibit the development of new directed fisheries on forage species that are not currently managed by our Council, or the States, until we have an adequate opportunity to assess the science relating to the fishery and any potential impacts to our existing fisheries and communities.

The Council directs the Ecosystem Plan Development Team (EPDT) to proceed with Option 2 as detailed in Agenda Item G.1.b, EPDT Report, and schedule a progress report on its work to update and revise the List of Fisheries (LOF), to be made to the Council as soon as possible after completion of the fishery ecosystem plan (FEP). The Council further directs that:

- A. Regarding the LOF, all Council advisory bodies shall be tasked with identifying 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. This exercise shall be completed by the advisory bodies and provided to the EPDT as soon as possible after completion of the FEP.
- B. For state-managed fisheries, the states shall be responsible, through their EPDT representatives, for preparing the list of state-managed fisheries which have a nexus with Federal waters, for inclusion in the updated List.
- C. The EPDT's progress report shall include any analysis on the possible effectiveness of the LOF application process in meeting the goal of preventing development of non-existent fisheries.
- D. The report shall also include, to the extent possible, any new information or analysis regarding the application of Section 600.747 of the Federal rules, including whether there is a possibility of amending these regulations for the West Coast such that additional requirements and specifications regarding the Council's review of applications could be formally incorporated into Federal regulations.
- E. Regarding the Council's standards which would be used in assessing whether a proposed new fishery could compromise conservation and management measures within the West Coast EEZ, the EPDT progress report shall provide full detail of the proposed standards and process, in order to make the procedural and content requirements clear and transparent to both applicants and the public, consistent with the recommendations outlined in Option 2 of the EPDT Report.
- F. As soon as possible after completion of the FEP and upon receipt of the Progress Report, the Council shall review and provide guidance so that the standards (for assessing new fisheries) can be finalized for incorporation into the FEP.

After completion of the FEP, the Council will proceed to incorporate any needed protection into our current suite of Fishery Management Plans through an amendment process.

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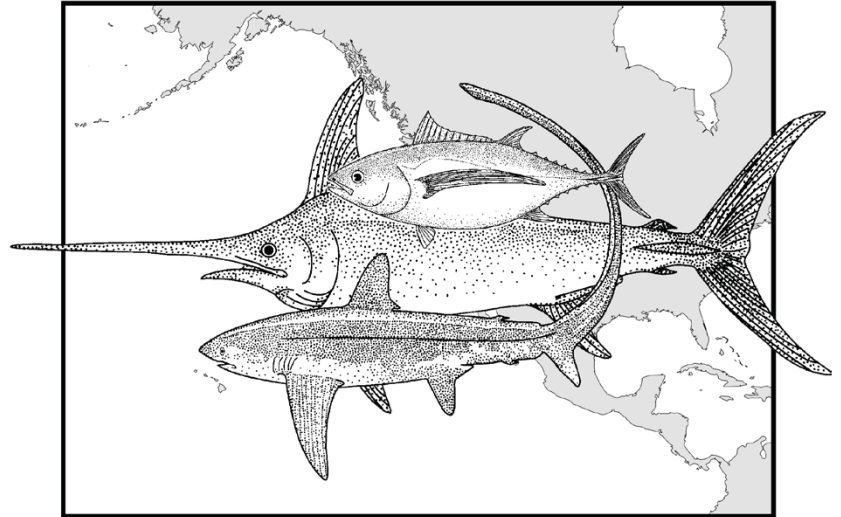
# COASTAL PELAGIC SPECIES FISHERY MANAGEMENT

AS AMENDED THROUGH AMENDMENT 1

PACIFIC FISHERY MANAGEMENT COUNCIL  
7700 NE AMBASSADOR PLACE, SUITE 101  
PORTLAND, OR 97220  
(503) 820-2280  
(866) 806-7204  
[WWW.PCOUNCIL.ORG](http://WWW.PCOUNCIL.ORG)

SEPTEMBER 2011

# FISHERY MANAGEMENT PLAN FOR U.S. WEST COAST FISHERIES FOR HIGHLY MIGRATORY SPECIES



AS AMENDED THROUGH AMENDMENT 2

PACIFIC FISHERY MANAGEMENT COUNCIL  
7700 NE AMBASSADOR PLACE, SUITE 101  
PORTLAND, OREGON 97220  
[WWW.PCOUNCIL.ORG](http://WWW.PCOUNCIL.ORG)

JULY 2011



## ECOSYSTEM PLAN DEVELOPMENT TEAM REPORT ON CORRECTIONS TO TABLE 2

The EPDT found four errors in Table 2 of our original Supplemental EPDT Report for H.1.b. This second supplemental report corrects those errors. Text to be removed is shown in ~~strikeout~~. Text to be added is shown in *italic*. Corrections include:

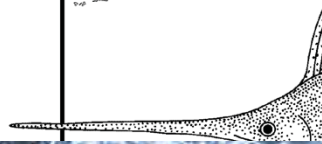
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- Line 15: remove gear types listed in left-hand column at Line 15, because they are redundant to fishery-specific gears listed in lines 15A, 15B, and 15C.
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Fishery	Authorized gear types
<b>1. Pacific Coast Salmon Fisheries (FMP):</b>	
A. Commercial fisheries – coastwide	Hook and line
B. Recreational Fisheries	Hook and line
<b>2. Pacific Coast Groundfish Fisheries (FMP):</b>	
A. Commercial fisheries	Trawl, hook and line, pot/trap, demersal seine, set net, spear, and hand collection
B. Recreational fisheries	Hook and line, spear
<b>3. Coastal Pelagic Species Fisheries (FMP)</b>	
A. Commercial fisheries	Purse seine, lampara net, brail net, dip net, cast net, hook and line
<b>4. Highly Migratory Species Fisheries (FMP)</b>	
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B. Recreational	Hook and line, spear, harpoon, bow and arrow
<b>5. Pacific Halibut Fisheries (Non-FMP):</b>	
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B. Recreational fisheries	Hook and line, spear
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A. Commercial	Pot/trap
B. Recreational North of 46°15' N. lat.	Pot/trap, dip net, hand harvest
C. Recreational South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, hook and line, dip net, hand harvest, rake
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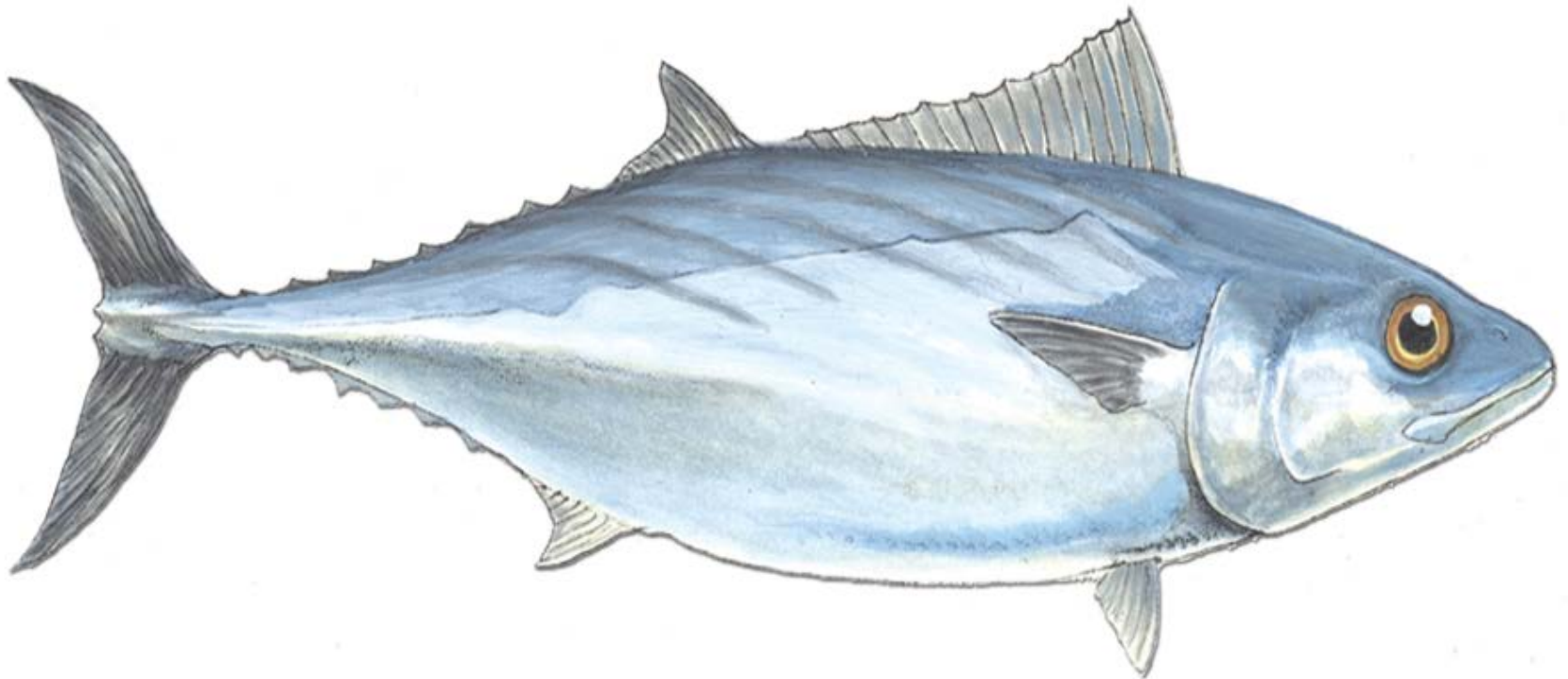
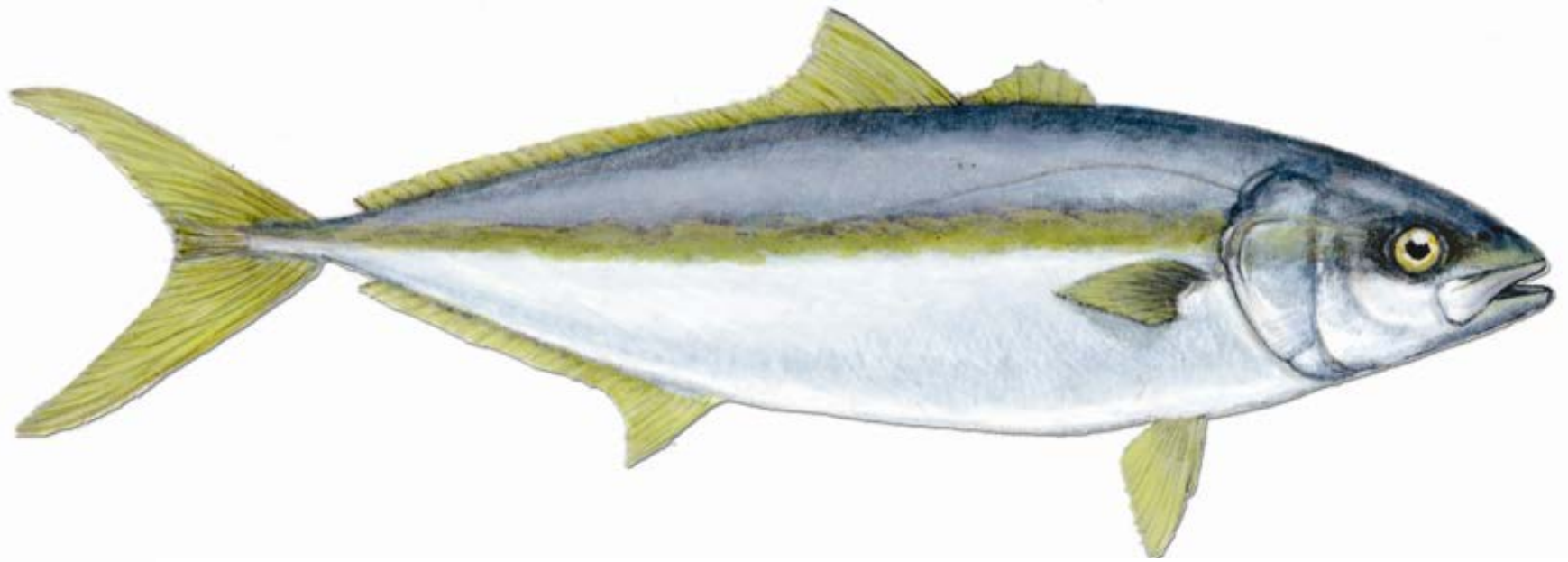
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ECOSYSTEM PLAN DEVELOPMENT  
UNFINISHED BUSINESS

In November 2011, and again in February 2012, the EPDT Team (EPDT) provide the Council authorities or mechanisms available. The EPDT discussed this issue at its April 2012 meeting. A identified eight different options for the fishery. Those authorities may be

(A) Existing tools available to the Council and Gear

**Option 1:** Recommend the Council permit Gear permitted within the EEZ) off the coasts of Washington, Oregon, and (FEP) the standards that the fishery could compromise Coast EEZ

(B) Using FMP amendments to the Council

**Option 3:** Use FMP amendments to one of the Council's current species to one of the Council's current species  
**Option 4:** Use FMP amendments to one of the Council's current species to one of the Council's current species  
**Option 5:** Use FMP amendments to one of the Council's current species to one of the Council's current species

(C) Developing a new Ecosystem

**Option 6:** Shift ongoing management process.

(D) Authorities available to the Council

**Option 7:** Consult with the Council's sanctuaries would consider Sanctuary Act authority.  
**Option 8:** Consult with the Council's processes to: restrict or prohibit the landings of fish products (e.g., reduction in

Table 2, at the end of this document, and regulatory processes needed

PACIFIC  
FISHERY  
FOR THE  
CALIFORNIA CURRENT

PACIFIC  
7700 NE

PUBLIC REVIEW DRAFT

ECOSYSTEM INITIATIVES  
APPENDIX TO THE  
*PACIFIC COAST*  
*FISHERY ECOSYSTEM PLAN*

FOR THE U.S. PORTION OF THE  
CALIFORNIA CURRENT LARGE MARINE ECOSYSTEM

APPENDIX A

PACIFIC FISHERY MANAGEMENT COUNCIL  
7700 NE AMBASSADOR PLACE, SUITE 101  
PORTLAND, OR 97220  
(503) 820-2280  
(866) 806-7204  
WWW.PCOUNCIL.ORG  
FEBRUARY 2013

[illegible]



“Real knowledge is to  
know the extent of  
one’s ignorance.”

-- Confucius



For those images where sources are not shown directly on image, all are courtesy of the U.S. National Oceanic and Atmospheric Administration, except:

Slide 6: jack mackerel, CDFW

Slide 9: spot prawn, ODFW; pink shrimp tow, ODFW

Slide 10: white sturgeon, Oregon State University; slender sole, ODFW; California halibut, CDFW

Slide 11: young Californians at Berkeley Pier, CDFW

Slide 12: anglers and Humboldt squid catch, HuliCat Sportfishing, photo by John C. Field, NOAA SWFSC

Slide 15: Confucius, portrait by Wu Daozi, 685-758, Tang Dynasty.

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<b>4. Highly Migratory Species Fisheries (FMP)</b>	
A. Commercial	Hook and line, gillnet, harpoon, purse seine
B. Recreational	Hook and line, spear, harpoon, bow and arrow
<b>5. Pacific Halibut Fisheries (Non-FMP):</b>	
A. Commercial fisheries	Hook and line

B. Recreational fisheries	Hook and line, spear
<b>6. Dungeness Crab Fisheries (Non-FMP)</b>	
A. Commercial	Pot/trap
B. Recreational North of 46°15' N. lat.	Pot/trap, dip net, hand harvest
C. Recreational South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, hook and line, dip net, hand harvest, rake
D. Recreational South of 42° N. lat.	Pot/trap, hand harvest, hoop net, crab loop
<b>7. Crab Fisheries for Species other than Dungeness crab (Non-FMP)</b>	
A. Commercial Pot/Trap Fisheries South of 46°15' N. lat.	Pot/trap
B. Recreational North of 46°15' N. lat.	Pot/trap, dip net, hand harvest
C. Recreational South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, hook and line, dip net, hand harvest, rake
D. Recreational South of 42° N. lat.	Pot/trap, hand harvest, hoop net, crap loop
<b>8. Shrimp and Prawn Fisheries (Non-FMP):</b>	
A. Commercial pink shrimp North of 46°15' N. lat.	Trawl
B. Commercial spot prawn North of 46°15' N. lat. and South of 42° N. lat.	Pot/trap
C. Commercial South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, trawl
D. Commercial South of 42° N. lat. for all species except spot prawn	Pot/trap, trawl
E. Recreational North of 46°15' N. lat.	Pot/trap, dip net, hand harvest
F. Recreational South of 46°15' N. lat. and North of 42° N. lat.	Pot/trap, hook and line, dip net, hand harvest, rake
G. Recreational South of 42° N. lat.	Pot/trap, hand harvest, dip net
<b>9. Hagfish Commercial Fisheries (Non-FMP)</b>	Pot/trap
<b>10. Squid, all spp. except market squid, and Octopus Fisheries (Non-FMP)</b>	
A. Commercial	Hook and line, pot/trap, dip net, seine, trawl, set net, spear, hand harvest
B. Recreational Squid Fisheries North of 42° N. lat.	Hook and line, cast net, dip net, hand harvest
C. Recreational Octopus Fisheries North of 42° N. lat.	Hook and line, pot/trap, dip net, hand harvest
D. Recreational South of 42° N. lat.	Hook and line, dip net, hand harvest



<b>11. White Sturgeon Fisheries (Non-FMP)</b>	
A. Commercial South of 46°15' N. lat. and North of 42° N. lat.	Trawl, pot/trap, hook and line, seine, dip net, spear
B. Recreational North of 42° N. lat.	Hook and line
B. Recreational South of 42° N. lat.	Hook and line, spear
<b>12. Sea Cucumber Fishery (Non-FMP)</b>	
A. Commercial hand harvest fishery South of 46°15' N. lat.	Hand harvest
B. Commercial trawl fishery South of 42° N. lat.	Trawl
<b>13. Minor Finfish Commercial Fisheries South of 46°15' N. lat. and North of 42° N. lat. for: <del>Non-FMP Shark species</del> Salmon shark, Pacific pomfret, slender sole, wolf-eel, eelpout species, Pacific sandfish, skilfish, and walleye pollock Fisheries (Non-FMP)</b>	Trawl, pot/trap, hook and line, seine, dipnet, spear
<b>14. Weathervane Scallop Commercial Fishery South of 46°15' N. lat. and North of 42° N. lat. (Non-FMP)</b>	Trawl
<b>15. California Halibut and White Seabass Commercial Fisheries South of 42° N. lat. (Non-FMP)</b>	Trawl, hook and line
A. California halibut trawl fishery	Trawl
B. Set net fishery	Gillnet, trammel net
C. Hook and line fishery	Hook and line
<b>16. California Barracuda, White Seabass, and Yellowtail Drift-Net Commercial Fishery South of 42° N. lat. (Non-FMP)</b>	Gillnet
<b>17. Pacific Bonito and Commercial Net Fishery <del>ies</del> South of 42° N. lat. (Non-FMP)</b>	Purse seine
<b>18. Finfish and Shellfish Fisheries Not Listed Above and Not Otherwise Prohibited (Non-FMP)</b>	
A. Commercial	Hook and line, pot/trap, spear
B. Recreational	Hook and line, spear, pot/trap, dip net, cast net, hand harvest, rake, harpoon, bow and arrow

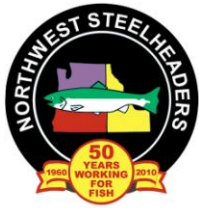
## GROUND FISH ADVISORY SUBPANEL REPORT ON UPDATE LIST OF FISHERIES

The Groundfish Advisory Subpanel (GAP) received information from Ms. Jennifer Gilden, PFMC staff, and Ms. Cyreis Schmitt, with the Ecosystem Plan Development Team (EPDT), on updating the list of fisheries.

The GAP discussed the EPDT report with corrections to Table 2. While the GAP currently agrees with the corrections and has no additional changes to make at this time, we suggest the Council consider those updates and send the list out for public review and outreach.

There is no urgency associated with this issue and the GAP feels greater public review would be helpful. The Council can adopt the changes at a future meeting.

PFMC  
06/22/13



## Association of Northwest Steelheaders

6641 SE Lake Rd. • Milwaukie OR 97222

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Established 1960

May 25, 2013

To: Dan Wolford, Chairman  
Pacific Fishery Management Council  
7700 NE Ambassador Place, #101  
Portland, OR 97220  
Fr: Russell Bassett, executive director  
Re: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and members of the Council,

On behalf of our 1,500 members and other supporting sport anglers in the Northwest, we want to thank the Council for its action in Portland last April of adopting the Ecosystem Based Management Initiative. The initiative calls for looking at harvest limits based on the impact to the entire food chain and not just the specific species being harvested.

This is vitally important to our sport fisheries as full implementation of this initiative will protect forage for the predator species that are so valuable to our sport fisheries as a social value in itself and as the fuel for sport fishing and fishing tourism industries. Now it is time to start implementing this monumental initiative.

Saury is a forage fish species of vital importance to albacore tuna and other predator species. Saury is currently listed in the approved "List of Authorized Fisheries and Gear". While there was an attempt to commercially harvest this species decades ago, there has not been a commercial harvest of saury within the U.S. Exclusive Economic Zone. There has also not been an assessment of the species toward an ecologically-based harvest management plan. Therefore saury does not belong on the list of approved list of authorized fisheries and.

We ask that the PPMC take the logical step of removing saury from the list, allowing any new fishery on this species to first go through the process established for any other unfished species.

Respectfully,

Russell Bassett  
Executive Director

# **The Northwest Guides and Anglers Association**

*To protect, enhance, and promote healthy sportfisheries and the ecosystems they depend on in the Pacific Northwest.*

May 28, 2013

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

Re: Pacific Saury protection

Dear Chairman Wolford and Council Members:

The NW Guides and Anglers Association is made up of over 30 guides and charters also representing thousands of sport anglers that participate in NW sportfishing. Our mission is to protect, enhance and promote healthy sportfisheries and the ecosystems they depend on in the Pacific Northwest. It is for this reason that we are writing to you urging that the council take a forward-looking approach to management of non-managed forage species such as Saury.

It wasn't that many years ago that krill received protection through a progressive action of the Oregon Department of Fish and Wildlife commission. The commission took action banning the take of this critical forage specie as demand was growing and interests were looming to take advantage of this resource for private profit. The commission saw fit to protect krill from commercial harvest so as to not compromise the base of the food chain that feeds so many other sport and commercial species important to our economy and healthy food sources.

Saury now faces the same pressures. As overseas populations dwindle, outside sources continue to eye species such as the Saury to fill their insatiable needs. The NW Guides and Anglers Association urges the council to consider protection of the Saury and other key baitfish species that are critical to our tuna, salmon, steelhead, bottomfish, halibut and a multitude of other species. As stocks around the globe continue to decline, demand for our nation's ocean resources will continue to soar. Ex-vessel values will climb for all species linked to this and other baitfish resources. It makes good sense to protect these species now before it is too late.

Thank you for considering this important action.

Bob Rees, President  
NW Guides and Anglers Association

The Council received 2,733 of these letters before the June advance briefing book deadline.



PFMC Comments - NOAA Service Account <pfmc.comments@noaa.gov>

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## Protect Pacific saury, critical food for ocean wildlife

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**Teresa Haller** <harleylife4ever@netscape.net>

Thu, May 23, 2013 at 1:02 PM

Reply-To: Teresa Haller <harleylife4ever@netscape.net>

To: pfmc.comments@noaa.gov

May 23, 2013

Chairman Wolford and Council Members

Dear and Council Members,

I am writing to thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean. Now I encourage you to take the next step and remove Pacific saury from the list of authorized fisheries. Saury is an important forage fish for many highly migratory species of sharks and tuna.

Leaving saury on an updated list of preapproved fisheries would be inconsistent with the council's unanimous adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. An abundance of forage fish helps to maintain the marine environment we all care about. It makes good sense that the ecosystem plan's first order of business is to protect currently unmanaged forage fish species--like saury--because it is linked to so many strands of the ocean's food web.

If saury remains on the preapproved list, there is nothing to prevent new fisheries from targeting this important prey fish without any restrictions and no consideration about the effect on predators. In fact, a new fishery could begin without notifying the council. I encourage you to revise the current list of preauthorized fisheries so there is a chance to ask important questions before a new fishery begins.

Once you've removed saury from the list, the council should proceed to establish long-term protections by bringing saury and other currently unmanaged forage fish into appropriate management plans beginning in September. Taking this next step will enable the council to prevent unregulated fishing on important prey species.

Thank you for considering my comments and for your continued commitment to a productive marine environment.

Sincerely,

Mrs. Teresa Haller  
8400 Central Ave  
Orangevale, CA 95662-3225  
(961) 429-5518



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

**Re: Remove Pacific saury from the List of Authorized Fisheries  
and Gear**

Dear Chairman Wolford and Council Members:

I write today on behalf of the National Wildlife Federation's over four million members and supporters, and 48 state and territorial affiliated organizations to thank you for unanimously adopting the Pacific Fishery Ecosystem Plan and to urge you to remove Pacific saury from the revised List of Authorized Fisheries. With the adoption of the ecosystem plan, the Council committed to implement protections for currently unexploited forage fish. Allowing a pre-approved fishery for Pacific saury would not align with this goal, especially with their importance as a food source for highly migratory species like albacore tuna and sharks.

The NWF seeks balanced, common-sense solutions to environmental problems that work for wildlife and people. We agree with the Council's decision to make implementing protections for unmanaged forage fish the first priority under your ecosystem plan because they are linked to so many strands of the ocean's food web. Forage fish sustain marine mammals, seabirds and commercially and recreationally valuable fish like salmon, tuna and cod. For such an ecologically important tier of the food web, the last thing we need is an unregulated high-volume fishery to serve as a new source of chicken feed or bait shipped overseas.

Unfortunately, right now there is nothing to prevent a new fishery from starting at any time with no restrictions and no consideration about how it affects the rest of the food web. The Council can begin to change this dynamic when it meets this June in Garden Grove. By updating the List of Authorized Fisheries, decision managers will give themselves a

chance to ask important questions before a fishery begins rather than after. Once you've put in place a notification requirement, we urge you to continue working to establish long-term protection for prey species by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Nicholas Callero ><(((^>  
National Wildlife Federation  
Regional Outreach Coordinator  
C: 503.977.5467 O: 206.577.1415

May 28, 2013

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

**RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear**

Dear Chairman Wolford,

We are writing to express our support for your effort to revise and update the Pacific Fishery Management Council's (Council) List of Authorized Fisheries and Gear (List). We urge the Council to approve proposed revisions to the List at this meeting so that it contains only current West Coast fisheries operating in federal waters, and to transmit those recommendations to the National Marine Fisheries Service (NMFS) for implementation. We further request that the purse seine fishery for Pacific saury be stricken from the List, as this species is unmanaged, the fishery has not been conducted for decades, and saury is a critical forage species that must be protected pursuant to the Council's ecosystem-based initiative #1.<sup>1</sup>

By taking this action, the Council will better prepare itself to address future proposals to develop new fisheries because any new fishing activity would have to adhere to a notification requirement and a 90-day waiting period before proceeding. This small window for conservation planning would give the Council the opportunity to petition NMFS to block the proposed fishing activity for up to one year if analysis indicates that it would compromise the effectiveness of conservation and management efforts under the MSA. As explained below, because of loopholes in the current List, new fisheries could begin without any required notification or request for Council approval.

Regarding Pacific saury, we request that it be removed from the List for two reasons. First, there is currently no U.S. fishery for this unmanaged species, and there has not been one for roughly 40 years. Second, according to the preliminary summary of lower-trophic-level (forage) species included in the Fishery Ecosystem Plan (FEP) initiatives document<sup>2</sup>, Pacific saury is an unmanaged forage species eligible for protection under initiative #1; the intent of which is to prohibit new fisheries on forage species until the Council can assess any potential negative impacts.<sup>3</sup> Below we present a more detailed rationale for these recommendations.

**The List of Authorized Fisheries and Gear**

The List is required under section 305(a) of the Magnuson-Stevens Fishery Conservation and Management Act (MSA) (16 U.S.C. §1855(a)). This section describes what the List is and calls

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<sup>1</sup> PPMC. February 2013. Pacific Coast Fishery Ecosystem Plan. Public Review Draft of Ecosystem Initiatives Appendix. Page A-4.

<sup>2</sup> *Ibid.* p.11

<sup>3</sup> *Ibid.* p.4.



for the establishment of guidelines describing how to determine whether a newly proposed fishing activity is sufficiently different from those already listed and thus would require notification. This section goes on to establish the notification process and potential response mechanisms (emergency regulations) available to the Council and the Secretary of Commerce.

The Code of Federal Regulations at [50 CFR 600.747](#) goes further by specifying how to determine whether a fishery requires notification, describing the procedure for providing notification to the Council, and providing further detail on the potential responses to the notification depending on whether a Council finds that the newly proposed fishery would compromise its existing conservation and management efforts.

Upon implementation of the List in 1999, NMFS issued a press release that included the following quote from Penny Dalton, then Director of NMFS:

*“We can now proactively manage new gear or fisheries. In the past, fishermen were free to fish for any species or use any gear unless managers took action to restrict them. These new regulations are part of a precautionary approach to fisheries management...”<sup>4</sup>*

Unfortunately, the fact that the List for every regional Council includes pre-authorized commercial and recreational fisheries for species that are not managed in Fishery Management Plans (FMP) undermines the precautionary approach described by Ms. Dalton. The broad categories in the List effectively mean that no notification or review is required before starting a new fishery.

## **June 2012 Motion**

At its June 2012 meeting, the Council passed a motion that established a management objective to protect unmanaged forage species, and laid out a process for achieving that objective. The first stage in that process was to update and revise the List. Specifically, the motion directed that:

*“A. Regarding the LOF (List of Authorized Fisheries and Gear), all Council advisory bodies shall be tasked with identifying 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,<sup>5</sup> for incorporation into the updated List. This exercise shall be completed by the advisory bodies and provided to the EPDT (Ecosystem Plan Development Team) as soon as possible after completion of the FEP.*

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<sup>4</sup> NMFS. 1999. Press Release: NOAA Fisheries Implements List of Allowable Fisheries; Gear. Available at: <http://www.publicaffairs.noaa.gov/releases99/dec99/noaa99081.html>

<sup>5</sup> Emphasis added

*B. For state-managed fisheries, the states shall be responsible, through their EPDT representatives, for preparing the list of state-managed fisheries which have a nexus with Federal waters, for inclusion in the updated List.”<sup>6</sup>*

The current iteration of the List at [50 CFR 600.725\(v\)](#) requires substantive revisions to ensure that it accurately reflects only current fisheries and also to effectively implement the notification requirement and waiting period for newly proposed fisheries described at [50 CFR 600.747](#). First, the List presently includes fisheries that no longer exist and/or for which there are no management measures or regulations, such as the seine fishery for Pacific saury. These fisheries must be removed from the List to comply with the June 2012 motion.

Second, the List also includes two broad catch-all categories for both commercial and recreational fisheries on species that are not managed under a Council FMP. Fishing gears authorized under these two categories include most known gear types typically used in commercial and recreational fisheries.<sup>7</sup> As stated above, this loophole means that no notification or approval from the Council is required of anyone wishing to commercially or recreationally harvest any non-FMP species using an authorized gear.

We have also heard concerns that updating the List should not unduly constrain or otherwise restrict any existing fishery. Regarding this concern, the Council’s Fishery Ecosystem Plan states:

*“Potential revisions to this table should consider only those fisheries that occur wholly or partially within federal waters. No revision to the table should have the effect of prohibiting currently legal directed fisheries or incidental catch.”<sup>8</sup>*

We offer two comments regarding this issue. First, it is important to note that removing a fishery from the List does not prohibit that fishery from occurring in the future. The only additional constraint imposed by removal from the List is the notification requirement and waiting period described at [50 CFR 600.747](#). Second, the above quote seems to imply that any species that may potentially be caught incidentally in an authorized fishery must be included on the List. This should not be the case, otherwise every potential bycatch species from every Council managed fishery would need to be included.

## **Notification Requirement and Process**

Notification is required for the development of any new fishery that is not already authorized by a regional Council’s List. No new fishing activity may occur without 90-day advance notice to the appropriate Council. Upon receipt of a complete application, the Council has a 90-day window to review and consider the new proposed fishery. If the Council finds that the proposed

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<sup>6</sup> PPMC. June 2012. Supplemental Revised Council Action on Consideration of Further Protection of Currently Unmanaged Forage Species. Agenda Item G.1.d.

<sup>7</sup> The recreational category includes spear, trap, handline, pot hook and line, rod and reel, and hand harvest. The commercial category includes trawl, gillnet, hook and line, longline, handline, rod and reel, bankdit gear, cast net and spear.

<sup>8</sup> PPMC. February 2013. Pacific Coast Fishery Ecosystem Plan. Public Review Draft of Ecosystem Initiatives Appendix. Page A-5.

fishery would not compromise its existing conservation and management efforts, it would request that NMFS update the List to reflect the newly operating fishery. If the Council finds otherwise and wishes to prohibit or postpone the activity, it would need to petition NMFS to implement emergency or interim regulations to prohibit the new fishing activity, and take action through a new or existing FMP to establish permanent regulations for the proposed fishery. Depending on whether or not NMFS agrees with the Council's finding, it can either publish emergency regulations to prohibit the new fishery, or publish a proposed rule in the Federal Register and request public comment on the merits of the potential fishery prior to making a determination.

There are a few key points to bear in mind regarding this notification process. First, the two broad catch-all commercial and recreational categories will need to be stricken from the List for the notification process to be required for any new fishery. Second, if a fishery were proposed that could possibly have negative impacts on the ecosystem and/or other managed fisheries, the Council would be in a position where it would have to:

- Rely on NMFS to agree with the Council's finding of potential negative impact.
- Rely on NMFS to promulgate emergency regulations to prohibit the fishery within the 90-day waiting period, with such regulations only enforceable for 180 days.
- Begin work on amending an existing FMP to establish permanent regulations for the proposed fishery before NMFS could extend the temporary prohibition for another 180 days (allowing up to a one-year delay on the proposed activity).

Relying on NMFS to agree with the Council's findings and act within 90 day period to temporarily prevent a harmful new fishery is problematic. Fisheries should only be allowed after they have been found to not pose any negative impacts to existing fisheries or the broader ecosystem. The best way to implement this approach to developing fisheries is through the regulatory FMPs over which the Councils have authority, not by asking the agency to take emergency action with an uncertain outcome.

## **Pacific saury**

Pacific saury is a small to medium sized (22-28cm) pelagic schooling fish found throughout the North Pacific Ocean. It is an important forage species for a wide range of marine predators, in particular for highly migratory species such as tunas and sharks. It is primarily an offshore species that becomes abundant during cold ocean regimes, such as la Niña periods.<sup>9</sup>

Pacific saury is one of the most popular food fishes in Japan and Korea. It is also used as bait in hook & line fisheries throughout the world. Global landings of Pacific saury fluctuate between ~200,000 - ~600,000mt, with most production coming from Japan, Korea, Taiwan, Thailand and Russia.<sup>10</sup> Pacific saury is primarily caught commercially with purse seine, lampara, dip net and trawl gear.

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<sup>9</sup> PFMC. February 2013. Pacific Coast Fishery Ecosystem Plan. Public Review Draft of Ecosystem Initiatives Appendix. Page A-11.

<sup>10</sup> FAO. 2010. Species Fact Sheet: *Cololabis saira*. Available at: <http://www.fao.org/fishery/species/3001/en>

There is currently no commercial or recreational fishery for Pacific saury in the U.S. Exclusive Economic Zone. It is not managed by or under the jurisdiction of any state or the federal government. Any Pacific saury use or consumption in the U.S. comes from Asian imports.<sup>11</sup> In the 1950's, following the collapse of the Pacific sardine fishery, there was interest and attempts at establishing a commercial fishery for Pacific saury off the U.S. West Coast, both by domestic and Japanese vessels. After several Western stocks such as anchovy and mackerel rebounded in the mid 1970's, efforts to harvest Pacific saury were discontinued.<sup>12</sup> However, because of its large biomass and availability, it will remain at risk of being fished without regulations until it is removed from the List.

Currently, the List includes a pre-authorized commercial purse seine fishery for Pacific saury. This means that a purse seine fishery for Pacific saury may begin at any time, without notification to the federal government or to the Council and without any sort of catch limit or fishery specific regulations. This policy is problematic because Pacific saury is ecologically critical as prey for a wide variety of marine wildlife, including commercially and recreationally valuable species. The schooling characteristic of Pacific saury that makes them so attractive to predators also renders them susceptible to industrial purse seine fisheries. Unregulated harvest of Pacific saury could lead to depletion of the species and cause negative impacts on ecosystem structure and function. This is precisely why it is included in the preliminary summary of lower-trophic level (forage) species developed by the EPDT for consideration in implementing ecosystem-based initiative #1. For these reasons, this pre-authorized fishery for which there is no scientific information or management measures must be removed from the List.

## **Ecosystem-Based Fishery Management**

Ecosystem-based management is a foundational principle for ocean resource management in the United States.<sup>13</sup> Ecosystem-based fisheries management (EBFM) approaches have been incrementally implemented by regional Councils over the last several decades. As early as 1998, the Ecosystem Principles Advisory Panel, convened by the National Marine Fisheries Service at the request of Congress, produced a report which found that EBFM “will contribute to the stability of employment and economic activity in the fishing industry and to the protection of marine biodiversity on which fisheries depend.”<sup>14</sup> Since that time, the body of knowledge on EBFM has grown along with calls from government scientists and fishery managers as well as the fishing industry itself, lauding its merits and advocating its implementation. For example, in 2005 the Pacific States Marine Fisheries Commission convened a panel of scientists to identify a process to help Regional Councils “move forward in incremental ways, from the existing

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<sup>11</sup> Love, Milton. 1996. *Probably More Than You Want To Know About the Fishes of the Pacific Coast*. Really Big Press. Santa Barbara, CA. p.134

<sup>12</sup> NMFS. SWFSC. 1992. Technical Memorandum 9251: Underutilized Species. p. 199-201. Available at: <http://swfsc.noaa.gov/publications/CR/1992/9251.PDF>

<sup>13</sup> NMFS. 2012. *Ecosystem-Based Fisheries Management*. New Council Member Training. Available at: [http://www.nmfs.noaa.gov/sfa/reg\\_svcs/Councils/Training2012/O\\_Eco\\_FishManagement.pdf](http://www.nmfs.noaa.gov/sfa/reg_svcs/Councils/Training2012/O_Eco_FishManagement.pdf)

<sup>14</sup> National Marine Fisheries Service (NMFS). 1999. *Ecosystem-Based Fishery Management. A Report to Congress by the Ecosystem Principles Advisory Panel*. United States Department of Commerce, National Oceanic and Atmospheric Administration, NMFS, Silver Springs, Maryland.

management approaches that generally consider ecosystem interactions in an implicit and often peripheral way, to a management system that, over time, would incorporate explicit EBFM considerations into the fishery assessments themselves.”<sup>15</sup>

Commonly found in much of the literature on the subject of EBFM is the recognition that while a lack of scientific knowledge is a barrier to full implementation, there are certain first steps and actions that can be taken under our current management framework and understanding of ecosystem science. According to the EPAP report and others, chief among those is to reverse the burden of proof on the development of new fisheries.<sup>16</sup>

*The modus operandi for fisheries management should change from the traditional mode of restricting fishing activity only after it has demonstrated an unacceptable impact, to a future mode of only allowing fishing activity that can be reasonably expected to operate without unacceptable impacts.*

By updating and revising the List to reflect only those fisheries that currently exist, the Council is truly taking that small but critical first precautionary step recommended by the EPAP and described by the head of NMFS when the List was first published in 1999. Furthermore, while the Council continues to pursue FMP-level protections to prevent new fisheries on unmanaged forage species until adequate science and management measures are in place, this revised List provides an interim level of protection until legally binding regulations can be put in place.

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

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<sup>15</sup> Pacific States Marine Fisheries Commission (PSMFC). 2005. *Strengthening Scientific Input and Ecosystem-Based Fishery Management for the Pacific and North Pacific Fishery Management Councils*. Suggestions from a panel discussion. July 19-20, 2005. Seattle, Washington.

<sup>16</sup> See EPAP Report, Mangel, M. et al. 1996. Principles for the conservation of wild living resources. *Ecological Applications* 6(2):338-362., Sissenwine, M. P. 1987. Councils, NMFS, and the Law. Pages 203-204 in: R. Stroud (ed.) *Recreational Fisheries* (11). Sport Fishing Institute. Washington, D. C., Dayton, P. K. 1998. Reversals of the burden of proof in fisheries management. *Science* 279:821-822.



## Port Orford Ocean Resource Team

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May 26, 2013

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

Dear Chairman Wolford and Council Members:

I am writing to thank the Council for adopting a Fishery Ecosystem Plan last month and starting to shift management of our West Coast fisheries toward an ecosystem-based approach. I encourage you to avoid undermining this important milestone by pre-authorizing a fishery targeting Pacific saury, an important food source for commercially valuable species such as albacore tuna.

Saury and other forage species are the key link in a productive marine food web that supports the coastal fishing and tourism economy in Port Orford, meaning these species have real economic value when left in water. An abundance of forage fish helps support our ocean ecosystem and maintain the marine environment we all care about. Our fishermen recently launched a Community Supported Fishery, allowing people from around the state to share in supporting our local fishermen and our sustainable fishing model. We call on the Council to help support our fisheries and the community that depends on healthy stocks of tuna, lingcod, rockfish and salmon.

If saury remains on a pre-approved list there is nothing to prevent new fisheries that target this important prey fish with no restrictions and no consideration about the effect on predators. This would be especially discouraging in light of the council's adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. We encourage the Council to revise your current list of fisheries so that you provide yourself a chance to ask important questions before a new fishery begins rather than after. Once the Council updates the list of authorized fisheries, you should begin work on establishing long-term protection for these



## Port Orford Ocean Resource Team

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species by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

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. Thank you for considering my comments and for your continued commitment to a productive marine environment. We look forward to engaging in this process as the Council moves forward on its Ecosystem Initiative.

Sincerely,

A handwritten signature in black ink that reads "Leesa Cobb".

**Leesa Cobb**  
Executive Director





June 12, 2013

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

**RE: Agenda Item H.1, Updating the Federal List of Authorized Fisheries and Gear**

Dear Chairman Wolford and Council Members:

We write to commend the Pacific Fishery Management Council for adopting the Fishery Ecosystem Plan and proceeding with Ecosystem Initiative No. 1 to protect unmanaged forage species. This action represents a step forward in advancing sustainable fisheries management off the West Coast. To that end, we offer a few thoughts on today's agenda item—revisions to the Federal List of Authorized Fisheries and Gear.

Revising the Federal List is an initial measure intended to help get a better handle on future development of fisheries on unmanaged forage species. By tailoring the Federal List to accurately match existing fisheries off the West Coast, the Council effectively creates a notice requirement for anyone intending to prosecute a new fishery. See 50 C.F.R. § 600.725(v) (requiring those intending to start a new fishery not on the Federal List to provide the Council with 90 days' notice).

Our organizations support cleaning up the Federal List as an important first step in protecting unmanaged forage species. We urge the Council to remove all species and/or gears not currently fished from the Federal List, such the mention of Pacific saury in the purse seine fishery. If currently-unfished species or gears are retained on the Federal List, it will effectively pre-authorize those types of fishing, and undermine the 90-day notice requirement.

We also recommend the Council edit the Federal List to make its descriptions use "the most narrow and specific terms possible," per the Council's June 2012 motion. See Pacific Fishery Management Council



June 2012 Voting Log, Motion 16 (p.8), *available at* [http://www.pcouncil.org/wp-content/uploads/FINAL\\_June\\_2012\\_Voting\\_Log.pdf](http://www.pcouncil.org/wp-content/uploads/FINAL_June_2012_Voting_Log.pdf). Because overly broad descriptions risk pre-authorizing fisheries, the Council should scrutinize the fisheries and species appearing on the Federal List to make sure they are indeed actively being fished.

For similar reasons, we also urge revision to remove broad or catch-all categories of fishing activity from the Federal List, such as existing fisheries #20 and #21, which establish generic non-federal recreational and commercial fisheries. These types of categories are contrary to the intent of the Federal List and the June 2012 motion directing a “narrow and specific” Federal List. *Id.*

Once these revisions to the Federal List are done, the Council must move forward with full FMP-level protections for forage species. Simply updating the Federal List will not fulfill the Council’s stated goal of creating a red-light system for new fisheries on forage species, because as noted above, removal from the Federal List simply creates a notice requirement.

Thank you for your continued commitment to protecting forage species and maintaining a vibrant California Current marine ecosystem.

Sincerely,



Greg Helms  
Pacific Program Manager  
Ocean Conservancy



Seth Atkinson  
Oceans Program Attorney  
Natural Resources Defense Council

/s/ Sarah Winter Whelan

Regional Marine Conservation  
Project Director  
American Littoral Society

----- Forwarded message -----  
From: **Ken Lindsay** <[ken@fishermensspot.com](mailto:ken@fishermensspot.com)>  
Date: Wed, Jun 12, 2013 at 11:30 AM  
Subject: Agenda Item H.1  
To: [pmmc.comments@noaa.gov](mailto:pmmc.comments@noaa.gov)

Dear Chairman Wolford and Council Members,

As a business owner whose livelihood is tied to our natural resources, I am writing to thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean. I encourage you to avoid undermining this important milestone by pre-authorizing a fishery targeting Pacific saury, an important forage fish for migratory species such as sharks and albacore tuna. This species' continued health is vital for all the other species in the food chain.

Leaving saury on an updated list of pre-approved fisheries would be especially disheartening in light of the council's unanimous adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. An abundance of forage fish helps to maintain the marine environment we all care about. It makes good sense that the ecosystem plan's first order of business is to protect currently unmanaged forage fish species – like saury – because they are linked to so many strands of the ocean's food web.

If saury remains on a pre-approved list there is nothing to prevent new fisheries that target this important prey fish with no restrictions and no consideration about the effect on predators. In fact, a new fishery can begin without so much as a heads-up to the council. I encourage the council to revise your current list of fisheries so that you provide yourself a chance to ask important questions before a new fishery begins rather than after.

Once you've put in place a notification requirement, the council should move on to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

Thank you for considering my comments and for your continued commitment to a productive marine environment.

Sincerely,

Ken Lindsay

Fishermen's Spot

14411 Burbank Blvd.,

Van Nuys, CA 91401

[\(818\) 785-7306](tel:(818)785-7306)

[www.fishermensspot.com](http://www.fishermensspot.com)



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June 12, 2013

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

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and Council Members,

I am grateful for the work the Pacific Fishery Management Council (PFMC) performs, in particular, the recent unanimous decision to adopt its first fishery ecosystem plan. The implementation of this FEP ushers in a new era in fishery management, which recognizes the interconnectedness of everything in the ocean. As the chef at Alchemy Cultural Fare & Cocktails, a southern California restaurant based out of San Diego, it is my food philosophy to let the products speak for themselves. I focus on the many local products that California and our Pacific coast have to offer. The diverse menu at Alchemy is a testament to my ideals, eclectic background, and commitment to sustainability. I am aware of the effects of a productive marine environment on the food that I serve to my diners, which is why Alchemy has set out to educate the community on the importance of local and sustainable food.

It has been brought to my attention that forage fish play a crucial role as the middle link in the ocean food web, as essential nutrition for species of fish that the customers at Alchemy love to eat. Due to their small size and tendency to travel in dense schools, forage fish are especially susceptible to mass fishing and depletion, which in turn affects commercial fish and the coastal economies that depend on them. This awareness has sparked an interest in me to engage in the management processes that determine what happens in the waters off of our coast.

I am urging the Council to take action at the June Pacific Fishery Management Council (PFMC) meeting by revising the current list of fisheries that target unmanaged forage fish until there is enough information and science in place to manage them in a sustainable manner. It is undoubtedly necessary that the Council make the preservation of forage fish- like Pacific saury- a priority. If Pacific saury remains on a pre-approved list, there are no restrictions or considerations about the effect on predator fish to prevent new fisheries that target this important prey fish. History has shown us how detrimental the depletion of the forage fish population can be on the entire marine ecosystem, which is why it is

important for the Council to consider the benefits of precautionary management over conventional management.

Once this speed bump is erected and a notification requirement is put in place, the council should move on to establish long-term protection by incorporating Pacific saury and other currently unmanaged forage fish into appropriate fishery management plans beginning in September.

I appreciate the opportunity to offer my comments, as well as your continued commitment to ensure a balanced and productive marine food web.

Sincerely,

Ricardo Heredia  
Chef, Alchemy Cultural Fare & Cocktails

# ONE MARKET

R E S T A U R A N T

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

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and Council Members,

I am writing to thank the Council for the work it performs in the interest of a productive marine environment, especially for recently adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean. As the chef/partner of One Market Restaurant, a northern California establishment located in San Francisco, I make it a point each day to serve food that is created by blending the freshest, seasonal ingredients from California and off of our coast. My approach to cooking ensures that the menu is a true reflection of the finest raw materials used, which stems from the restaurant's commitment to sustainability. This would not be possible without a healthy Pacific Ocean.

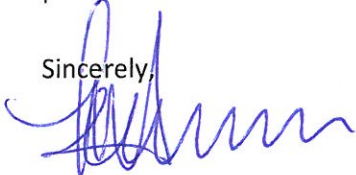
I have recently become aware of the importance of forage fish, and the vital role they play as a middle link in the marine food web. The fact that these forage fish provide essential nutrition for the species of fish that I love to serve to my customers cannot be denied. As a result, I am concerned that the depletion of forage fish will have a direct, negative impact on the many species they sustain, such as marine mammals, seabirds, and bigger fish, like salmon, marlin, tuna, and cod.

I am requesting that the Council take action at the June Pacific Fishery Management Council (PFMC) meeting by making the preservation of forage fish- like saury- a priority. An abundance of forage fish helps to maintain the marine environment we all care about. The Pacific saury, in particular, plays a pivotal role in the food web for migratory species such as sharks, marlin, and albacore tuna. I encourage the council to revise your current list of fisheries so that you provide yourself a chance to ask important questions before a new fishery begins, rather than after.

Once a notification requirement is implemented, the council should move expeditiously to establish long-term protection by incorporating Pacific saury and other currently unmanaged forage fish into appropriate fishery management plans beginning in September.

Thank you for considering my comments and for your continued commitment to a healthy and productive Pacific Ocean.

Sincerely,



Mark Dommen  
Chef/Partner, One Market Restaurant

June 12, 2013

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

**RE: [Agenda Item H.1.](#), Updating the Federal List of Authorized Fisheries and Gear**

Dear Chairman Wolford and Council Members,

I am the founder of the sustainable sushi restaurants *Tataki Sushi Bar*, *Tataki South*, and *Tataki Canyon*. On the behalf of these restaurants and of the other members of the rapidly growing sustainable sushi movement, I am contacting you to ask that you remove the Pacific saury from the list of allowable fisheries under the current Fishery Ecosystem Plan.

The sustainable sushi movement consists of restaurateurs and chefs that believe that sushi cannot continue to exist without a healthy and productive ocean ecosystem, and thus offer sustainable, local, and seasonal options instead of environmentally dubious conventional species such as bluefin tuna, hamachi, and freshwater eel. Pacific saury is one of many species that member restaurants of the sustainable sushi movement depend on. It is a healthy and plentiful option that is affordable and delicious, and can be used to great effect in the place of other less defensible choices. That said, abundance does not equate to sustainability, and no doubt the saury will go the way of other depleted populations if it does not receive the effective management measures that it deserves.

Leaving Pacific saury on an updated list of pre-approved fisheries would be detrimental to the council's recent progress in light of the unanimous adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. Forage fish are crucial to maintaining marine environment we all care about. It makes good sense that the ecosystem plan's first order of business is to protect currently unmanaged forage fish species – like Pacific saury – because they are linked to so many strands of the ocean's food web. Unfortunately, right now there is nothing to prevent a new Pacific saury fishery starting at any time with no restrictions and no consideration about how it affects the rest of the food web.

It is imperative that the Council removes Pacific saury when it updates the Federal List of Authorized Fisheries and Gear, thereby requiring notification before fishing can begin. Once a notification requirement is implemented, the Council must keep the momentum going and establish long-term protection by incorporating Pacific saury and other currently unmanaged forage fish into appropriate fishery management plans beginning in September.

I greatly appreciate you considering my comments as well as your continued commitment to a healthy ocean ecosystem for current and future generations.

Sincerely,

Casson Trenor  
Tataki Sushi Bar



----- Forwarded message -----

From: **Lance Morgan** <[Lance.Morgan@marine-conservation.org](mailto:Lance.Morgan@marine-conservation.org)>  
Date: Wed, Jun 12, 2013 at 8:49 PM  
Subject: Agenda Item H.1  
To: "[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)" <[pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)>

Dear Chairman Wolford and Council Members,

On behalf of the Marine Conservation Institute, I wish to thank the council for adopting a Fishery Ecosystem Plan that recognizes how everything is connected in the ocean. I encourage you to avoid undermining this important milestone by pre-authorizing a fishery targeting Pacific saury, an important forage fish for migratory species such as sharks and albacore tuna.

Leaving saury on an updated list of pre-approved fisheries would be especially disheartening in light of the council's unanimous adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. An abundance of forage fish helps to maintain the marine environment we all care about. It makes good sense that the ecosystem plan's first order of business is to protect currently unmanaged forage fish species – like saury – because they are linked to so many strands of the ocean's food web.

If saury remains on a pre-approved list there is nothing to prevent new fisheries that target this important prey fish with no restrictions and no consideration about the effect on predators. In fact, a new fishery can begin without so much as a heads-up to the council. I encourage the council to revise your current list of fisheries so that you provide yourself a chance to ask important questions before a new fishery begins rather than after.

Once you've put in place a notification requirement, the council should move on to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

Thank you for considering my comments and for your continued commitment to a productive marine environment.

Sincerely,

Lance Morgan

**Lance Morgan, PhD**  
*President and CEO*

[Lance.Morgan@marine-conservation.org](mailto:Lance.Morgan@marine-conservation.org)

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*Saving wild ocean places, for us and future generations*

June 11, 2013

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

**RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear**

Dear Chairman Wolford and Council Members,

I would like to thank you on behalf of Shark Stewards, a nonprofit organization working for sound stewardship of the oceans and all ocean life, for adopting a Fishery Ecosystem Plan. This recognition of the interconnected nature of the ocean is the first step in a very important process to understanding and promoting a health ocean. I am writing to encourage the PFMC to continue their momentum by removing Pacific saury from the pre-authorized list of allowed fisheries. Saury is an important fish for migratory species like marlin, sharks and albacore tuna.

We at Shark Stewards focus on organizing individuals to advocate the importance of a healthy ocean from the top to the bottom of the food web. Increasingly, scientific evidence is indicating that species at the bottom of the food web can have bottom up impacts on the ecosystem, impacting species like salmon and other important commercial species. These forage fish are increasingly important Our work with predatory species such as sharks, swordfish and Bluefin tuna has shown their vital importance to the food web. Apex predators like salmon sharks that prey in our waters depend upon this species as an important part of their diet.

Top predators depend greatly on forage fish like Pacific saury and sardines, which act as the energy transfer from plankton to prey and are important components of a healthy ocean. These small fish play a great role supporting important wildlife and fisheries in the California Coastal Upwelling Zone. We are concerned that the life cycles and the population demographics of these fish, often harvested as bait, are not adequately assessed.

We urge you to fulfill your commitment to prohibit new fisheries targeting forage species that aren't yet being fished without proper understanding of their biology, their natural history and

the cyclical fluctuations that these fish populations are known to incur. Therefore we urge the council to remove Pacific saury from its List of Authorized Fisheries and Gear, thereby requiring notification before fishing could begin.

Our coastal ecosystem is under increasing pressure not only from fishing but pollution and other direct and indirect impacts. Unfortunately, right now there is nothing to prevent a new forage fishery from starting at any time with no restrictions and no consideration about how it affects the rest of the food web. A resilient ecosystem depends first and foremost on a balanced food web, which is why conservation of prey fish is widely recognized as a pillar of ecosystem-based fishery management.

I encourage the council to revise the list of Pacific fisheries, to ensure that there are basic protections in place for Pacific saury, and continue to establish a meaningful Fishery Ecosystem Plan. Furthermore, once a notification process has been added to the management of this important prey fish to high-value predators, the council should move forward with amending management plans for currently unmanaged forage fish species beginning in September.

Thank you for your stewardship of our marine resources.

QuickTime™ and a  
decompressor  
are needed to see this picture.

David McGuire, MPH  
Director, Shark Stewards  
Sausalito CA  
[415.350.3790](tel:415.350.3790)  
[www.sharkstewards.org](http://www.sharkstewards.org)



June 12, 2013

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

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and Council Members,

I am grateful for the work the Council performs, especially its recent unanimous decision to adopt the first Pacific Fishery Ecosystem Plan (FEP), which begins to consider the interconnectedness of everything in the ocean. As the operations manager at The Beach House restaurants, family owned and operated sister restaurants located in Orange and San Diego counties, the quality of the food served has always been a priority. Our first restaurant was founded over 40 years ago, and our continued success is a testament to the menu and service we provide our diners. I realize that this would not be possible without a healthy and productive Pacific ocean food web.

I have recently become aware of the fact that forage fish play a crucial middle link in the marine food web as vital nutrition for many species of larger fish that customers at The Beach House have enjoyed over the years. Therefore, it makes sense that the plan's first priority be to protect forage species that are not managed. Currently, there is nothing to prevent a new forage fishery from starting at any time, with no restrictions or consideration about how it affects the rest of the food web. The Council can begin to change this dynamic when it meets June 24th in Garden Grove, CA.

I am requesting that you take action immediately to prevent the development of new fisheries on forage species that are not currently managed until the important role they play in the ecosystem can be taken into account. It is necessary for you to update the Federal List of Authorized Fisheries and Gear and remove unmanaged forage fish, like Pacific saury, from this pre-approved list, thereby requiring notification before fishing could begin. Pacific saury is an

important forage fish for migratory species such as sharks, marlin, and albacore tuna. Forage fish are an ecologically important tier of the food web, and it is essential to manage them in a sustainable manner.

Updating this pre-approved list will not suffice in the long run. Once a notification requirement has been put in place, the Council must move on to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

I appreciate the opportunity to offer my support for forage species fishery management, and am grateful for your continued commitment to a productive marine environment.

Sincerely,

Noah Pike, Operations Manager  
The Beach House

June 12, 2013

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

**RE: Agenda Item H.1. Ecosystem Based Management: Update List of Fisheries**

Dear Chairman Wolford and members of the Council:

Thank you for your continued leadership toward protecting forage fish in the California Current Large Marine Ecosystem. Given the crucial ecological role of these small schooling fish and invertebrates in marine ecosystems, the conservation and management of forage species has received increasing national and international attention in recent years, as well as by this Council. As you are aware, forage fish are highly valuable both ecologically and economically as prey; and when forage fish populations decline, so do dependent marine predators like salmon and whales.<sup>1</sup> We continue to fully support the Council's "intent to recognize the importance of forage fish to the marine ecosystem off our coast" and the Council's objective "to prohibit the development of new directed fisheries on forage species..."<sup>2</sup> We are writing now to request that the Council recommend that the National Marine Fisheries Service (NMFS) update the federal list of fisheries gear "in the most specific and narrow terms possible" to reflect current fisheries and gear "operating in the U.S. Exclusive Economic Zone (EEZ) off each state".<sup>3</sup> We also request that the Council prioritize action to prohibit the development of new directed fisheries on forage species by initiating a Fishery Management Plan (FMP) amendment process during the September meeting.

**1. Amending the 'list of allowable fisheries' is a commendable procedural notice measure but will not adequately prevent new directed fisheries on forage species**

We commend the Council for moving forward with amending the "list of allowable fisheries" as it will serve to ensure that notification is given to the Council before certain types of new fisheries proceed off the West Coast. As we have previously stated in testimony and in writing, however, the NMFS list of authorized fisheries and gear does not provide a viable option to prohibiting the development of new fisheries targeting forage species. This list of authorized fisheries is compiled and managed pursuant to Section 305(a) of the Magnuson-Stevens Fishery Conservation and Management Act ("Magnuson-Stevens Act"). Section 305 states that within 180 days of the publication of the authorized fisheries list, "no person or vessel may employ

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<sup>1</sup> Pikitch, E., Boersma, P.D., Boyd, I.L., Conover, D.O., Cury, P., Essington, T., Heppell, S.S., Houde, E.D., Mangel, M., Pauly, D., Plagányi, É., Sainsbury, K., and Steneck, R.S. 2012. Little Fish, Big Impact: Managing a Crucial Link in Ocean Food Webs. Lenfest Ocean Program. Washington, DC. 108 pp.

<sup>2</sup> PFMC. June 2012. Agenda Item G.1.d Supplemental Revised Final Council Action.

<sup>3</sup> Ibid.



fishing gear or engage in a fishery not included on such list without giving 90 days advance written notice to the appropriate Council.”<sup>4</sup>

This MSA provision therefore does not prohibit participation in unlisted fisheries or use of new gear. It only requires that a person give notice and allow the Council and NMFS an opportunity to approve the new fishery or gear use before engaging in it. There are no changes that could be made to the list or federal guidance documents under the current MSA requirements that would turn this into a mechanism to enact a meaningful fishing prohibition on new fisheries for forage fish. If an applicant has given proper notice of his or her intent to use a new gear or fish in an unlisted fishery, and the Council or NMFS does not act within the 90-day waiting period, the applicant may go ahead and use the new gear or participate in the new fishery.<sup>5</sup> In other words, absent some affirmative action by the Council and NMFS, the default assumption is that the new fishery or gear use may proceed.

This Council expressly rejected this approach in 2004 when considering management alternatives for krill. We similarly believe that the list would not be an effective mechanism for implementing a prohibition on new fisheries for forage species because even if the list is amended in a way that clearly removed new forage species from the realm of authorized fisheries, further regulatory action is likely needed to implement the prohibition. If a fishery is simply removed from the list but the prohibition is not enacted in regulation, an interested party need only give the Council and NMFS notice and wait 90 days before engaging in that new fishery. The Council would then have to amend the relevant FMP in order to make the ban permanent and prevent further attempts at opening the new fishery. Therefore, while we support amending the list of fisheries, such action does not adequately accomplish the objective of prohibiting the development of new directed fisheries on currently unmanaged forage species.

## **2. Remove Pacific saury from the draft list of fisheries**

While the list of fisheries is not a mechanism for fully prohibiting the directed harvest of forage species, it nevertheless should be updated. For example, the draft list continues to include a Pacific saury purse seine fishery when in fact there is no Pacific saury fishery operating in the U.S. EEZ off California, Oregon or Washington. Including this on the list of fisheries would contradict the Council’s motion to define “Federal fisheries operating in the U.S. [ ] EEZ...in the most specific and narrow terms possible.” We request the PFMC remove it from the list.

Pacific saury (*Cololabis saira*) is an important forage species. These pelagic schooling fish are highly migratory and found in the North Pacific Ocean, from Japan eastward to the Gulf of Alaska and south to subtropical Mexico.<sup>6</sup> Pacific saury have a high energy content relative to other forage species, and they are preyed upon by a number of whales and dolphins as well as

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<sup>4</sup> 16 U.S.C. § 1855(a)(3).

<sup>5</sup> 64 Fed. Reg. 4030, 4033 (Jan. 27, 1999) (“Unless specifically prohibited by rulemaking, the individual who has served notice may use a gear in an existing fishery or may participate in a new fishery after the 90-day waiting period.”)

<sup>6</sup> Froese, R. and D. Pauly, Editors. 2011 "*Cololabis saira*" in FishBase. [www.fishbase.org](http://www.fishbase.org)

blue sharks, bluefin tuna, albacore and bonito.<sup>7</sup> While there is a major commercial fishery for Pacific saury in the Western Pacific, there are no records of any Pacific saury landings on the U.S. West Coast for the years PacFin data are available from 1981 to 2013.<sup>8</sup> While the PacFin data do not include any Pacific saury landings, they do keep a code for this species suggesting if there were landings they would have been recorded.

### **3. Begin an FMP amendment process to protect currently unmanaged forage fish**

Oceana reiterates its request that the Council and NMFS initiate an FMP amendment process to formally prohibit new fisheries for currently unmanaged forage species. As previously stated, this is the only clear course of action that gives Regional Councils direct management and regulatory authority to prevent new fisheries from developing in the West Coast EEZ. The forage species must be in an FMP either as species that are “in the fishery” or as “ecosystem component” with management measures, for the Council and NMFS to have the ability to manage and protect them. There are examples of both approaches including the prohibition of fishing for Pacific krill (CPS FMP Amendment 12) and the prohibitions of directed fishing for forage species found in the North Pacific Bering Sea, Aleutian Islands and Gulf of Alaska FMPs and Arctic FMP. If a forage species is not in an FMP, the Council simply does not have authority to manage or protect them from directed harvest. Despite several years of analyzing other potential avenues for preventing new fisheries on forage species, inclusion and prohibition through an FMP remains the only clear pathway.

Consistent with the Council’s June 2012 motion on forage fish and Ecosystem Initiative One associated with the PMFC Fishery Ecosystem Plan, we encourage the Council to prioritize this issue for its September 2013 meeting, and at that time make a formal decision to initiate an FMP amendment process to protect forage species. We have proposed such an amendment during the CPS FMP Amendment 13 process, during the Ecosystem Fishery Management Plan (now Fishery Ecosystem Plan) process, and over the last two years, without any substantive opposition to the concept. Most of the work and analysis (list of forage species, regulatory language) has already been completed, and therefore we view an FMP amendment as a straightforward process. Quite simply, if the Council is going to implement its objective to prevent new fisheries from developing on forage species, now is the time to initiate an FMP amendment to do so.

Thank you for your time and consideration. We look forward to continuing to work with the Council and its advisory bodies on this important matter.

Sincerely,



Ben Enticknap  
Pacific Campaign Manager and Senior Scientist

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<sup>7</sup> Ibid.

<sup>8</sup> Pacific Fisheries Information Network (PacFin). 2013. Washington, Oregon and California All Species Report #307, 1981-2013.

----- Forwarded message -----

From: **Garth Murphy** <[garthmy@gmail.com](mailto:garthmy@gmail.com)>

Date: Wed, Jun 12, 2013 at 9:45 PM

Subject: Meeting the 23-24 June 2013

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

Date 12 June 2013

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

From Garth Murphy, Integrated Ecosystems Management, 649 South Vulcan Avenue, Encinitas, CA  
92024

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and Council Members,

I am a second generation Marine Ecologist, my father Garth I Murphy was the founding coordinator of POFI and instrumental in introducing the word ECOLOGY into fisheries management. I worked for two years on the Marine Life Protection Act Initiative South Coast project.

I am very concerned about the state of fish stocks in the California Current and worldwide. At 68 I have personally witnessed drastic falls in populations of all species, and especially those commercially harvested by seining and other net sets.

It is a fools game to expect ocean biomass of commercial fish species to recover without immediate measures to protect all parts of the Marine Food Web. Making a start with Pacific Saury would be nice but is only a first tiny start. We need immediate cross ecosystem action in order to halt and reverse the steady but not inevitable decline of the natural abundance of marine ecosystems and the California Current.

It is ignorant self interest and inaction by managers that are the root causes of these declines that are easy to arrest if there is political will and good public education and therefor support.

I thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean. I would add that every DISCONNECTION is a mistake and counterproductive to your goals.

I thus encourage you to avoid undermining this auspicious start by pre-authorizing a fishery targeting Pacific saury, an important forage fish for migratory species such as sharks, marlin, and albacore tuna as well as all local species.

Leaving saury on an updated list of pre-approved fisheries would be especially disheartening in light of the council's unanimous adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. It makes good sense that the ecosystem plan's first order of business is to protect currently unmanaged forage fish species – like saury – because they are linked to so many strands of the ocean's food web.

If saury remains on a pre-approved list there is nothing to prevent new fisheries that will target this important prey fish with no restrictions. In fact, a new fishery can begin without so much as a heads-up to the council.

I encourage the council to revise your current list of fisheries so that we have a chance to answer important questions before any new fishery begins.

The council should move on immediately to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

The stronger an ecosystem management stance you take, the more efficient and productive your management efforts will be, and the quicker the general marine ecosystem will revert to its historic natural state of abundance, which I presume is the goal of the PFMC.

Thank you for considering my comments and for your continued commitment to a permanently productive marine fisheries ecosystem.

Sincerely,

Garth Murphy

----- Forwarded message -----

From: **Amber Boyle - Harbor Breeze Corp.** <[amber@longbeachcruises.com](mailto:amber@longbeachcruises.com)>

Date: Tue, Jun 11, 2013 at 4:14 PM

Subject: Agenda Item H.1

To: [pfmc.comments@noaa.gov](mailto:pfmc.comments@noaa.gov)

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

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and Council Members,

I am writing on behalf of Harbor Breeze Cruises, a southern California cruise company based out of Long Beach that has been offering seasonal whale watching cruises for nearly twenty years. I am writing today to urge you to take action at the June Pacific Fishery Management Council (PFMC) meeting by providing basic protections for a crucial forage species: Pacific Saury, an important forage fish for migratory species such as sharks, marlin, and tuna. The Council should remove Pacific Saury from its List of Authorized Fisheries and Gear, thereby requiring notification before fishing could begin.

At Harbor Breeze Cruises, our livelihoods depend on a thriving marine ecosystem that supports robust populations of marine mammals, and we are lucky enough to bring the experience of seeing these animals in action to thousands of people every year.

Throughout the year, our guests are treated to sightings of Gray and Blue Whales, Fin Whales, Humpback Whales, Minke Whales and Killer Whales. Other wildlife frequently spotted are a variety of dolphins including Common, Bottlenose, Risso's and Pacific White Sided, as well as sea lions and harbor seals. These charismatic marine mammals are drawn to the California Current along our coast due to the abundant food supply provided by healthy populations of forage fish.

We hope to continue our work for many years to come, which is why we want to thank the Council for unanimously adopting its fishery ecosystem plan, a milestone that begins a new era in fishery management that recognizes how everything is connected in the ocean.

The first priority of the Council's FEP should be to protect forage fish that aren't currently managed- like Pacific saury- because they are linked to so many components of the ocean's food web. For such an ecologically important tier of the food web, the last thing we need is an unregulated high-volume fishery to serve as a new source or chicken feed or bait shipped overseas.

Once a notification requirement has been put in place, the council should move on to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

With recent advances in our knowledge of ocean ecosystems, we know that forage fish are critical to maintaining healthy oceans that in turn drive coastal economies. This awareness has led businesses like HarborBreeze Cruises and others to engage in those management processes that govern what happens in the waters off of our coast.

We appreciate the opportunity to offer our support for this issue, as well as your continued commitment to a productive marine environment, and would be happy to provide additional comments to the Council if needed.

Best regards,

Amber Boyle  
Vice President  
Harbor Breeze Corp.  
Yacht Charters and Cruises  
tel: [\(562\) 983-6880](tel:(562)983-6880)  
fax: [\(562\) 983-6883](tel:(562)983-6883)  
website: [www.longbeachcruises.com](http://www.longbeachcruises.com)



# MARINA DEL REY ANGLERS

4230 Del Rey Ave. # 530, Marina Del Rey, CA 90292

June 12, 2013

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

**RE: Agenda Item H.1.,  
Updating the Federal List of Authorized Fisheries and Gear**

Dear Chairman Wolford,

Marina Del Rey Anglers is a 501(c)(3) nonprofit sport fishing club with over 100 members. We fish and do conservation work in Los Angeles California. Our "mission" is to promote the sport of fishing and to be champions of conservation and good sportsmanship. Examples of how we do this would be our Youth Fishing Program and our Ocean Resources Enhancement Program (aka the Fish Grow Out Pen full of white sea bass). The success of our two grow out pens has brought a sense of "parental pride" to the individuals in our club who volunteer their time. The live release rate averages about 85% and the grow-out pens in Marina Del Rey Harbor has surpassed 80,000 fish.

We are writing to thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean. We encourage you to take judicious steps to protect feed fish that support the sport fish populations. Pacific saury are an important food source for many migratory species, including albacore tuna and marlin - that our members are particularly fond of.

Please do not undermine this important protection by pre-authorizing a fishery to target Pacific saury. Leaving Pacific saury on an updated list of pre-approved fisheries would be especially dangerous to sport fishing species by depletion of their food. In light of the council's unanimous adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish these forage fish need your protection.

If Pacific saury remains on a pre-approved list for commercial take there is nothing to prevent new harvesting of this important forage fish. We encourage the council to include these fish in your current list of fisheries so that you can ask the important questions before a new fishery begins.

Once you've put in place a notification requirement, the council should move on to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

Thank you for considering our comments and for your continued commitment to maintaining healthy populations of the all the fish that need to be in the sea. Our over 100 members are part of the users that love to catch them. Sportfishing is an important part of the financial benefit of a healthy fishery.

Sincerely,  
Marina Del Rey Anglers

***Keith Lambert***

2013 MDRA President  
[www.MDRAnglers.com](http://www.MDRAnglers.com)



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

**RE: Pacific Fishery Ecosystem Plan and Update Authorized Fisheries and Gear**  
**Agenda item: H.1.c - Public Comment on List of Fisheries Update**

June 12, 2013

Dear Chairman Welford and Council Members,

On behalf of our over 15,000 Audubon members throughout Oregon, we thank the Pacific Fisheries Management Council (PFMC) for your unanimous decision in April to adopt this Council's first Fishery Ecosystem Management plan (FEP). While lacking regulatory authority, the FEP is a potentially powerful mechanism by which the Council may target harvest limits to avoid impacting the food chain.

The FEP prioritizes protecting unmanaged forage fish, which are at the heart of the Larger California Current Ecosystem's oceanic food web. The FEP implicitly acknowledges the importance of monitoring conditions, populations and ecological processes to help inform PFMC fishery policy from near shore estuaries to the depths of the continental shelf. The newly adopted biannual State of the Larger California Current Ecosystem Report is a great example of the powerful ecosystem management tools now available to inform and empower the Council to tailor fisheries' decisions to protect species and the health of the Larger Californian Current Ecosystem.

We ask the Council at its June 24<sup>th</sup> meeting in Garden Grove, CA to update the List of Authorized Fisheries and Gear by removing a non-existent commercial seine fishery for Pacific saury. Pacific saury is a small to medium pelagic schooling fish that migrates seasonally between subtropical and subarctic areas in the Pacific Ocean. Currently this loophole would allow a new purse seine fishery for Pacific saury to begin at any time, without notification to the PFMC and without any catch limits or fishery specific regulations. Failing to close this loophole is inconsistent with and undercuts the Council's recently adopted FEP, which emphasizes a precautionary approach towards forage fish. Removing Pacific saury from the List of Authorized Fisheries and Gear will allow fishery managers the opportunity to ask important questions before a fishery is launched, rather than after. Removing this fishery from the List of Authorized Fisheries and gear won't prohibit future fisheries to develop. Rather, it will only require fishery developers to notify the Council before fisheries begin.

We commend to the Council the following:

**Upper Trophic Predators Depend upon Forage Fish**

We cannot emphasize enough the need to err on the side of conservation where there is insufficient or no information on habitat requirements or life history patterns of these forage fish

which play a critical role in the California Current food web. Prized predators such as salmon and tuna make their living foraging on these little fish, as do whales and other marine mammals.

### **Seabirds are Indicators of Ecosystems and Forage Fish Status**

Seabirds are proven indicators of ecosystems<sup>1</sup> and the status of forage fish<sup>2</sup>. Because fisheries landings and net surveys for forage fish have limitations – the former is biased toward adults, the latter may miss patchily distributed species – samplings of the stomach contents of fish eating seabirds can inform estimates of size and age classes of forage fish stocks including small pelagic and juvenile predatory fishes around the North Pacific Rim<sup>3</sup>.

A recent meta-analysis across seven ocean ecosystems confirmed seabird breeding success is strongly linked to food abundance, provided by healthy stocks of forage fish. When fisheries removed more than 2/3 of the maximum prey biomass observed in long-term studies of forage fish, seabird colonies' productivity faltered and even failed due to reduced forage fish abundance - key food for growing chicks<sup>4</sup>.

### **Sooty Shearwaters are 'Mega-Migrators' for Forage Fish.**

Oceanic seabirds like albatross and shearwaters are marine predators that spend up to 90% of their lives at sea in search of food. Sooty Shearwaters range widely and concentrate around upwelling shallows, converging currents, embayments and at large river plumes. Shearwaters forage on soft-bodied forage fish, squid and euphausiids and are a dominant avian predator in the pelagic marine ecosystem<sup>5</sup>. Sooty shearwaters are the most abundant seabird in the California Current Ecosystem during the boreal spring and summer. Identified regional habitat 'hot spots' within the California Current Ecosystem for Sooty Shearwater include: the Columbia River Plume, Cape Blanco, Monterrey Bay, Estero/San Luis Obispo Bays and the eastern Santa Barbara Channel through the inner Southern California Bight<sup>6</sup>. Estimates of global Sooty Shearwater population range between 20 and 40 million<sup>7</sup>, yet recent large declines have prompted the ICUN to list the species as "Near Threatened"<sup>8</sup>

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<sup>1</sup> Piatt, J.F. et al., (2007). Introduction: a modern role for seabirds as indicators. Marine Ecology Progress Series 352, 199–204.

<sup>2</sup> Diets of top predators indicate pelagic juvenile rockfish (*Sebastes* spp.) abundance in the California Current System. Fish. Oceanogr. 16: 273–283.

<sup>3</sup> Thayer, J.A. et al. (2008) Forage fish of the Pacific Rim as Revealed by diet of a Piscivorous seabird: Synchrony and Relationships with Sea Surface Temperature. Canadian Journal of Fisheries and Aquatic Sciences, 65(8): 1610-1622.

<sup>4</sup> Cury P.M. et al. (2011) Global Seabird Response to Forage Fish Depletion—One-Third for the Birds. Science Vol. 334 no. 6063 pp. 1703-1706.

<sup>5</sup> Shiomi, K. and Ogi, H. (1992) Feeding Ecology and Body Size Dependence on Diet of the Sooty Shearwater, *Puffinus Griseus* in the North Pacific. NIPR Symp. Polar Biol., 5, 105-113.

<sup>6</sup> Adams, J. et al. (2011) Summer-time use of west coast US National Marine Sanctuaries by migrating sooty shearwaters (*Puffinus griseus*) Biological Conservation 156 (2012) 105–116.

<sup>7</sup> Shiomi K. and Ogi H. Feeding Ecology and Body Size Dependence on Diet of the Sooty Shearwater, *Puffinus Griseus* in the North Pacific. NIPR Symp. Polar Biol., 5, 105-113.

<sup>8</sup> BirdLife International, 2010. *Puffinus griseus*. In: IUCN 2011. IUCN Red List of Threatened Species. Version 2011.2.

Sooty shearwaters are known for their spectacular annual migrations, documented in 2006 when birds from breeding colonies in New Zealand were tracked with geolocating tags. In a single year, these Sooty Shearwaters traced a giant serpentine path over the entire Pacific, migrating nearly 40,000 miles round trip<sup>9</sup>. Only one animal, the Arctic Tern, annually migrates further.

Why do Sooty Shearwaters fly from one end to the other of the entire Pacific Ocean in one year? The answer is clear, to feast on schooling forage fish found at the most productive ends of the globe.

### **Pacific Saury is an Important Prey Species for Seabirds**

In one diet study across four current systems, immature Sardine and Pacific saury were the most important prey in Sooty shearwater's diet, along with other unidentified forage fish species and, to a lesser extent, squid, pelagic barnacle, and jellyfish<sup>10</sup>. In the late 1990's a study in the North Pacific found Pacific saury to be the primary fish taken by Sooty Shearwaters<sup>11</sup>. Stomach content surveys in June 1984 in the subtropical western Pacific revealed that Sooty Shearwaters' diets were dominated by Pacific Saury (78 %), followed by barnacles and jellyfish<sup>12</sup>. Elsewhere, researchers documented prolonged foraging stops in the north Pacific by Sooty Shearwaters in three areas where schooling forage fish congregate, including Pacific saury, Pacific cod, and Anchovy<sup>13</sup>.

Rhinoceros Auklets also depend upon Pacific saury. Pacific saury, Sand lance and Bluethroat argentinus were the most important prey in the Rhinoceros Auklet diet in samplings during 1976-2003 at Triangle Island, the outermost of the Scott Islands, in the Eastern Coastal Transition Zone. In another study, the stomach contents of Rhinoceros Auklet were sampled in six study sites, in three coastal current systems and in one transition zone. Forage fish communities identified and collected included: Anchovy, Sand lance, Capelin, juvenile Rockfish, and Pacific saury<sup>14, 15</sup>. In the Southeast Farallon and the Año Nuevo Islands in the California Current, Rhinoceros Auklet populations likewise depend on Pacific Saury, Sardines and Anchovy for a significant portion of their diet<sup>16</sup>.

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<sup>9</sup> Shaffer SA, et al. (2006) Migratory Shearwaters Integrate Oceanic Resources across the Pacific Ocean in an endless summer. *Proc Natl Acad Sci USA* 103:12799–12802.

<sup>10</sup> Shiomi K. and Ogi H. Feeding Ecology and Body Size Dependence on Diet of the Sooty Shearwater, *Puffinus Griseus* in the North Pacific. *NIPR Symp. Polar Biol.*, 5, 105-113.

<sup>11</sup> Gould P. et al. (2000) Foods, Trophic Relationships, and Migration of Sooty and Short-Tailed Shearwaters Associated with Squid and Large-Mesh Driftnet Fisheries in the North Pacific Ocean. *Waterbirds* 23(2): 165-186.

<sup>12</sup> Minami H. and Ogi H. (1997) Determination of migratory dynamics of the Sooty shearwater in the Pacific using stable carbon and nitrogen isotope analysis. *Vol. 158*: 249-256.

<sup>13</sup> Shaffer SA, et al. (2006) Migratory Shearwaters Integrate Oceanic Resources across the Pacific Ocean in an endless summer. *Proc Natl Acad Sci USA* 103:12799–12802.

<sup>14</sup> Thayer, J.A. et al. (2008) Forage fish of the Pacific Rim as Revealed by diet of a Piscivorous seabird: Synchrony and Relationships with Sea Surface Temperature. *Canadian Journal of Fisheries and Aquatic Sciences*, 65(8): 1610-1622.

<sup>15</sup> Vermeer, K. (1979) Nesting requirements, food and breeding distribution of Rhinoceros auklets, *Cerorhinca monocerata*, and Tufted puffins, *Lunda cirrhata*. *Ardea* 67:22-27.

<sup>16</sup> Thayer, J.A. et al. (2008) Forage fish of the Pacific Rim as Revealed by Diet of a Piscivorous Seabird: Synchrony and Relationships with Sea Surface Temperature. *Canadian Journal of Fisheries and Aquatic Sciences*, 65(8): 1610-1622.

### **In Closing**

The FEP holds tremendous promise as a guidance framework and source of content for Council activities to protect the marine ecosystem, including birds and other marine predators. We look forward to strong Council action to robustly implement the FEP and urge you to review and identify the Fishery Management Plans that should be amended in order to be consistent with this new direction in management as opposed to a crisis-based management approach.

Specifically, we urge the Council to move quickly to update the List of Authorized Fisheries and Gear by removing Pacific Saury from that list.

Finally, we urge the Council to incorporate the following in all management decisions: upper level trophic predators such as predatory fish and marine mammals depend upon healthy forage fish stocks; seabirds are excellent indicators of ecosystems and forage fish status; many seabirds, such as Sooty Shearwaters and Rhinoceros Auklets, depend specifically upon Pacific saury during their life histories for their survival.

We thank you and encourage you to continue in this new ecosystem management direction that will help maintain a productive California Current Ecosystem, even as you manage fisheries into the future.

Sincerely,

Audubon Society of Portland  
Audubon Society of Corvallis  
Kalmiopsis Audubon Society  
East Cascades Audubon Society  
Salem Audubon Society  
Umpqua Valley Audubon Society  
Rogue Valley Audubon Society  
Lane County Audubon Society

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William Hering, President  
Debbie Schlenoff, Conservation Chair



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

**Re: Agenda Item H.1.c. Public Comment on Updated List of Fisheries**

Chairman Wolford and Council members:

Bamboo Sushi is the first certified, sustainable sushi restaurant in the world. Based in Portland, Oregon, we are dedicated to delivering the freshest fish, meats, and produce to our costumers with the greatest consciousness to marine stewardship, sustainability, and the environment.

Increased demand for popular seafood is depleting fish stocks around the world and harming the health of our oceans. With nearly 76% of the world's fish populations over-fished or fully fished out, scientists are concerned that the oceans simply cannot keep up with the growing demand. With most of the seafood in the United States being consumed in restaurants, we believe it is imperative to create a restaurant where people can get the freshest and best fish possible, while simultaneously helping to save the oceans and marine life.

We write today to thank the Council for adopting the final Pacific Coast Fishery Ecosystem Plan and maintaining the first ecosystem priority as prohibiting new fisheries on currently unmanaged forage fish. We ask the Council to start protecting unmanaged forage species now by updating the List of Fisheries and removing the purse seine fishery for Pacific saury, an important food source for many fish we use, especially albacore tuna. The schooling characteristic of Pacific saury that makes them so attractive to predators also renders them susceptible to industrial fisheries. Unregulated harvest of Pacific saury may lead to depletion of the species and cause negative impacts on pedators that we all love to eat.

Forage fish in the California Current are hugely important in terms of predator production as compared to any other ecosystem in the world. On the Pacific coast, forage contributes to about 52 tons per square kilometer annually to the production of

---

their predators. Therefore, there is huge commercial value to leaving forage in the water as food for bigger, more lucrative fish, like our Oregon albacore tuna. This fact was ~~confirmed by~~ the findings of the Lenfest Forage Fish Task Force report which found that forage are worth more than double in the water as supportive value to other fisheries than as direct catch. With the growing worldwide demand to use forage fish for high-volume purposes, it is imperative that we act proactively to conserve the food base of marine ecosystem.

Thank you for your attention to these important issues. We look forward to engaging throughout this process.

Sincerely,

Kristofor Lofgren  
Owner, Bamboo Sushi

A handwritten signature in black ink, appearing to read 'Jin Soo Yang', with a stylized, flowing script.

Jin Soo Yang  
Executive Chef, Bamboo Sushi





June 12, 2013

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

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and 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 strongly encourage you to remove Pacific saury from the pre-authorized fishery list.**

Thank you for taking action in April to unanimously adopt the Pacific Fishery Ecosystem Plan (FEP). As the first of its kind, the adoption of this meaningful plan symbolizes a milestone that ushers in a new era in fishery management that recognizes the interconnectedness of all things in the Pacific marine environment.

It is imperative that the plan's first priority be to protect forage fish species that are not currently managed, like Pacific saury, because they are linked to so many strands of the ocean food web. Pacific saury is an important forage fish for migratory species such as sharks, marlin, and albacore tuna. Therefore, it is necessary for the Council to remove Pacific saury from its list of pre-approved fisheries as it updates the Federal List of Authorized Fisheries and Gear.

Forage fish sustain marine mammals, seabirds, and larger predator fish. However, due to market pressure and a rising demand for marine protein to feed a growing world, unregulated high-volume fisheries are serving as the new source of chicken feed and bait shipped overseas, resulting in a detrimental impact on predator fish who rely on forage fish for sustenance. For such an ecologically important tier of the ocean food web, a continued effort for sustainable management is essential.

It should be noted that updating the Federal List of Authorized Fisheries and Gear alone, is not enough to ensure the health and productivity on a marine environment that relies on forage fish. Once a notification requirement is implemented, the Council should proceed to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

Environmental Action Committee of West Marin  
PO Box 609 Point Reyes, California 94956  
[www.eacmarin.org](http://www.eacmarin.org) 415.663.9312

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, appearing to read "Amy Trainer", with a long horizontal flourish extending to the right.

Amy Trainer, Executive Director



2310 SE Hawthorne Blvd  
Portland, OR 97214  
(503) 260-6552  
oregonfreshfish@gmail.com

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

June 10, 2013

**Re: Agenda Item H.1.c – Public Comment on List of Fisheries**

Dear Pacific Fishery Management Council Chair and Members:

I am writing today to thank the Council for adopting the final Fishery Ecosystem Plan at the meeting in Portland and encourage you to immediately proceed with the first ecosystem-based initiative - providing additional protections for unmanaged forage species. I was honored to represent my family business by testifying at the Portland meeting and have enjoyed participating in the Council process. However, I urge you not to undermine the ecosystem plan by allowing a purse seine fishery on Pacific saury, an important food source for a whole host of marine life, including commercially valuable species, such as albacore tuna.

Flying Fish Oregon is a local, family run business and we are proud to sell all sustainable seafood, including Oregon albacore tuna. As a consumer, you have seafood choices. Not all fish and shellfish available in today's markets and restaurants are good choices from an environmental perspective. Populations of seafood vary over time, both naturally and depending on how heavily they are fished. Some are in good shape due in part to good fisheries management, and those are excellent seafood choices. However, to maintain economically valuable fish populations, there must be a healthy base of forage species.

The schooling characteristic of Pacific saury that makes them attractive to predators also renders them susceptible to industrial fisheries. Unregulated harvest of Pacific saury may lead to depletion of the species and cause negative impacts on predators that we like to buy, sell and eat. Therefore, I urge the Council to remove Pacific saury from the List of Fisheries and include saury in the Fishery Management Plan amendment process for unfished forage fish species.

As a small business owner that believes in serving only the highest quality, sustainable seafood, I appreciate your efforts to maintain healthy and sustainable fisheries. Thank you for allowing me the opportunity to comment.

Lyf Gildersleeve  
Owner, Flying Fish Co.



# International Game Fish Association

## Fishing Hall of Fame & Museum

300 Gulf Stream Way, Dania Beach, Florida, 33004 U.S.A.

Phone: 954-927-2628 • Fax: 954-924-4299 • Museum Fax: 954-924-4220

June 11, 2013

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*At Large*

Pacific Fishery Management Council

Dan Wolford, Chairman

7700 N.E. Ambassador Place, Suite 101

Portland, Oregon 97220-1384

Dear Chairman Wolford and Council Members,

On behalf of the International Game Fish Association (IGFA) and our 12,000 members in 135 countries, I am writing in support of the Pacific Fishery Management Council's efforts to update its List of Authorized Fisheries and Gear (List of Fisheries). Specifically, we request that the commercial purse seine fishery for Pacific saury be removed from the List.

### Board of Trustees

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Ralph "Agie" Vicente

Joan Salvato Wulff

The IGFA is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping. Our members are dedicated anglers who have fished in waters around the globe, and we know that the future of the sport depends on responsible practices today.

We applaud the Pacific Fishery Management Council's efforts to develop a fishery ecosystem plan and to protect unmanaged forage fish. Updating the List complements these efforts by requiring notification of new fishery proposals. By removing Pacific saury from the List, the Council ensures that it will have at least a 90-day window to review any proposal to develop a fishery on Pacific saury before it may proceed. Currently, there is no such requirement.

In order to maintain robust populations of the fish we enjoy catching off the Pacific coast, measures must be taken to ensure that there is enough prey in the water to sustain and grow these fisheries. Pacific saury are particularly critical to highly migratory fish like tuna, marlin, and swordfish. Also, Pacific saury are a schooling species that are easily caught, so their abundance is highly variable and their populations are especially vulnerable to collapse. These fish are simply too important to the fragile, California Current ecosystem to leave unprotected.

Thank you for your attention to this very important issue. The IGFA appreciates the opportunity to offer support for the responsible management of forage fish off the Pacific coast and would be happy to provide additional comments to the Council.

### Past Chairmen

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Elwood K. Harry

Michael Lerner

Michael J. Levitt

George G. Matthews

### Trustee Emeritus

Pamela S. Basco

Jose Luis Beistegui

Maurus F. Claverie Jr.

Peter S. Fithian

Floyd D. Gottwald, Jr.

Ruben Jaén C.

John L. Morris

Sincerely,

Jason Schratwieser

IGFA Conservation Director

*The International Game Fish Association is a not-for-profit organization committed to the conservation of game fish and the promotion of responsible, ethical angling practices through science, education, rule making and record keeping.*

Page 29 of 108  
Email: [hq@igfa.org](mailto:hq@igfa.org) • Website: [www.igfa.org](http://www.igfa.org)



## **Native Fish Society**

Conserving biological diversity of native fish and protecting wild populations

221 Molalla Ave., Suite 100  
Oregon City, OR 97045  
503-496-0807  
[mike@nativefishsociety.org](mailto:mike@nativefishsociety.org)

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

RE: Agenda Item H.1.c. Public Comment on Updated List of Authorized Fisheries

Dear Mr. Wolford:

The Native Fish Society (NFS) is a regional conservation organization concerned about the health, abundance and biological diversity of native fish ecosystems. We strongly promote the integration of science, public policy and management to get the most beneficial results for wild fish.

NFS recommends that the PFMC not allow a pre-authorized purse seine fishery on Pacific saury and use the precautionary principle in allocating quotas for other unmanaged forage fish. Forage fish are native wild populations of animals that require thoughtful management based on scientific information, monitoring and evaluation. The expansion of fishery quotas for so-called forage fish has an impact upon the entire ocean ecosystem and can impact freshwater aquatic and terrestrial environments affecting mammals, birds and other species of fish that rely upon those fish for food, growth, reproductive success and survival. For example, wild native salmonids, many of which are now listed as federal protected species, are dependent upon a healthy and productive ecosystem that is food rich and abundant.

Pacific saury is especially important for albacore tuna and other highly migratory, commercially valuable fish. We must be proactive in securing the natural food source for

our native species and ensure that future generations can experience abundant stocks of salmon, tuna and rockfish. As fishermen, we are acutely aware of the impact human activities can have on the ecosystem. Allowing a pre-approved purse seine fishery on vulnerable schooling species such as Pacific saury could have disastrous consequences for the ecosystem and the marine food web on which our native populations of fish depend. Please remove saury from the List of Fisheries and ensure they are included in the process implementing Fishery Management Level protections for unfished forage fish species.

Thank you for considering our comments. NFS looks forward to following your progress on this important issue.

Sincerely,

Mike Moody  
Executive Director  
Native Fish Society





4189 SE Division St.  
Portland, OR 97202

June 11, 2013

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

**RE: Agenda Item H.1 – Ecosystem Based Management: Update List of Fisheries**

Dear Mr. Wolford,

The Pew Charitable Trusts has collected 2,800 comments from residents of California, Oregon, Washington and Idaho encouraging the council to prevent unregulated fishing on Pacific saury, an important forage species that's not currently managed by the council. Please include the enclosed petition in the supplemental briefing book web site.

The petition itself is included with all the names and cities of individual signers that were gathered as of June 4. The council may continue to receive additional comments in the days ahead. Please note that many of the individual petitions included here have been personalized or include additional comments.

Thank you,

Erik Robinson  
The Pew Charitable Trusts

June 11, 2013

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

Subject: Protect Pacific saury, critical food for ocean wildlife

Dear Chairman Wolford and Council Members,

I am writing to thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean. Now I encourage you to take the next step and remove Pacific saury as a pre-authorized fishery. Saury is an important forage fish for many highly migratory species of sharks and tuna.

Leaving saury on an updated list of pre-approved fisheries would be especially disheartening in light of the council's unanimous adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. An abundance of forage fish helps to maintain the marine environment we all care about. It makes good sense that the ecosystem plan's first order of business is to protect currently unmanaged forage fish species - like saury - because they are linked to so many strands of the ocean's food web.

If saury remains on a pre-approved list there is nothing to prevent new fisheries that target this important prey fish with no restrictions and no consideration about the effect on predators. In fact, a new fishery can begin without so much as a heads-up to the council. I encourage the council to revise its current list of fisheries so that it has a chance to ask important questions before a new fishery begins.

Once you've put in place a notification requirement, the council should move on to establish long-term protection by bringing currently unmanaged forage fish into appropriate fishery management plans beginning in September. Taking this next step will enable the council to prevent unregulated fishing on important prey such as Pacific saury.

Thank you for considering my comments and for your continued commitment to a productive marine environment.

**The Signatories to this Petition Follow this page (on website only). After the signatories, there are additional written public comments from individuals and organizations.**

Steven Adcock	PORTLAND	OR	
Jane Affonso		CA	
Cat Allen	Los Olivos	CA	
Martiin Ansell		CA	
Charles Arnold	Lompoc	CA	
David Arnson		CA	<i>This is important to me!</i>
June Abner		CA	
Alexis Abrams	Los Angeles	CA	
Roberto Aburto	El Cajon	CA	
Mike Acker		WA	
Sara Ackerman	Oakland	CA	
Catherine Adams	Seattle	WA	
Geraldine Adams	Gig Harbor	WA	
Harriet Adams	Eugene	OR	
Winnie Adams	Bellingham	WA	
Victor Afanasiev		CA	
Di Agee	Shelton	WA	
Christie Agovino		CA	
Edwin Aiken	Sunnyvale	CA	
Vinaya Alahan	Guerneville	CA	
Gary Albright	Snohomish	WA	
Gary Alderette		CA	
Debi Aldrich	Covington	WA	
Charles Alexander		CA	
Natalie Alexander	Irvine	CA	
Patricia Alexander		CA	
Joan Alioto	Davis	CA	
Cathy Allen	Vancouver	WA	
Harriet Allen		WA	
Susan Allen	Livermore	CA	
Julie Alley	Long Beach	CA	
Donna Alleyne-Chin		CA	
Bobbi Allison	Bay Point	CA	
Allison Garton	Escondido	CA	
Toby Allphin	Ellensburg	WA	
Luanne Alomair		OR	
Hector R. Amaro	Salem	OR	
Nicole Amato		CA	
Darryn Ambrose	Portand	OR	
Nancy Amodeo	Los Angeles	CA	
Carol Ampel		OR	
Sarbi Anand		CA	
Kristine Andarmani		CA	
Jon Anderholm		CA	
Peggy Andersen	Livermore	CA	
Audrey Anderson	Los Altos	CA	
Becky Anderson	Bellingham	WA	
Clifford Anderson	Sacramento	CA	
Dave Anderson	Berkeley	CA	

Glen Anderson	Lacey	WA	<i>NOW PLEASE TAKE THE NEXT STEP to act upon the reality that EVERYTHING IN THE OCEAN IS INTERCONNECTED.</i>
Judith S Anderson	Long Beach	CA	
Kaylee Anderson		OR	
Patricia Anderson	Roseville	CA	
Roger Anderson	Pleasanton	CA	
Sue Anderson	Aloha	OR	
Joan Andersson		CA	
Frank G. Andrews	San Rafael	CA	
M Andrus		CA	
Robert Anger		CA	
Georgia Antonopoulos		CA	
Craig Antrim	San Pedro	CA	
Susan Apgar	Tujunga	CA	
Susaan Aram	Laguna Beach	CA	
Anthony Arcure	Fresno	CA	
Barbara Arlen	Corvallis	OR	
Brian Armer	Bakersfield	CA	
Tami Armitage	Beverly Hills	CA	
Anthony Arn	West Hollywood	CA	
Julie Arnold		CA	
Maris Arnold		CA	
David Arntson	Bothell	WA	
Siria Arteaga	Modesto	CA	
Connie Arveson	Lake Tapps	WA	
John Ashley		CA	
Susanna Askins	Portland	OR	
Tom Atha	Alhambra	CA	
Debra Atlas	Redding	CA	
Wendy Atmore	Shoreline	WA	
Suzanne Attig	West Hills	CA	
April Atwood	Seattle	WA	
Bob Atwood	Redding	CA	
Candi Ausman	Fremont	CA	
John D. Austin	Olympia	WA	
Luz Ava	Los Angeles	CA	
Linda Avinger	Bellingham	WA	
Steve Aydelott		OR	
Teiko Ayers	Kensington	CA	
Jeanne Blum		CA	
Laura Brink	San Diego	CA	
Jim Brown	Los Angeles	CA	
Darcie Babcock		OR	
Christina Babst		CA	
Lois Bacon		CA	
Cathy Bacquet	Encinitas	CA	
Sacha Badame-Oldani	Oakland	CA	
Rosa Baeza	Reseda	CA	
Mir Bahmanyar		CA	
Angie Bahr		CA	

David Bailey	Alhambra	CA
Michael Bailey	Mission Viejo	CA
Donetta Bair		CA
Kelsey Baker	Novato	CA
Barbara Baldock	Monterey	CA
B Baldwin	Long Beach	CA
Kim Baldwin		CA
Michael Baldwin	Irvine	CA
Tanya Baldwin	Los Gatos	CA
Alex Ballar	Reseda	CA
Katherin Balles	Bremerton	WA
Ranko Balog		CA
Brian Baltin	Seattle	WA
Robert Banever	Duarte	CA
Lynne Bannerman		WA
Stan Banos		CA
Clayton Barbeau, M.A., MFT	San Jose	CA
Diana Barbee		CA
Clara Barber		CA
Nick Barcott		WA
Margery Barlow	Packwood	WA
Scott Barlow		CA
Pamela Barnes	Los Altos	CA
Candice Barnett	Santa Monica	CA
Allison Barr	Everett	WA
Ellen Barron	Santa cruz	CA
Tom Barron	Beaverton	OR
Michael Barrows	Edmonds	WA
Kalanit Barson		WA
William Barthen	Burbank	CA
Joan Basore	San Anselmo	CA
Abigail Bates	Los Angeles	CA
Gail Bates		CA
Candace Batten		CA
Terri Bauer	Long Beach	CA
James Baylie	Long Beach	CA
N. Bazan	Oakland	CA
Denise Beard	Seattle	WA
Jane Beattie		ID
Albert Bechtel	Seattle	WA
Paul Bechtel	Redlands	CA
Susan Bechtholt	Port Orchard	WA
Jeff Beck	Los Angeles	CA
Jeri Beck		CA
Anna Becker		OR
Carol Becker	Sherman Oaks	CA
Christine Becker		CA
Mark Beckwith	Berkeley	CA
Peter Bedard	Los Angeles	CA

Gail Bedinger		CA
Adam Beebe	San Francisco	CA
Marilyn Beidler	San Diego	CA
Lynda Beigel	Bolinas	CA
Laura Bell-Gia	Torrance	CA
Bree Belyea	Goleta	CA
Earlene Benefield	Kirkland	WA
Mercedes Benet	Carlsbad	CA
Bonnie Bennett		OR
Gary Bennett	Bellingham	WA
Richard Benson	Lawndale	CA
Karen Berger	Montrose	CA
Darcy Bergh		CA
Debi Bergsma	Fontana	CA
Helene Bernbaum	Los Angeles	CA
Benjamin Bernhardt		CA
Tonnja Berry	Burbank	CA
George Berticevich Bel	Tiburon	CA
Maureen Besancon		CA
Dirk Beving	Los Angeles	CA
Blaze Bhence	Cypress	CA
Elaine Bierman		CA
Rachael Bigham	Seattle	WA
Nicole D Bilotti		CA
Dianr Binder	Moreno Valley	CA
Reverend Stephanie Bisceglia		CA
Jill Bittner		CA
Dwain Bivens	Glendale	CA
Judith Blackbird		ID
David Blair		WA
William Blair		ID
Jill Blaisdell		CA
Anna Blake		WA
Terri Blakley		CA
Russell Blalack	Cupertino	CA
Denishia Blanco	Imperial	CA
Carol Blaney	Redlands	CA
Rollin Blanton	Los Angeles	CA
Dana Bleckinger	Yachats	OR
Laura Blumberg		CA
Janet Blumer		WA
Sondra Boes	Campbell	CA
Ronald Bogin	El Cerrito	CA
Stephen Bohac	Twain Harte	CA
Susan Bohannan	Santa Ana	CA
Holly Bohin	Menlo Park	CA
Donna Boland		CA
Deniz Bolbol	Belmont	CA
Diane Bolman	Novato	CA



Jose Ricardo Bondoc	San Francisco	CA
Ricco Bonelli	Redondo Beach	CA
Andrea Bonnett	Altadena	CA
Patty Bonney	Portland	OR
Joseph Boone		CA
Carolyn Boor		CA
Cleo Borac		CA
Joan Borame	El Cerrito	CA
Pamela Borne		CA
Vic Bostock		CA
Renee Boteilho	Los Angeles	CA
David Bott	Sacramento	CA
Cyril Bouteille	Mountain View	CA
Sarah Bouwsma	Portland	OR
Pat Bowen	san diego	CA
Jc Bower	Sumner	WA
Candy Bowman	Sacramento	CA
Nancy Boyce		CA
Lewis Boyd	Everett	WA
Jon Boyden		CA
Lea Boyle		CA
Shary Bozied		WA
Chrys Braaten		WA
Kyle Bracken	Los Angeles	CA
Jen Bradford	Spring Valley	CA
Irene Bradle	Marina	CA
Lael Bradshaw	Camano Island	WA
Karen Brandenburger	Tigard	OR
Victoria Brandon	Northridge	CA
Shanna Brandow		CA
Susan Branigan	Cypress	CA
Eric Bratcher	Hayward	CA
Tobi Braverman	Olympia	WA
Joseph Breazeale	Concord	CA
Bonnie Breckenridge	San Diego	CA
Joan Breiding	San Francisco	CA
Rene Breier	Portland	OR
Teri Breitenbach	Carnation	WA
John Bremer	Bellingham	WA
Lisa Breslauer	San Jose	CA
Rosalind Bresnahan	San Bernardino	CA
Shari Brewer	Darrington	WA
Becky Bristow	Tujunga	CA
Bill Britton	Livermore	CA
Jerry Broadbent	Bucoda	WA
Jason Brock		CA
Peter Brockett		ID
Linda Brosh	Novato	CA
Ct Bross		CA

Remijio Broviak		CA	
Damon Brown		CA	
Elaine Brown	Sunland	CA	<i>I am writing to you as a 76-year-old with a BS in Zoology and graduate work at the University of Arizona who has spent her life with concern for animal life domestic and wild. I gratefully thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean.</i>
Gregory Brown	San Francisco	CA	
Lindsey Brown	Everett	WA	
Patricia Brown		CA	
Robert Brown	Fircrest	WA	
Vera Brown		CA	
Jeanne Brown	San Diego	CA	
Cassandra Browning		OR	
Christopher Brunje	Creswell	OR	
Juliette Brush-Hoover	Seattle	WA	
Shari Bruun	Camas	WA	
Tony Buch		WA	
Margaret Buck		CA	
Neysa Budzinski	Alameda	CA	
Carolyn Buhl		OR	
Joseph Buhowsky		CA	
Dick Bullock	Priest River	ID	
Ruth Bullock		ID	
Susan Bullock	Reseda	CA	
Terri Bumgardner	Vista	CA	
Peter Burchard		CA	
Lys Burden	Port Townsend	WA	
Claudio Burdisso	Everson	WA	
Sharon Burge	Salem	OR	
Robert Burk	Los Angeles	CA	
Bonnie Margay	Burke	CA	
Richard Burke	Palm Springs	CA	
Paul Burks	San Rafael	CA	
Tim Burns	Federal Way	WA	
Joan Bush	Spring Valley	CA	
Michael Bush	Encinitas	CA	
Maria Bustamante	Albany	CA	
Ray Bustos	Fullerton	CA	
Janice Butcher	Marysville	CA	
Nathan Butler		CA	
Lisa Butterfield	Eureka	CA	
Andrea Byers	Oakland	CA	
Nancy Byers	Berkeley	CA	
Aloah Byrum	Whittier	CA	
Stacie Charlebois		CA	
Kurt Cruger		CA	
Ben Cachola	Union City	CA	
Amanda Caffall		OR	
Barbara Cain		CA	
Tamara Cain	Sacramento	CA	

Antoinette Calavas	Mendocino	CA	
Andrew Calderella	Valencia	CA	
Patricia Callahan	San Francisco	CA	
Rev Callahan		WA	
Ronald Calvisi	Toluca Lake	CA	
Rose Camarillo	Bolinas	CA	
Jennifer Cambra		CA	
Cami Cameron	Vancouver	WA	
Ruth Cameron	Agoura Hills	CA	
Valerie Cameron	Woodland Hills	CA	
David Camp	Burbank	CA	
Amanda Campbell	Meridian	ID	
Dionna Campbell		CA	
Dudley & Candace Campbell	Valley Glen	CA	
Joyce Campbell		CA	
Karen Campbell	Citrus Heights	CA	
Diane Cantwell	Los Angeles	CA	
Marina Cappas		ID	
Mark Cappetta	Rancho Mirage	CA	
Junko Card	Exeter	CA	
Geraldine Card-Derr	Exeter	CA	
Sylvia Cardella	Hydesville	CA	
Michael Cardoza	Los Angeles	CA	
T Carey		OR	
Jered Cargman	Los Angeles	CA	
D Carino		ID	
Ryan Carle Carle		CA	
Brad Carlquist	Seattle	WA	
Eric Carlson	Los Osos	CA	
Gwenna Carlson	Richland	WA	
Patricia Carlson	Los Angeles	CA	
Tasha Carpenter	Deer Island	OR	
Sandra Carr	Mountlake Terrace	WA	
Donna Carr, M.D.	Encinitas	CA	
Martha Carrington	Santa Cruz	CA	
Glen Carroll	Seattle	WA	
Kathryn Carroll		CA	
Reidun Carstens	LA	CA	
Chaka Carter		CA	
Lori Carter		CA	
Marian Carter	West Covina	CA	
Michele Carter	Edmonds	WA	
Pj Carter		OR	<i>I'm hoping you folks understand this situation.</i>
Jennifer Cartwright	Costa Mesa	CA	
David Casey	Seattle	WA	
Jill Cassidy		CA	
Joy Cassidy	Coeur D Alene	ID	<i>OUR ENVIRONMENT IS ONLY HEALTHY WHEN IT IS IN BALANCE, JUST LIKE OUR OWN BODIES!! WHEN ONE COMPONENT IS REDUCED OR REMOVED, THE WHOLE ENTITY SUFFERS!</i>
Pam Cassidy		CA	

Kathleen Casson	Portland	OR	
Jamie Castaneda		CA	
Gail Caswell		CA	
Beth Cataldo	San Francisco	CA	
Katie Cather	Loomis	CA	
Clover Catskill		CA	
S A M Cecile	Everett	WA	
Tristan Celayeta	Mill Valley	CA	
Ronert Cerello	La Mesa	CA	<i>It's called the chain of life for a very good reason, as you know. Nothing could be more vital to maintaining and overseeing the health of the ocean areas under stewardship. These are simple changes—but without them, a plan for reform and bettered management in my opinion will have little odds of doing anything but making the situation worse, and not better.</i>
Kim Chamberlain	Fortuna	CA	
Betty Chan	Seattle	WA	
Danny Chan		CA	
Vickie Chandler	San Jose	CA	
Christina Chang	Huntington Beach	CA	
Heather Chapin	Portland	OR	
Timothy Chapman		CA	
Isabel Charleston		CA	
Felicia Chase		CA	
Janelle Chase	San Francisco	CA	
Morris Chay	Santa Rosa	CA	
Pamela Check	Chico	CA	
Ted Cheeseman	Saratoga	CA	
Allan Chen		CA	
Jo Chen		CA	
Cari Chenkin		CA	
Suzy Chersky	Fountain Valley	CA	
Antonia & Andrew Chianis		CA	
Kyle Chidester	San Francisco	CA	
Eileen Chieco	Ashland	OR	
Connie Rena Childs	University Place	WA	
Jerry Chilson	Enumclaw	WA	<i>It is nice to see common sense alive &amp; well in the world these days. Thank you.</i>
Jason Chin	Portland	OR	
Robert Chirpin	Northridge	CA	
Caroline Choquette	Philomath	OR	
Carolyn Chris	San Francisco	CA	
Lisa Christianson	Everson	WA	
Mary Christlieb		CA	
Gay Chung	San Francisco	CA	
Susan Ciaramella	Sylmar	CA	
Erin Clancy	San Diego	CA	
Anne Clark		CA	
Barri Clark		CA	
Irina Clark		CA	
Marcia Clarke	Bothell	WA	
Kathy Clements	Orange	CA	
Marilyn Closterman	Issaquah	WA	

Heather Clough	Ventura	CA
Scott Coahran	Los Banos	CA
Portland Coates	San Francisco	CA
Angela Cockrum	Monroe	WA
Claire Cohen		OR
Elizabeth Cohen	San Diego	CA
Mitch Cohen		CA
Nancy Cohn		CA
Annapoorne Colangelo	Clinton	WA
Martha Colburn	El Cerrito	CA
Amy Colla		CA
Fran Collier		CA
Amy Collins	Seattle	WA
Gerry Collins	Murrieta	CA
Laura Collins		CA
Lyle Collins		WA
Keith Comess	Bellingham	WA
Sandy Commons	Sacramento	CA
Kathy Compagno		CA
Mike Conlan	Redmond	WA
Patrick Conn	Kent	WA
Cherie Connick	Crescent City	CA
Cecelia Conover	San Diego	CA
Tacey Conover	Redding	CA
Harald Conradi	Los Angeles	CA
Thomas Conroy		CA
Barbara Consbruck	Sylmar	CA
John Contos	n/a	CA
Craig Cook	Santa Rosa	CA
Michael Cook	Redwood Valley	CA
Mitzi Coons	Los Angeles	CA
Margaret Copi	Oakland	CA
Norma Corey	Redwood City	CA
Peter Corkey	San Francisco	CA
Gregory Corning		CA
Christopher Cornish	San Francisco	CA
Pamela Cornish	Silverdale	WA
Pamela Corradini		CA
Jim Corriere	Brawley	CA
Sean Corrigan	Modesto	CA
Sean Corrigan	Trinity Beach	CA
Desiree Cortez		CA
Maria Corvalan		CA
Kathleen Cosgrove	Arroyo Grande	CA
Edward Costello	Santa Monica	CA
Robert Cotner		CA
Anne Cotta	San Anselmo	CA
Anna Cottle		CA
Elizabeth Cotton		CA

Sandi Covell	San Francisco	CA	
Antony Cowan		WA	
Leticia Cowan	San Jose	CA	
Allison Cox		WA	
Robert Cox		WA	
Buzz Coy	Red Bluff	CA	
Edward Craig	Eugene	OR	
Laura Craig	Yelm	WA	
Patrick Craig	Guerneville	CA	
Donna Crane	Anderson	CA	
Lia Craven		WA	
Rebekah Creswell	Portland	OR	
Phillip Cripps	Cathedral City	CA	
Brayden Criswell		OR	
Scott Crockett		OR	
Linda Crook		CA	
Barb Crumpacker	Coeur D Alene	ID	
Diana Cubeta	Laguna Niguel	CA	
Eleanor Cuevas	Sonoma	CA	
Kermit Cuff	Mountain View	CA	
Sherrell Cuneo	Los Angeles	CA	
Alan Cunningham	Carmel Valley	CA	
Debra Cunningham	Encinitas	CA	
Debra Cunningham		CA	
Eithne Cunningham		CA	
Nancy Cushwa		OR	
Pat Cuvillo	Redwood City	CA	
Gloria D'Andrea	Cataldo	ID	
Albert D'Orazio	Rancho Cucamonga	CA	
Oceanah D'Amore	Talent	OR	
Carla Davis		CA	
Erika Davis	Lopez Island	WA	THIS IS REALLY, REALLY IMPORTANT FOR THE HEALTH AND SUSTAINABILITY OF OUR FISHERIES.
Carole Dadurka	San Clemente	CA	
Mr. Shelley Dahlgren, PhD	Issaquah	WA	
Susan Dailey	Pleasanton	CA	
Felicia Dale		WA	
Mitch Dalition	San Francisco	CA	
Judie Dalton	Pleasant Hill	CA	
Rhea Damon		CA	
Mondonna Danesh	Port Orchard	WA	
Barbara Daniels	Los Angeles	CA	
David Daniels-Lee		WA	
Amy Danielson		OR	
Kevin Darcy		WA	
Denise Dardarian	Los Angeles	CA	
Roger Darden	Vancouver	WA	
Ruth Darden		WA	
Wanda Darland		OR	
Elizabeth Darovic	Monterey	CA	



Suzanne Darweesh		CA
Bonnie Daut	Kent	WA
Diane Davenport		CA
Robert Davenport	Lakewood	CA
Dorothy L Davies	San Francisco	CA
Leslie Davies	Oceanside	CA
Margaret Davies	Pullman	WA
Marilee Davies	Portland	OR
Jill Davine		CA
Clark Davis	Los Osos	CA
Edward Davis	Edmonds	WA
Galen Davis	Seattle	WA
Gary Davis	Thousand Oaks	CA
John & Susan	Davis	CA
Kat Davis		CA
Michelle Davis	Vacaville	CA
Robert Davis	San Diego	CA
Sharon Davis	Portland	OR
Tammy Davis	Los Angeles	CA
Chris Dawson	Playa Del Rey	CA
Chris Dawson	Playa Del Rey	CA
Wayne Day	San Francisco	CA
Margaret De Mott		CA
Elisse De Sio	Redwood City	CA
Lawrence Decoster	Seattle	WA
Brandy Delynn	San Diego	CA
Tammy Desanchez	Mission Viejo	CA
Richard Desantis		CA
Brandie Deal	Bothell	WA
Rayline Dean		CA
Diana Dee	North Hollywood	CA
Bev Deering	Seattle	WA
Barbara Delgiudice	Burien	WA
John Delaney	Ventura	CA
Heather Della Ripa	South Lake Tahoe	CA
James Denison	Long Beach	CA
Margaret Denison	Corvallis	OR
Jack & Margarita Denman	Fullerton	CA
Ray & Joyce Denne	Pacific Grove	CA
Lori Dennis	Eugene	OR
Rory Denovan		WA
Michael Denton	San Leandro	CA
Karen Deora	Portland	OR
Glyn Deputy	Ashland	OR
Penny Derleth	Deer Park	WA
Karen Descamps	LOmpoc	CA
Sheila Desmond	Cameron Park	CA
Marguerite Dessornes	Thousand Oaks	CA

*To maintain a healthy ocean, we need to make sure there is enough food in the ocean so the bigger fish, sharks, marine mammals and seabirds can eat too. Please protect the little fish from over fishing.*

Scott Devries	San Pedro	CA
R Di Giovanni-Norton	Kuna	ID
Francisco Diaz	Richmond	CA
Donna Diduch		WA
Cathe Dietrich		CA
Richard Dimatteo	San Diego	CA
Catherine Dishion	Corbett	OR
Chaitanya Diwadkar	Hayward	CA
Katherine Doberne	Winnetka	CA
Linda Doebl	Marina Del Rey	CA
Cody Dolnick		CA
Del E. Domke	Bellevue	WA
Rowena Donelson	Ferndale	WA
Geraldine Donigan	San Diego	CA
Valeska Donoso		CA
Meghan Dooney	Portland	OR
Nancy Dopp	Cherry Valley	CA
Yvette Doublet-Weislak		CA
Janice Dougall	Agoura Hills	CA
Thomas Douglas		CA
Kristine Dove		CA
Lina Downes	Friday Harbor	WA
Richard Downing	Ahsahka	ID
Amy Dowsett	San Francisco	CA
Eleanor Dowson		WA
Nikki Doyle	Oakland	CA
Ramona Draeger	San Francisco	CA
Shelli Drummer	Olympia	WA
Anish Dube	Simi Valley	CA
Diana Duncan	Santa Monica	CA
Marjorie Dunham	Garden Grove	CA
John Dunn	Vashon	WA
Justin Dunscombe	Mountain View	CA
Linda Dunsmore		CA
Richard Duran		CA
Samuel Durkin		CA
Tim Durnell	Rice	WA
		<i>Protecting the bottom of the food chain is essential if we want our ocean fisheries to recover.</i>
Damon Duval	Santa Monica	CA
Danny Dwinell	Shoreline	WA
Tonya Dysart	San Diego	CA
Eric Ericson	Pacific Palisades	CA
Claudia Eads		CA
Virginia Eagan	Chico	CA
Ben Earle	Portland	OR
Joan Easley		CA
Lara Ebisuzaki	Montrose	CA
John Ecklund	Thousand Oaks	CA
Carolyn Eden		WA
Jay Edgerton	Rancho Palos Verdes	CA

Pandora Edmonston	Mariposa	CA
Anthony Edwards	Del Mar	CA
Leslie Edwards		OR
Carole Ehrhardt	Pebble Beach	CA
Stephen Eichelberger	Tacoma	WA
Frank Eichenberg	Santa Barbara	CA
William Eichinger		CA
Howard Eisenberg	San Mateo	CA
Leah Eister-Hargrave	Seattle	WA
Stephen Ekholm	Bainbridge Island	WA
Glenn Eklund		WA
Steve Eklund	Salinas	CA
Amy Elbert	Fremont	CA
Jim Elliott		CA
Jan Ellis		WA
Paul Ellis	West Linn	OR
Robert Ellis	Oakland	CA
Carlin Ellison		CA
Linda Ellsworth	Eastsound	WA
David Enevoldsen	San Jose	CA
Dixie Lee English	Laguna Beach	CA
Ken Ennis	Bakersfield	CA
Paula Eppler	Portland	OR
Taia Ergueta		CA
Maryann Erickson	Hayden	ID
Deborah Escoto	Riverside	CA
Esmeralda Espinac	Bellevue	WA
Dan Esposito	Manhattan Beach	CA
John Essman	Healdsburg	CA
J Estep		OR
Douglas Estes		CA
Chad Evans	Glendale	CA
Michael W Evans	Los Angeles	CA
Dinda Evans		CA
Storie Ewing		WA
Tracy Ewing		CA
Janet Eyre		CA
Manuela Felkl	SPRINGFIELD	OR
Elizabeth Foree		CA
Keith Fabing	Seattle	WA
Gill Fahrenwald	Olympia	WA
Rita Fahrner	San Francisco	CA
James Fairley	Berkeley	CA
Carol Fairweather	Alameda	CA
Karen Falk		WA
Dominick Falzone	Los Angeles	CA
Judith Farmer		CA
Lorna Farnum	Rossmoor	CA
Beverly Farr		CA

Daniel Farr	Simi Valley	CA	
Bob Farrell	Seattle	WA	
Fred Fawcett	Lafayette	OR	
Cassandra Fazio		CA	
Angela Fazzari	Portland	OR	
Phoebe Fearing		CA	
Lori Fedele	Sun City	CA	
Emily Feingold	Concord	CA	
Janet Feiring		WA	
Ruth Feldman	Alamo	CA	
Ruth Feldman	Fair Oaks	CA	
Grace Feldmann	Santa Barbara	CA	
Alice Felix	Walnut Creek	CA	
Helga Fellay	Carmel Valley	CA	
Laura Ferejohn	Laguna Hills	CA	
James Ferguson		CA	
Linda Ferland	Ventura	CA	
Kait Ferrall		CA	
Lisa Ferreira	Oakland	CA	
Sharon Fetter		WA	
Kathleen Fidaleo		CA	
Elisabeth Fiekowsky	Sebastopol	CA	
Aixa Fielder	Los Angeles	CA	
Mary Fields	Seattle	WA	
D Filipelli, Ph. D.		CA	<i>The following represents my position in support of the removal of Pacific saury from the list of authorized fisheries.</i>
Jamie Fillmore		OR	
Doby Finn	Monmouth	OR	
Mark J. Fiore	San Francisco	CA	
Jason Fish	Rocklin	CA	
Margaret Fish		CA	
Cheryl Fisher		OR	
Kenneth Fisher		ID	
Laurie Fisher	Tigard	OR	
Karen Fishkin	San Francisco	CA	
Ted Fishman		CA	
Todd Fisk		CA	
Stan Fitzgerald	San Jose	CA	
Bob Fitzgerald, M.A.	Tetonia	ID	
Donna Flade	Beverly Hills	CA	
Nancy Fleming		OR	
Jude Fletcher	Oakland	CA	
John Flinn	Portland	OR	
Regina Flores	Lake Elsinore	CA	
Brian Florian	Beverly Hills	CA	
John Flowers		CA	
Kim Floyd	Wrightwood	CA	
Grant Foerster		CA	
Greg Foisie		CA	
Sarah Folsom	Livermore	CA	

Barbara Fontaine	Powell Butte	OR	
Gary Foote		CA	
Julie Ford	Huntington Beach	CA	
Julia Foreman	Bakersfield	CA	
Kim Forrest	Los Banos	CA	
Patricia Forrest	Redwood City	CA	
Hal Forsen	San Clemente	CA	<i>I am writing as a life long fisherman, to thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean.</i>
Ashley Fowler		WA	
Kathleen Fowler		CA	
Terri Fowler	Van Nuys	CA	
Gene Fox		CA	
Louis Fox	san geronimo	CA	
Mark Foy	Berkeley	CA	
Lynne Francovich	Ventura	CA	
Kate Frangos	Vancouver	WA	
Zack Frank	Los Angeles	CA	
Luther E. Franklin	Issaquah	WA	
Martha Huey Franklin	Issaquah	WA	
Larry Franks	Issaquah	WA	
Paul Franzmann	Walla Walla	WA	
Roxann Fraser	Seattle	WA	
Forest Frasier	Benicia	CA	
Carolyn Frazee	Eureka	CA	
Barbara Frazer		CA	
Margaret Frazier	Palm Springs	CA	
Robert Frcek	Los Angeles	CA	
Lisa Fredsti		CA	
Nancy Freedland		CA	
Matt Freedman	Eugene	OR	
Frank Freitas	Moraga	CA	
Christine Freytag		CA	
Marian Fricano	San Jose	CA	
Nancy Friday	Kenmore	WA	
Steve Friedrich	Steilacoom	WA	
Jo Ann Frisch	Livermore	CA	
Julia Frisk	Plumas Lake	CA	
Jackie Fritz	Irvine	CA	
Jack Frost		CA	
Susan Frye	Hemet	CA	
Brian Fuelleman	Los Alamitos	CA	
Jeniffer Fuentes-Mishica	Long Beach	CA	
Jed Fuhrman	Topanga	CA	<i>As a professor of marine biology for over 30 years, I am writing to thank the council for adopting a Fishery Ecosystem Plan that begins to consider how everything is connected in the ocean.</i>
Kristina Fukuda-Schmid		CA	
Lyle Funderburk		OR	
Laura Fung	Nevada City	CA	
Gilda Fusilier	Sacramento	CA	

Barry Gordon	Santa Rosa	CA	<i>Where's the food? That's what we're all going to be asking within the next 50 years, as overpopulation, overfishing, and pollution destroy our oceans.</i>
Ellen Gachesa	Napa	CA	
Bill Gaffney	Huntington Beach	CA	
Mal Gaffney	Lompoc	CA	
Betty Gaines	Antioch	CA	
Mark Galbraith	San Jose	CA	
Maradel Gale		WA	
Diane Gallagher	Rancho Palos Verdes	CA	
Glenn Gallagher	Simi Valley	CA	
Tara Gallagher	Portland	OR	
Thomas Gallagher	Burlingame	CA	
Alex Gallipeau		CA	
Sergey Galushko	Edmonds	WA	
Kim Ganz		CA	
Sharma Gaponoff	Grass Valley	CA	
Paige Garberding		WA	
Armando A. Garcia	Paramount	CA	
Craig Garcia	Friday Harbor	WA	
Gloria Garcia	Whittier	CA	
Hector Garcia		CA	
Jeffery Garcia		CA	
Mary Garcia	Scotts Mills	OR	
Suz Garcia		WA	
David Gardner	Santa Monica	CA	
Mary Ann Gardner	Visalia	CA	
Michelle Gardner	Paso Robles	CA	
Juanita Garnow	Portland	OR	
Carole Garrett	Folsom	CA	
Megan Garrett		CA	
John Gaspar		CA	
Jan Gates		CA	
Arnold Gatti	Livermore	CA	
Gina Gatto	Castro Valley	CA	
Jim Gayden	Vancouver	WA	
Lisa Gee		CA	
Toni Geer		OR	
Craig Geiger	Olympia	WA	
Mija Gentes		CA	
Ernest George	Irvine	CA	
Alice Georgelis		OR	
Gordon Gerbitz	Santa Barbara	CA	
Gregory W. German	Port Townsend	WA	
Brigitte Gibbs	San Diego	CA	
Jody Gibney		CA	
Karyn Gil	Sacramento	CA	
Julie Gilbert		CA	
Michael Gilgun		CA	
Thomas Gillespie		CA	
Monica Gilman		OR	



Dana Ginn	Temecula	CA
Barbara Ginsberg	Santa Cruz	CA
Celeste Gionet-Hawker	San Jose	CA
Mark Giordani	Woodland Hills	CA
Mary Giorgi-Doore	Coeur D Alene	ID
Jean Gladstone	Eureka	CA
Philip Glaser	Laguna Niguel	CA
Richard Glass	Eugene	OR
Janice Glasser	Soquel	CA
Joe Glaston	Desert Hot Springs	CA
Hal Glidden	Bellingham	WA
Janice Gloe		CA
Courtney Glondeniz	El Cajon	CA
Brian Gluck	Santa Rosa Valley	CA
Josefineanne Gobreville	Burbank	CA
Randy Godfrey	Bellingham	WA
John Goeckermann		OR
Meredith Gold	Glendale	CA
Nancy Goldberg		CA
Susan Goldberg	Glendale	CA
Myrna Goldman	Mountain View	CA
Maxane Goldstein	Hacienda Heights	CA
Joseph Golinveaux	Berkeley	CA
Robert Gondell		CA
Carlos Gonsalves	San Jose	CA
Bernie Gonzales		CA
Natalie Gonzales	Pomona	CA
Alan Gonzalez	Long Beach	CA
Terry Gonzalez		CA
Cr Goodman		CA
Diana Goodman		CA
Sue Goodrich		CA
Elizabeth Goodwin		CA
Edward Goral	Montrose	CA
Mildred Gordon	Oceanside	CA
Richard Gorringer, Ph. D.	Portland	OR
Richard Gosney	Olympia	WA
Gene Gossett		OR
Ela Gotkowska		CA
Michael Gotmer		OR
Mark Gotvald		CA
Nancy Gowani	Winnetka	CA
Douglas Gower	San Francisco	CA
Kathlyn Grabenstein	Costa Mesa	CA
Patrick Grady		OR
Deana Graff	San Diego	CA
Charlie Graham	Hillsboro	OR

*In addition to saury, other forage fish such as anchovies are vital for the endangered California Least Tern. I have worked at the breeding colony in Huntington Beach for the past 6 years, and last year the colony breeding was a failure. One of the contributing factors was the lack of forage fish.*

Lauren Graham	San Francisco	CA	
Seana Graham	Santa Cruz	CA	
Joyce Grajczyk		WA	
David Grant	Medford	OR	
Caryn Graves	Berkeley	CA	
Douglas Gray	Santa Ana	CA	
Victoria Grayland	Kenmore	WA	
Alexandra Graziano		CA	
Denise Greaves	San Jose	CA	
Lee Ann Greaves		WA	
June Green		CA	
June Green		CA	
Steve Green	Mount Vernon	WA	
Stephen Greenberg	Nevada City	CA	
Sid Greene	Cazadero	CA	<i>We need to begin to seriously preserve every part of every ecosystem left on the planet</i>
Ken Greenwald		CA	
Eva Grey	Sacramento	CA	
John Griesgraber	Finley	CA	
Sharon Griffen	San Jose	CA	
Enid Griffin	Portland	OR	
L. Griffiths	Beaverton	OR	
Jenny Gronholt	Tacoma	WA	
Mary Guard		WA	
Nan Guardineer	Live Oak	CA	
Jeff Guay	Chewelah	WA	
Milton Guerrero	Santa Monica	CA	
Raquel Guillen	San Francisco	CA	
Tim Guisinger	Camarillo	CA	
Sheila Gunerius	Mount Vernon	WA	
J. Barry Gurdin	San Francisco	CA	
Rand Guthrie	Snohomish	WA	
Nancy Gutierrez		CA	
Anita Gwinn	Amboy	WA	
Stephen Hackney	Grangeville	ID	
Janet Hada	Snohomish	WA	
Gwen Hadland		OR	
Sarah Hafer	Sacramento	CA	
Alan Haggard	San Diego	CA	
David M. Hagler	Salinas	CA	
George Hague	Astoria	OR	
Brenda Haig	Long Beach	CA	
James Haig		CA	
Dia Hakinna	Claremont	CA	
Elizabeth Hale	Portland	OR	
Kimberly Anne Halizak		CA	
A.M. Hall	Tacoma	WA	
Carolyn Hall	Renton	WA	
Charles Hall	Nevada City	CA	
Claudia Hall	Beaverton	OR	<i>"THE GREATNESS OF A NATION &amp; ITS MORAL PROGRESS CAN BE JUDGED BY</i>

THE WAY ITS ANIMALS ARE TREATED." MAHATMA GANDHI. AMERICA WAS BEAUTIFUL, ANIMALS THRIVED, THE AIR WAS CLEAR, THE WATER CLEAN.... THEN, "MAN DISCOVERED" THE CONTINENT. SINCE THAT TIME, WE HAVE PLACED OUR ENVIRONMENT IN JEOPARDY. WE HAVE FOULED THE AIR & DIRTIED THE WATERS. WE HAVE CAUSED THE EXTINCTION OF SPECIES, IN THE AIR, ON THE LAND, & IN THE SEA! PLEASE, I BEG YOU, ENCOURAGE THE FISHERY MANAGEMENT COUNCIL TO PROTECT THE LITTLE FISH WHO FEED THE BIGGER FISH, SEABIRDS, & MARINE MAMMALS! THIS IS THE OCEANS CIRCLE OF LIFE! THIS IS THE CIRCLE WHICH WILL NOURISH AND ENRICH ALL LIFE. WHEN YOU INITIATE MEASURES TO PROTECT FORAGE SPECIES, YOU PROTECT & RECOGNIZE THE IMPORTANCE OF ALL SEA LIFE, ULTIMATELY, YOU PROTECT HUMAN LIFE! PLEASE, DO NOT ALLOW THE GREED OF A FEW TO COST THE LIVES OF MANY!! PLEASE, I BEG YOU, PROTECT THE UNFISHED FORAGE SPECIES, SUCH AS SAURY. ENVISION THE RESTORATION OF CLEAR AIR, CLEAN WATER, THE IMPORTANCE OF ALL, NO MATTER THE SIZE, THEN, LIFE WHICH WILL FLOURISH! NOW TURN THAT VISION TO REALITY! THANK YOU, FOR READING MY PLEA.

Daniel Hall		OR
Gregory Hall	San Marcos	CA
Heather Hall	Seattle	WA
Linda Hall		CA
Natalie Hall	Encino	CA
Yvonne Hall	Elmira	OR
Teresa Haller	Orangevale	CA
Suzanne Hamer	Woodinville	WA
Abby Hamilton	Woodland	CA
Josephine Hamilton		CA
Lisa Hammermeister	Granada Hills	CA
David Hammond		CA
Marcella Hammond	San Diego	CA
James Hampson	San Francisco	CA
Greg & Robin Handgis	Highland	CA
Mark Hanisee	Riverside	CA
Kim Hanks	Sacramento	CA
Laura Hanks	Portland	OR
Steve Hanlon	Los Angeles	CA
Heather Hanly	Oakland	CA
Helen Hanna	Sacramento	CA
Marilyn Hansen	Santa Rosa	CA
Donna Hanson		WA
Phil Hanson		OR
Keeley Harding		OR
Jana Harker	Arcadia	CA
Rebecca Harper	Los Angeles	CA
Vince Harper	Orange	CA
Bruce Harpham	Federal Way	WA
Lynne Harrington-Bullock	Sonoma	CA
James Harris	Stanford	CA
Zoe Harris	San Anselmo	CA
Bill Harris	Portland	OR

*The food chain is essential to ocean health and our own. Please do the right thing.*

*I was not aware of this issue and am in no position of information or experience to analyze it, but, fortunately I have friends who are aware and able to describe the problem and a solution in a manner which I understand and with which I concur. The long range common good demands that we maintain a healthy and balanced environment of interdependent life forms even if it means some of us*

*will be denied a burst of quick wealth exhausting this species and disrupting the aquatic community.*

Nathaniel Harrison		WA	
Randall Hartman	San Clemente	CA	
Heidi Hartman-Arrasmith		CA	
Florence Harty	White Salmon	WA	
Jo Harvey	Pacific	WA	
Joe Harvey	Twain Harte	CA	
Richard Harvey		CA	
Carolina Hasenau	Oakland	CA	
Jerry Hathaway		WA	
Susan Hathaway		CA	
Brenda Hattisburg	Hayward	CA	
Martha Gayle Hawes		CA	
Paula Hawkins		CA	
Bobby Hayden	Portland	OR	
Christine Hayes	Upland	CA	
Jenni Hayes		CA	
Tim Hayes	El Cajon	CA	
Helen LoganHays	Oregon City	OR	
Dennis Hazen		CA	
Yuriko Hazlett	Oxnard	CA	
Kris Head	Garden Grove	CA	
Julie Heath Elliott		CA	
Nancy Heck	Santa Maria	CA	
Ken Hedges	Lemon Grove	CA	
Lin Heidt	San Diego	CA	
Mark Hein	Topanga	CA	
Denine VHeinemann	Portland	OR	
Bridgett Heinly	San Diego	CA	
Christian Heinold	Oakland	CA	
Jill Heishman		WA	
Roberta Heist	Fort Bragg	CA	
Kathleen Helmer	Woodland Hills	CA	
Linda Hendrix	Bend	OR	
Karen Henriksen	Lakeside	CA	
Jackie Henry	Portland	OR	
Terry Hensley	Long Beach	CA	<i>Let's save the saury!</i>
Christina Heon	Arroyo Grande	CA	
Travis Herb	Ashland	OR	
Samuel Hergenrather	Sebastopol	CA	
Bill Herman	Oceanside	CA	
Birgit Hermann		CA	
Larry Hermann	Castro Valley	CA	
Mai Hermann		WA	
David Hermanns	Portland	OR	
Domingo Hermosillo	Kent	WA	
Ana Herold	Pacifica	CA	
Faith Herschler		CA	
Willim Hewes		CA	

Judy Hewitt	Stockton	CA	
Amy Heyneman	Bainbridge Island	WA	
Robert Hicks	Long Beach	CA	
Richard Hieronymus	Friday Harbor	WA	
Nancy Hiestand	Davis	CA	
Frank Hill		CA	
Michael & Barbara Hill	Elbe	WA	
Karen Hiller	Kelso	WA	
Barbara Hilliard	Seattle	WA	
Susan Himes-Powers		CA	
Lanier Hines	San Francisco	CA	
Jeremy Hinkson	Sacramento	CA	
Scott Hinrichs	Gilroy	CA	
D Hinze		OR	
Deborah Hirsch		CA	
Paul Hobi		CA	
Annette Hobrucker	Oakland	CA	
Charles Hochberg	Philo	CA	
K Hodgins	Calabasas	CA	
Dirk Hoekstra	San Francisco	CA	
Rebecca Hoeschler		CA	
John Hogben	Belmont	CA	
Cathy Holden	Sacramento	CA	
Elaine Holder		CA	
Jennifer Holien	Millville	CA	
David Hollier		CA	
Candace Hollis-Franklyn	Tiburon	CA	
Sidney J.P. Hollister	San Francisco	CA	
Ann Hollyfield	Seal Rock	OR	
John Holmes	San Francisco	CA	
Jon Holstein		CA	
Norbert Holter	San Francisco	CA	
Julie Holtzman	Snohomish	WA	
David Home	Walnut Creek	CA	<i>If the ecosystems of the planet are to be maintained it is critical that species not be considered in isolation.</i>
R Hondrick	Sacramento	CA	
Celeste Hong		CA	
Val Hongo-Whiting	Laguna Niguel	CA	
Jan Honore		CA	
William Honsa		CA	
Clare Hooson		CA	
Janet Hoover	Garden Grove	CA	
Lindsay Hope Kern		OR	
Katherine Hopkins	Rancho Mirage	CA	
Jeffrey Horton	Oakland	CA	
Karen Horton	Independence	OR	
Martin Horwitz	San Francisco	CA	
Kat Hostetler	Vashon	WA	
Michael Houda	Prunedale	CA	
Chris House	Playa Del Rey	CA	

Roseanne Hovey	San Diego	CA
William Howald	Marysville	WA
Carol Howard	Oakland	CA
Judith Hower	Forestville	CA
Lisa Hoyt		CA
Irene Hsu	Irvine	CA
Zoe Huang	Oakland	CA
James Hubbard		CA
Sondra Huber	Hillsboro	OR
Lesley Hudak	Orinda	CA
Molly Huddleston	Santa Rosa	CA
Carole Huelsberg		WA
Elena Huerta	West Linn	CA
Karyn Hughes		CA
Siavash Human	Santa Monica	CA
David Humphrey	Three Rivers	CA
Jay Humphrey	Estacada	OR
Paul Hunrichs		CA
Geri Hunter	Novato	CA
Shannon Hunter	San Jose	CA
Ann Hunter-Welborn	Encinitas	CA
Janine Hurd-Glenn	La Mesa	CA
Kristin Hurley	Poway	CA
Linda Hurley	Anaheim	CA
Jeffrey Hurwitz		CA
Renee Hutchins	Concord	CA
Thomas Hutton	Bellingham	WA
Winfield Hutton	Seattle	WA
Jinx Hydeman	Trabuco Canyon	CA
Miriam L Iosupovici		CA
Chris Ibach	Lake Elsinore	CA
Keith Ignatowicz		CA
Karen Ingenthron	Oakland	CA
Lura Irish	Lakebay	WA
Zia Islam	Winnetka	CA
Steve Iverson	Corona Del Mar	CA
Tonya Ivey		CA
Gary Jones	San Marino	CA
Alicia Jackson	Vallejo	CA
Elizabeth Jackson	Elk Grove	CA
Maria Jackson	San Luis Obispo	CA
Ren Jacob	Lincoln City	OR
Linda Jacobs	Campbell	CA
Clara Jacobson	Olympia	WA
Paul Jacobson		CA
Ketzia Jacoby	San Francisco	CA
Nancy Jacques	Bainbridge Island	WA
Brenda Jaime	San Jose	CA
Tina Jaime	San Jose	CA

Janet Jamerson	San Leandro	CA	
Damian James	Oakland	CA	
Janet Kusnick	Los Angeles	CA	
Gayle Janzen		WA	<i>Humans can't keep depleting forage fish and think it won't have catastrophic results!</i>
Marsha Jarvis		CA	
Arturo F. Jasso	Chino Hills	CA	
Lars Jefferson	Albany	OR	
Lynne Jeffries	Laguna Niguel	CA	
Uta Jehnich		CA	
Jean Jensen		WA	
Virginia Jensen		CA	
Patricia Jerrells		WA	
Paul Jerskey	Seattle	WA	
Claire Joaquin		CA	
Angie Johnson	Seattle	WA	
Carolann Johnson	Riverside	CA	
Jesse Johnson	Visalia	CA	
Melanie Johnson		CA	
Patricia Johnson	Sequim	WA	
Shannan Johnson	Windsor	CA	
Stephen Johnson	San Diego	CA	
Susan Johnson	Novato	CA	
Wayne Johnson	San Francisco	CA	
Lee Johnston		WA	
Philip Johnston		CA	
Jane Jolivet	Antioch	CA	
Allison Jones	San Francisco	CA	
Clayton Jones	Shoreline	WA	
D.Wiese Jones	Portland	OR	
Jennifer Jones		OR	
Kyana Jones		CA	
Linda Jones		CA	
V. & B. Jones		CA	
Laura Jones-Bedel	San Diego	CA	
Hadi Jorabchi	Encino	CA	
Dorothy Jordan		WA	
Lil Judd	Sylmar	CA	
Brandon Juhl	Mercer Island	WA	
Rod & Vicki Kastlie		CA	
Kevin Kreiss	Seattle	WA	
Jennifer Kahn		CA	
Jessica Kaiser	Pasadena	CA	
Laura Kaiser	Los Angeles	CA	
Lacey Kammerer	Fresno	CA	
Jan Kampa		CA	
Morgan Kanae	Hanford	CA	
Blair Kangley	Seattle	WA	
Franklin Kapustka	Aloha	OR	
Nowell Karten	Santa Monica	CA	



Paul Kashtanoff		CA
Betty Katowicius	Los Angeles	CA
Joanna Katz	Berkeley	CA
Marilyn Katz	Los Angeles	CA
Marla Katz		WA
Dawn Kauffman	Walnut Creek	CA
Andrea Kaufman	Guerneville	CA
Joel Kay	Milwaukie	OR
Curtis Keedy	Riverside	CA
Margaret Keene		OR
Denise Keeton	Metolius	OR
Kimberly Kehl	Canyon Country	CA
Janet Keller	Merlin	OR
Marcia Keller		CA
Nathan Keller		CA
Shelly Keller		CA
Lauren Kelley	Pasadena	CA
Gerald Kelly	Santa Monica	CA
Joanne Kelly	Monterey	CA
Nancy Kelly		CA
Wayne Kelly		OR
Linda Kennedy	Eagle	ID
Janet Kennington		CA
Alicia Kern		CA
Angela Kerr		WA
Nancy Kerwin	Bothell	WA
Kathy Kestell	Spokane	WA
Mha Atma S. Khalsa	Los Angeles	CA
Meaghen Kidd		CA
Henry Kielarowski	San Francisco	CA
Rebecca Kimsey	Sublimity	OR
Norman Kindig		CA
Suzanne Kindland		OR
Kim King	Nevada City	CA
Sara King	Auburn	WA
Terry King	Oakland	CA
Velma Kingsbury		CA
Francis Kintz	San Francisco	CA
Michael Kiralla	Arcadia	CA
Jade Kiran	San Francisco	CA
Jade Kiran	San Francisco	CA
Helen Kirby	Los Altos Hills	CA
Saran Kirschbaum	Los Angeles	CA
Laurance Kisinger	Shelton	WA
Desiree Kisselburg		CA
Eugene Kiver	Anacortes	WA
Tracey Kleber	Los Angeles	CA
Randal Klefbeck	Milwaukie	OR
Christine Kleiman	Ashland	OR

*This is the 21st century, and time is short to make a difference.*

V. Joseph Klein		CA
Walt Kleine	Emeryville	CA
Matt Kline		CA
Basey Klopp	Bend	OR
Pete Klosterman	San Mateo	CA
Christine Klunder		WA
Georgia Knight	San Francisco	CA
Linda Knight		CA
Elena Knox	Pioneer	CA
Rebecca Kocis		CA
Rachel Kocsis	Simi Valley	CA
Stephen Koepp	Mukilteo	WA
Karl Koessel	Blue Lake	CA
Bette Koetz	Dexter	OR
John Kohler	Agoura Hills	CA
William Lee Kohler	Eugene	OR
Laura Kohn	Hillsborough	CA
Ellen Koivisto		CA
M J Kolb		OR
Meryle A. Korn	Portland	OR
Miriam Korpi	San Francisco	CA
Tatiana Korry	Seattle	WA
Thomas Kostas	Portland	OR
Lynn Kouzel	San Pedro	CA
Diana Kovic		CA
Anna Kowalczyk	Spokane	WA
Donna Kowzan	Moorpark	CA
Gail Koza	San Francisco	CA
Summer Kozisek	Bonney Lake	WA
Irene Kraus	Mission Viejo	CA
Lisa Krausz	Tiburon	CA
Susan Krebs	Van Nuys	CA
Nik Kripalani	San Diego	CA
Evan Jane Kriss		CA
K Krupinski		CA
Eli Kuala	San Diego	CA
Dan Kuklo	Berkeley	CA
Stephen Kunin	Spokane Valley	WA
Richard Kuntze	Monterey	CA
Susan Kurcz-Easom	Pittsburg	CA
Celia Kutcher		CA
Sheri Kuticka		CA
Sharon Kyriakos	Cloverdale	CA
Sharon Lee		OR
Ileana Liel	Riverside	CA
Janis Loveday	Grass Valley	CA
Debra Lucchesi	Adelanto	CA
Tim Lytsell	LOS OSOS	CA
Isabella La Rocca		CA

*Please protect our precious ocean life!*

Roberta Lafrance	San Leandro	CA
Ken Lamance	San Francisco	CA
Maryann Lanew	San Clemente	CA
Sharon Lacy	Sebastopol	CA
Barbara Lafaver	Concord	CA
Samantha Laffie	Stockton	CA
Corinne Lambden		CA
Rick Lambert	Independence	OR
Juliet Lamont		CA
Julianne Lamsek	Seattle	WA
Judith Landau		WA
J Lane		CA
Jim Lansing		CA
Emerald Lanto		CA
Catherine Lanzl	Encinitas	CA
I-Ching Lao	Los Angeles	CA
Larry Lapuyade	San Anselmo	CA
Areil Larsen	San Luis Obispo	CA
Jane Larsen	Encinitas	CA
Diane Laskin		CA
Mikayla Latta		ID
Barbara Laudan	Lynden	WA
Gabriel Lautaro		CA
Charlene Lauzon	Lynnwood	WA
Julie Lawell	Seattle	WA
Nicole Lawless	Eugene	OR
Don Lawson	Modesto	CA
Donna Lawson	Santa Cruz	CA
Gene Lawson	Lynnwood	WA
Jason Lawson-St.Hill		CA
Patricia Layden	Seatac	WA
Ometh Layton		CA
Chryse Leblanc	Seattle	WA
Patricia Leads	Carpinteria	CA
Evelyn Ledesma		CA
Brendan Lee		OR
Ed Lee	Santa Clara	CA
Francis Lee	San Bruno	CA
Ruby Lee	Richmond	CA
Shirley Lee		CA
Teresa Lee		CA
Virginia Lee		CA
Lora Lehner	Port Orchard	WA
Sarah Lehrer-Graiwer	Los Angeles	CA
Patricia Leigh	Winthrop	WA
Laura Leipzig	Berkeley	CA
Miriam Friedel Leiseroff	San Jose	CA
Dawn Leitch	La Quinta	CA
Miranda Leiva		CA

Richard Lemer		OR
Susan Lemer		OR
Hugh Lentz	Olympia	WA
Steve Lerman		CA
Leslie Leslie	Mill Valley	CA
Carol Leuenberger	San Carlos	CA
Daryl Lev		CA
Mary Levandos	San Jose	CA
Adam Levine	Seattle	WA
Sandy Levine		CA
Jonathan & Mrs Levy	Eugene	OR
Amanda Lewis	Portland	OR
Cheryl Lewis		CA
Patrick Lewis		CA
Suzanne Lewis	Stockton	CA
Bill Leyrer		WA
Helena Liber		CA
Diane Liguori	phoenix	OR
Nancy Enz Lill	Spokane	WA
Kortney Lillestrand	Laguna Beach	CA
Joseph Lilli	Pacific Palisades	CA
Olivia Lim		CA
Christopher Lima	Ventura	CA
Christina Lin	South Pasadena	CA
Michael Lin		CA
Stephanie Linam	Benicia	CA
Kj Linarez	Carmichael	CA
Eric Lind	Seatac	WA
Bill Lindner		CA
Virgene Link		WA
Lois Lippold		CA
Tamara Lischka	Portland	OR
Judith Little	Arcata	CA
Marcia Little		CA
Elaine Livesey-Fassel		CA
Delphi Locey	Seattle	WA
Nancy Loewen	San Francisco	CA
Saab Lofton	Seattle	WA
Delvia Logan	Lake Forest	CA
Kerry Logan	Wenatchee	WA
Robert Lohmann	Seattle	WA
Henry Lohr	Albany	OR
Carol Long	Santa Cruz	CA
John M Long	Redmond	OR
Dona Longacre		CA
Wally Longshore		CA
Jon Longsworth		CA
Charles Looney	Scappoose	OR
Nelly Lopez		CA

Ray Lorensen	Fremont	CA
Robin Lorentzen		ID
Heather Lounsbury		CA
Valerie Lovejoy	Williams	OR
Sammy Low		WA
Patsy Lowe	Palm Springs	CA
Bonnie Lowery		CA
Danielle Lowry		CA
Luis Lozano		CA
Bettina Luboff Chapple		CA
K Lucas	Westminster	CA
M. Lucas	Oakland	CA
Diane Luck		OR
Brenda Luebke	Mountain View	CA
Karolin Lund	Seattle	WA
Richard Lunt		WA
Rick Luttmann		CA
Linda Luzadder	Kent	WA
Kay Luzik	Port Orchard	WA
Linda Lyerly		CA
Michael Lyman	Colville	WA
Erin Lynch		CA
Wendy Lynch	Los Angeles	CA
Georgia Lynn		CA
Franceska Lynne		CA
Mary Lyon		CA
Suzanne Lytsell	Los Osos	CA
Maureen M	Marina Del Rey	CA
Jenifer Massey	San Clemente	CA
June Macarthur	Port Orchard	WA
Ronald Macarthur	Port Orchard	WA
Alex Maccollom	Carmichael	CA
Sara Mackusick	Berkeley	CA
Hannah Maclaren	Altadena	CA
Rob Macdonald	Half Moon Bay	CA
Anne Mack	Mercer Island	WA
Donald Mackay		CA
Rich Mackin		OR
Kendra Madden	Elmira	OR
Susanne Madden	Playa Del Rey	CA
Justin Maddox	Lake Stevens	WA
Jan Maddron		OR
Carol Maehr	Monterey	CA
J'Amy Magill	Anacortes	WA
Janet Maker	Los Angeles	CA
Susan Maletsky	Sonora	CA
Kathleen Malley	Tacoma	WA
Sonja Malmuth	Santa Ynez	CA
Megan Malone Franklin		CA

Colleen Malone-Engel	Los Angeles	CA
Robert Mammon	Richmond	CA
Courtney Mann	Van Nuys	CA
Laura Manning		CA
Audrey Mannolini	Huntington Beach	CA
Mariah Maracle	Seattle	WA
Loretta Marcel	San Francisco	CA
Richard Marchick	Orinda	CA
Buzz Marcus		WA
Martin Marcus		CA
Sandra Mardigian`	Mill Valley	CA
Virginia Mariposa	Santa Barbara	CA
Amber Mariscal		CA
Diane Marks		CA
Joan Marks	Tehachapi	CA
Patricia Marlatt	Los Angeles	CA
Anne Marlborough	Lake Balboa	CA
Mick Mars	West Hollywood	CA
Michelle Marsico	Torrance	CA
Bradford Martin		CA
Kathleen Martin		CA
Linda Martin		WA
Marilynn Martin	Palisades	ID
Michael Martin	Mountain Home	ID
Mickey Martin		CA
Scott Martin	Seattle	WA
Jennifer Martinez	Sunnyvale	CA
Michele Martinez		CA
Ray Martinez	Covina	CA
Kathy Martini	Grass Valley	CA
Setsuko Maruki-Fox		OR
Donna Mason		CA
Eileen Massey	Emeryville	CA
Rebecca L. Mastoris	Watsonville	CA
Timothy Mathiason	Salem	OR
Dale Mattes	Pasadena	CA
Kate Matthews	Sunnyvale	CA
Christopher Matthias	Seattle	WA
Barbara Matthiessen	Port Orchard	WA
Nancy Mattson	Seattle	WA
Tamara Matz		CA
Tim Maurer	Anaheim	CA
Tim Maurer	Anaheim	CA
Casee Maxfield	Los Angeles	CA
Geraldine May		CA
Persephone Maywald	Orinda	CA
Joan McAllister		CA
Janet McCalister		CA
Louis McCarten	Glendale	CA

Tom McCarter	San Jose	CA	<i>You need to take into account the entire ecosystem when crafting policy.</i>
Ai McCarthy		WA	
Sharon McCarthy	San Rafael	CA	
Becky McCarty	San Diego	CA	
Jack McClain	Sacramento	CA	
Sandra McConnell		CA	
Douglas McCormick		CA	
Evan Mccoy	Seattle	WA	
Brian McCredie	Ridgecrest	CA	
James McCullough	San Jose	CA	
Amanda McDermott		CA	
Claude McDonald		CA	
Rebecca McDonough	Menlo Park	CA	
Holly McDuffie		CA	
Emily McGehee	Portland	OR	
David McGlocklin	Davis	CA	
Wendy McGowan		OR	
Peggy McGuire	Gerber	CA	
William McGunagle	Spokane	WA	
Rene McIntyre	San Francisco	CA	
Marlene McIver	Novato	CA	
Barbara McKee	Vancouver	WA	
Jerry McKee	La Mesa	CA	
Kathleen McKeehen	Indianola	WA	
Marsjal McKitrick	Sacramento	CA	
Diane McLaughlin	Culver City	CA	
Susan McLaughlin		CA	
Christine McLean	Gig Harbor	WA	
Shawnee McLemore	San Diego	CA	
Michael McMahan		CA	
Michael McMahan		CA	
Gail McMullen	Los Angeles	CA	
Susan McMullen	Lemon Grove	CA	
Robert McNally		CA	
Nick McNaughton	Los Angeles	CA	
Cathy McPeek	Palm Springs	CA	
Danielle McRae	Canyon Country	CA	
Stacey McRae		CA	
Susan McReynolds	San Leandro	CA	
Kelly McVey		CA	
Nancy Mead	Santa Cruz	CA	
Tj Mead	Port Townsend	WA	
Audrey Meade	Seattle	WA	
Ernest Medeiros		CA	
Mark Medina	Rancho Cucamonga	CA	
O Medzihradsky		CA	
Mary Lou Meeks	Palo Alto	CA	
Patricia Meeks		WA	
Ken Meersand		CA	



Apryl Mefford-Hemauer		CA
Michelle Mehlhorn	Richmond	CA
Edward Meisse	Santa Rosa	CA
Kate Mellors	Los Angeles	CA
Ramona Menish	Bellingham	WA
Jane Merkel	Eureka	CA
Michael Merz		CA
Michele Meyer	Vallejo	CA
Twyla Meyer		CA
Joel Meza		CA
Brenda Michaels	Issaquah	WA
Megan Michaels	Napa	CA
Raelyn Michaelson		WA
Debora Michel		CA
Charles Milkewicz	Martinez	CA
A. M. Miller		CA
Albert Miller		CA
Carole Miller	Vancouver	WA
Heidi Miller		CA
John Miller	Bellingham	WA
Lee Miller	Stockton	CA
Nancy Miller		CA
Robert Miller		CA
Rosalind Milliken	Indio	CA
Elinor Mills	San Francisco	CA
Irene Mills	Portland	OR
Melva Mills		CA
Randy Mills		CA
Jim Milstead		WA
Grigory Milyanenko	Everett	WA
Kent Minault	Sherman Oaks	CA
Adolfo Miralles	San Dimas	CA
Ina Mitchell	Van Nuys	CA
Jolina Mitchell	Marina Del Rey	CA
Michelle Mitchell	Claremont	CA
Phylis Mitchell	San Bernardino	CA
Eileen Mitroo		CA
Michael Mitsuda	Fremont	CA
Carol Mock		CA
Lisa Moeller	Santa Barbara	CA
Michael Moeller		CA
Lisa Mohan	Los Angeles	CA
Shana Mokuau		CA
Bianca Molgora	San Francisco	CA
Mayra Molina	Lebec	CA
Gregory Monahan	Lake Oswego	OR
Janet Monfredini		CA
Mark Moniz		CA
Dean Monroe	North Hollywood	CA

James R (Randy) Monroe	Concord	CA
Anthony Montapert		CA
Hugh Moore		CA
Marsha Moore	Kensington	CA
Melissa Moore	Arcata	CA
Sharlee Moore		CA
Mary Etta Moose	San Francisco	CA
Sigrid Moranz	Newport Beach	CA
Tom & Patricia Moreland	Port Townsend	WA
Oscar Moreno		CA
Donald Morey	Walnut Creek	CA
Jane Morgan		CA
Linda Morgan	Caldwell	ID
Linda Morgan	San Pablo	CA
Keith Morris	Los Angeles	CA
Patricia Morris	Santa Cruz	CA
Ray Morris	Bakersfield	CA
Steve Morris	Los Angeles	CA
Susanne Mortensen	Newport Beach	CA
Chris Moser		OR
Bob Mosher		CA
Gerald Moss	Unity	OR
Marjorie Moss		CA
Peter Mounier	Morro Bay	CA
Robert Mueller	Kenmore	WA
Tina Mulcahy		WA
James Mulcare	Clarkston	WA
Mark Mulder	San Jose	CA
Deborah Mulholland		CA
J Muller		CA
Kate Mullins	Portland	OR
Ann Munday	Los Angeles	CA
Kenneth Mundy	Los Angeles	CA
Alex Munguia	Daly City	CA
Daveen Munn	Everett	WA
Jeaanne Munoz		CA
Lauren Murdock		CA
Ann-Marie Murphy	San Francisco	CA
Maureen Murphy	Santa Monica	CA
Verona Murray	Oroville	CA
Adele Myers	Meadow Valley	CA
Linda Myers		CA
Grace Neff	Albany	OR
Jon Noggle	Bellingham	WA
Lewis Nottke	Crestline	CA
Janet Nace	Saratoga	CA
Nikki Nafziger	Vallejo	CA
Jerry Nailon		CA
James Nakata	Citrus Heights	CA

*People must realize the Ocean is not a bottomless pit and over fishing one species will have a direct impact on the health of the entire ocean life.*

Laura Nardozza	San Francisco	CA
Tom Nash		CA
Thomas Nass		CA
J Neal	Rutherford	CA
Sandra Nealon	Laguna Beach	CA
Zachary Nelms	Portland	OR
Matthew Nelson	Kent	WA
Michael Nelson	Monroe	OR
Scott Nelson		CA
Richard Adrian Nelson, Jr.	Santa Barbara	CA
Randall Nerwick		OR
Alice Neuhauser		CA
Joe Neumann	Seattle	WA
Daniel Newell	Seattle	WA
Roberta E. Newman	Mill Valley	CA
Steven Newman	Santa Cruz	CA
Angela Ng		CA
Bonni Nicholdon		CA
David S. Nichols	Portland	OR
Penny Nichols	Middletown	CA
Sharon Nicodemus	Sacramento	CA
Randi Nielsen	Richmond	CA
John Niendorf	Friday Harbor	WA
Christina Nillo		CA
Rebecca Nimmons	Bellevue	WA
Sunnie Noellert		CA
Betty Nogues		CA
Katherine Nolan		CA
Dale Noonkester	Potrero	CA
James Noordyk		CA
Laila Noori	San Jose	CA
Ashlie Norman	Pomona	CA
Linda Norrington		CA
J Norton	Portland	OR
Maria Nowicki	San Francisco	CA
Britney Nucci	Manhattan Beach	CA
Carlos Nunez	Reseda	CA
Sara O'Brien	Willits	CA
Willa O'Connor		CA
Cathleen O'Connell		CA
Mary-Margaret O'Connell		WA
Sherry O'Connor		CA
Julie O'Donnell		WA
Kelly O'Donnell	Los Angeles	CA
Maureen O'Neal	Portland	OR
Michael O'Neill	Tacoma	WA
Catherine Obrien	Pacifica	CA
Dennis Obrien	Seattle	WA
Chris Omeara Dietrich	San Jose	CA

*Thank you for looking at the big picture in our oceans!*

Lee Oakes	San Jose	CA
John Ochsner		OR
Bruce Odelberg	Kirkwood	CA
Norma Odell	Chico	CA
Stephen Oder		OR
Mary Ann Odonnell		CA
Gregg Oelker	Altadena	CA
Audrey Okubo	San Jose	CA
Dylan Oldenburg	Pacific Palisades	CA
Susan Oldershaw	Oakland	CA
Dennis Oliver	Kelseyville	CA
Guy Oliver	Santa Cruz	CA
Coralie Olsen	Kent	WA
Chris Olson		CA
Janet Olson		CA
Sarah Olson		CA
Frances Onesti		CA
Gerald Orcholski	Pasadena	CA
Paul Ordway	Eugene	OR
Mark Orlando	Hesperia	CA
Karen Ornelas	San Pedro	CA
Valerie Orner	San Mateo	CA
Lionel Ortiz	Bayside	CA
Okiyo Ososaka	Oakland	CA
Ananda Osterhaus		OR
Julie Ostoich		CA
Tina Overland	Encinitas	CA
Laura Overmann	Burlingame	CA
Gail Overton	Winterhaven	CA
R Overton	Port Townsend	WA
Roger Overton		CA
Julie Owen	Davis	CA
Emily Owens		WA
Randy Owens		CA
Apostolos Papapostolou	Irvine	CA
Jennifer Parker		CA
Robert Parker Stellato	Redwood City	CA
Grace Padelford	Los Angeles	CA
Urmila Padmanabhan		CA
Adriana Pagano	San Francisco	CA
Michelle Palladine		CA
Phillip Palmejar	San Diego	CA
Francis Palmer	Sacramento	CA
Robert Pann	Los Angeles	CA
Jennifer Pardini	Fremont	CA
Melina Paris	Rolling Hills Estates	CA
Anita Parish	Sweet Home	OR
Anna Parker		CA
Breea Parker		CA

Elaine Parker	Berkeley	CA	
Michael Parker		OR	
Karen Parlette	Eureka	CA	
Adina Parsley		WA	
Lynne Pateman	Los Angeles	CA	
David Patinella		CA	
Hiroko Patterson	Silverdale	WA	
Vincent Patti	Long Beach	CA	
Carol Patton		CA	
James Patton	Los Altos	CA	
Lori Paul, RVT	Altadena	CA	<i>Though the following is a form letter, I could not have stated my views on the need to preserve forage fish, such as saury, for the health of the marine environment. I you and the Council to support sustainable fisheries, which must include active protection of forage fish species at a level of abundance that will support larger marine predators.</i>
Laura Pavloff		CA	
Fay Payton		WA	
Hugh Peach	Beaverton	OR	
J B Pearce Sr		WA	
Juliet Pearson	Grass Valley	CA	
Rae Pearson		WA	
Jerry Peavy		CA	
Deneen Peckinpah	Ashland	OR	
Jane Pelton	Grass Valley	CA	
Jeana Pena	Portland	OR	
Suzanne Pena	Fullerton	CA	
Dolores Pena-Davis	Fullerton	CA	
Jorge Penafiel	Eugene	OR	
Vivian Penniman	La Quinta	CA	
Phil Pennock	Seattle	WA	
Lauren Pepper	Gilroy	CA	
Karen Peralta	Kenmore	WA	
Dan Perdios	Palm Springs	CA	
Cecile Perez	Idaho Falls	ID	
Martha Perez	Portland	OR	
Rich Perez	Torrance	CA	
Eileen Perkins		CA	
Lela Perkins	Everett	WA	
Sandra Perkins		WA	
Roberta Perkns		CA	
K Perlman		CA	
Cyrle Perry	Orinda	CA	
Yuka Persico	Simi Valley	CA	
Jenna Peterson		CA	
Kimberly Peterson	Cloverdale	CA	
Robin Peterson	Madera	CA	
Kyle Petlock	Los Angeles	CA	
Chris Petrakis		CA	
Carolyn Pettis		CA	
Joanne Pflepsen	Seattle	WA	

John Pham	Encinitas	CA	<i>Nothing is more important than to restore the sea that we have depleted to the richness of years past. It is time to be proactive and safeguard our natural resources.</i>
Long Pham	Westminster	CA	
Regina Phillips		CA	
Andy Philpot	Solvang	CA	
Dee Pierce	San Francisco	CA	
Nuri Pierce	La Mesa	CA	
Ed Pinson	Monrovia	CA	
Tina Pirazzi		CA	
Julie Pittenger-Stanley	Oak Grove	OR	
J Pizzo		CA	
Dave Plaehn		OR	
Robert Platt	San Rafael	CA	
Mary F Platter-Rieger	San Diego	CA	
Darrell Plouffe	Everett	WA	
Alice Polesky		CA	
Melissa Polick	Mill Valley	CA	
James Polk	Los Angeles	CA	
Jackie Pomies		CA	
Beverly Poncia	Lower Lake	CA	
Christopher Pond	Glide	OR	
Monteque Pope-Le Beau	Los Angeles	CA	
Joelle Porter	Susanville	CA	
Susan Porter	Pasadena	CA	
Diana Portwood		OR	
Dee Potter		OR	
Miyuki Powell	Midway City	CA	
Kamal Prasad	Santa Rosa	CA	
Sudesh Prasad	San Pablo	CA	
Melissa Presa		OR	
Lynne Preston	San Francisco	CA	
Tari Price		ID	
Steven J. Prince		OR	
Penelope Prochazka		CA	
Stephanie Proctor		CA	
Steven Proe	Greenwood	CA	
Thomas Proett	Redwood City	CA	
L Provencher	Los Angeles	CA	
James Provenzano	Los Angeles	CA	
Mary Prubant	San Jose	CA	
Dean Pryer	Eugene	OR	
Cindy Psareas	Irvine	CA	
Richard Puaoi	Novato	CA	
Alisa Puerta	Pacific	WA	
Steve Purvis	Santa Monica	CA	
Brad Putz	Sonora	CA	
Matthew Quellas	Los Angeles	CA	
Phoebe Quillian		OR	
Patricia Quimby		CA	

Nayda Quinones		CA
Cherie Reeves-Rutledge	Central Point	OR
Fran Reyes	Los Banos	CA
Barbara Rice	Walnut Creek	CA
Jay Richards	Bend	OR
Berklee Robins	Lake Oswego	OR
Forrest Rode	Seattle	WA
Brad Rae	Lake Forest	CA
Annette Raible	Petaluma	CA
Sharon Rakunas		CA
Alberto Ramon	El Sobrante	CA
Paul Ramos	Santa Ynez	CA
Rudy Ramp	Arcata	CA
John Rand	Tehachapi	CA
Mel Randall	Studio City	CA
Jonathan Raney	Bellingham	WA
Peggy Ranson		WA
James Ranstrom		WA
Patricia Ranstrom		WA
Cynthia Ratliff	Santa Cruz	CA
Karen Ratzlaff		CA
Maria Rausis	Mountain View	CA
George Rawley		CA
Rocky Rawstern		OR
George Raymond	Palm Springs	CA
Joseph Razo	Camarillo	CA
Patricia Re		CA
Lisa Read	Seattle	WA
Mark Reback	Los Angeles	CA
Maryellen Redish	Palm Springs	CA
Linda Redman	West Hollywood	CA
Mark Redmond		WA
Randi Reed	North Hollywood	CA
Robert Reed	Lake Elsinore	CA
Melissa Rees	Spokane	WA
Brenda Reese	Campbell	CA
Gary Reese		CA
Nora Regan		WA
Bill Rehberg	Bellevue	WA
Brian Reid	Spokane	WA
Misti Reif	San Francisco	CA
John Reilly	Lincoln	CA
Robin Reinhart	San Diego	CA
Gayla Reiter	Benicia	CA
Simone Rendell-Shelby	Los Angeles	CA
Ann Rennacker	Fort Bragg	CA
Kristen Renton	North Hollywood	CA
Martha Reyneveld	Seattle	WA
Kevin Reynolds	Hayward	CA



Ronda Reynolds	Idaho Falls	ID
Blythe Rhoades	Gridley	CA
Chris Rice		CA
David Rice	Los Angeles	CA
Jay Rice		CA
Susan Rice		CA
Roz Rickman	Castro Valley	CA
Lynette Ridder		CA
Linda Riebel		CA
Linda Rieland	Seattle	WA
Brendalee Riley	Long Beach	CA
Callie Riley	Citrus Heights	CA
Martin Riley	Corona	CA
Arlene Rinaldo		CA
Leslie Rink		CA
Jen Rios	San Jose	CA
Robert Rippetoe	Rancho Mirage	CA
Alisa Risso	Rsm	CA
Norman Ritchie	Portland	OR
Rebecca Ritter	Healdsburg	CA
Edgar Rivero	Fullerton	CA
Margaret Roach	San Francisco	CA
Barbara Robbin		CA
Lance Robert	San Diego	CA
Brock Roberts		OR
Cristina Roberts	El Centro	CA
James Roberts	Palouse	WA
K Roberts		CA
Steve Robey	Berkeley	CA
Lisa Robie		CA
Jennifer Robins	Huntington Beach	CA
Barbara Robinson	Spokane	WA
Dawn Robinson	Mill Valley	CA
Merrily Robinson		CA
Patricia Robinson	Garden Grove	CA
Richard Robinson	Big Bear City	CA
Cassie Robles		OR
Sidney Robles		CA
Priscilla Rocco	Costa Mesa	CA
Candace Rocha		CA
Candy Rocha		CA
Janice Rocke	Carmel	CA
Terrell Rodefer	Van Nuys	CA
Colleen Rodger		CA
Diana Rodgers	Penngrove	CA
Patricia Rodgers		WA
Sharon Rodrigues		CA
Karley Rodriguez	San Francisco	CA
Christina Roe	Fresno	CA

Connie Rogers		CA
James Rogers	Richmond	CA
Kathleen Rogers	Paramount	CA
Margaret Rogers	Redwood City	CA
Robert Rohr		CA
Lenore Roiz	San Francisco	CA
Lisa Roll		CA
Gwen Romani	Castaic	CA
Gwen Romani	Castaic	CA
Sandy Rome	Nmpa	ID
Valerie Romero		CA
Van Rookhuyzen		CA
Diane Rooney	El Cerrito	CA
Barbara Root	Mckinleyville	CA
Charlene Root	Whittier	CA
Jessie Root	Oceanside	CA
Greg Rosas		CA
Barbara Rosenkotter	Deer Harbor	WA
Howard Rosenthal	San Mateo	CA
Pamela Rosenthal	Santa Rosa	CA
Richard Rosenthal	Los Angeles	CA
David Ross		CA
Eric Ross		OR
M Ross		CA
Michael Rotcher		CA
Roxanne Rothafel	Santa Cruz	CA
Chris Rowley	West Hollywood	CA
Janalee Roy	Tacoma	WA
Allen Royer		CA
Susan Rubin	Los Angeles	CA
Tom Rudholm	Modesto	CA
Amanda Rudisill	Olympia	WA
Stephanie Rufner	Beaverton	OR
Martin Rugger	Portland	OR
Rikje Maria Ruiter		CA
Sylvia Ruiz		CA
Elena Rumiantseva	Seattle	WA
Thomas Rummel	Los Angeles	CA
Carol Russell		CA
Elaine Russell	Long Beach	CA
Julia Russell	Sacramento	CA
Michael Russell	San Francisco	CA
Ben Ruwe	Felton	CA
Paul Ryan	Napa	CA
Shelly Ryan	Antioch	CA
Katherine Rykowski		CA
Carmen Sanchez Sadek	Los Angeles	CA
Nancy Schlegel	Carmel Valley	CA
Ernest Scholz	San Francisco	CA

iiiMUCHÍSIMAS GRACIAS!!!

Jake Schwartz	Petaluma	CA	FOR THE NATURAL MAJESTY OF OUR NATION, PLEASE DO THE RIGHT THING. NOW. REMOVE THE PACIFIC SAURY FROM THE LIST OF AUTHORIZED FISHERIES. THANK YOU.
Patrice Sena	Pasadena	CA	
Carole Shelton	Los Angeles	CA	
Janine Stokes	Riverside	CA	
Gretchen Sackett	San Francisco	CA	
Roger Sadler	Highland	CA	
Zandra Saez	Spokane	WA	
Sylvia Sage	Elma	WA	
Nina Sagheb	San Diego	CA	
Scott Saint Blaze		CA	This issue is well worth at least looking into. Thank you for your time.
Mark Salamon	San Mateo	CA	
Vidal Salas		CA	
Joe Salazar	Santa Rosa	CA	
Lisa Salazar	Foster City	CA	
Rocio Salazar		CA	
R Salido		CA	
Jeff Salvaryn	Redondo Beach	CA	
James Sams	San Diego	CA	
Delmer Sanburg, Jr.	Los Angeles	CA	
Jackleyne Sanchez	Compton	CA	
Urmila Joi Sandhu	Willits	CA	
Gustavo Sandoval	San Mateo	CA	
Susan Sankarshanan	Beaverton	OR	
Natasha Sankovitch	La Jolla	CA	
Kathryn Santana	Bradbury	CA	
Walter Santucci	Studio City	CA	
David Saperia	Santa Monica	CA	
Marijeanne Sarraile	Pittsburg	CA	
Julie Sasaoka	Concord	CA	
Nancy Sato	Belmont	CA	
Debra Saude	Sweet Home	OR	
Dan Sauer		OR	
John Saul	Kirkland	WA	
Janet Saunders	La Conner	WA	
Patricia Savage	Mammoth Lakes	CA	
Buck Sawyer	Oxnard	CA	
Marvin Sawyer	Yucca Valley	CA	
Carol Sawyers	Santa Cruz	CA	
Rodolfo Scarpati	Castro Valley	CA	
Kira Schabram	Valley Springs	CA	
Valerie Schadt	Los Angeles	CA	
Mark Schecter	Cayucos	CA	
Robert And Dolores	Scheelen	OR	
Karen Scheuermann	Cottonwood	CA	
Lauren Schiffman		CA	
Mary Schilder	Santa Rosa	CA	
Debbie Schlenoff		OR	
Henry Schlinger	Burbank	CA	

Nadya Schmeder	Napa	CA	
Jaylen Schmitt		OR	
Casey Schnaible	Medford	OR	
Dan Schneider		WA	
Loxi Schneider	Bremerton	WA	
Gillian Schultz		CA	
Brandy Schumacher	Citrus Heights	CA	
Evelyn Schumacher		CA	
Tracey Schuster	Los Angeles	CA	
Mark Schuster		OR	
Ron Schutte	San Diego	CA	
Nettie Schwager		OR	
Joseph Schwartz	Glendale	CA	
Linda Schwartz	Cannon Beach	OR	
Ronlyn Schwartz		WA	
Chris Scott		CA	
David Scott	Ontario	CA	
Johanna Scott		CA	
Kate Scott		WA	
Denee Scribner	Ellensburg	WA	
Deanna Seagraves	Soquel	CA	
Ron Season	Calabasas	CA	
Mary Sebek		WA	
Linda Seeley	Arroyo Grande	CA	
Frank Seewester	Fairfield	CA	
John Sefton		CA	
Ellen Segal	Palm Springs	CA	
Evalyn Segal, PhD	Walnut Creek	CA	
Spencer Selander	Castle Rock	WA	
Winke Self		CA	
Vic Selten	Palm Springs	CA	
Rob Seltzer		CA	
Steve Senigram	Los Angeles	CA	Thank you for considering my comments and for your continued commitment to a productive marine environment, so that when my children are grown, they will be able to enjoy the same marine life as we do now.
Jon Senour		CA	
Christine Sepulveda	Anaheim	CA	
Steven Serbousek	Bremerton	WA	
Peter Sergienko	Portland	OR	
Michael Serra		CA	
Mari Serrano	Santa Clarita	CA	
Neena Sessa		CA	
Percy Severn	Newbury Park	CA	
Paul Shabazian		CA	
Danae Shadburn		CA	
Linda Shadle	Anaheim	CA	
Paula Shafransky	Sedro Woolley	WA	
Mariam Shah-Rais	Los Angeles	CA	
Gerald Shaia	Sun Valley	CA	
Susan Shampo		OR	

Timothy Shanahan		CA
Susan Shapira		CA
Marybeth Sharp	Grants Pass	OR
Diane Shaughnessy	Tacoma	WA
Anore Shaw		CA
Peter Shaw		OR
Phyllis Shaw		CA
Stuart R. Shaw	Salem	OR
Sheila Shearer	Hood River	OR
Steve Sheehy	Klamath Falls	OR
Gabriel Sheets		CA
Dorothy Shelley	Napa	CA
Ian Shelley		OR
Dodie Shepard	Burbank	CA
Marilyn Shepherd		CA
Lindsey Shere	Healdsburg	CA
Gabriel Sheridan	Portland	OR
George Sheridan	Garden Valley	CA
Wayne Sheridan	San Francisco	CA
Nina Sherman	San Francisco	CA
Richard Sherman & Family		CA
Nick Shestople		CA
Beverly Shields	Long Beach	CA
Clark Shimeall	Borrego Springs	CA
Paul Shively	Portland	OR
Martha Shogren		CA
Patricia Shortt	Coronado	CA
Nathaniel Shrage		CA
Dean Shrock		OR
Joseph Shulman	San Diego	CA
Mary Lou Shurtleff	Sacramento	CA
Marguerite Shuster	Sierra Madre	CA
John Shutt	Marina Del Rey	CA
Rick Siegfried	Eureka	CA
John Signore	Medford	OR
Sheila Silan		CA
Elizabeth Siler	Pullman	WA
Joe Silk	Riverside	CA
Alyssa Silver	Thousand Oaks	CA
Jon Silver	Portola Valley	CA
Linda Silver	Portland	OR
Julian Siminski	Studio City	CA
Twikie Simms	Anaheim	CA
E. Sylvia	Simpson	CA
Laura Simpson	Mckinleyville	CA
Karen Sinclair	Grants Pass	OR
D. Singer	Oakland	CA
Scottie Singer	Hemet	CA
Loni Sipes	Sacramento	CA

Subrata Sircar		CA
A. Sirmenis		CA
Heather Skelley	Brisbane	CA
Gloria Skouge		WA
Richard Skwarek		CA
Nancy Slanger		CA
Debra Slater		OR
Julie Slater-Giglioli	West Hollywood	CA
Nicole Slaton	Davis	CA
Carol Slaughter	San Diego	CA
Jean Slocum	Seattle	WA
Angela Smith		WA
Benita Smith	Berkeley	CA
Bret Smith	Santa Cruz	CA
Casey Smith		CA
Cynthia Smith		CA
David A. Smith	Irvine	CA
Denise Smith	Salem	OR
Devin Smith	Seattle	WA
Edwina Smith	San Francisco	CA
Gaye Smith		CA
Gary Smith	Camas	WA
Gaye Smith		CA
Judith Smith	Oakland	CA
Julie Smith		CA
Kathleen Smith	Concord	CA
Kristin Smith		OR
Lee Smith	Beverly Hills	CA
Lee Smith	California Hot Springs	CA
Robert Smith		CA
Shirley Smith	Veneta	OR
Seth Snapp	Bellingham	WA
Ronda Snider	Gig Harbor	WA
Darcey Snow	Spokane	WA
Jon Snyder	Rancho Cucamonga	CA
Shanna Snyder	Clarkston	WA
Todd Snyder	San Francisco	CA
David Soares		CA
Monique Soares	Freedom	CA
Fred Sokolow	Santa Monica	CA
Rita Sokolow	Los Angeles	CA
Erica Sommers	Ventura	CA
Rachel Sonnenblick		CA
Joyce Sortland		CA
Gabriela Sosa		CA
Madeleine Sosin		WA
Michael Souza		CA
Michael Spadoni	Rail Road Flat	CA
Gregg Sparkman		CA

Donita Sparks	Los Angeles	CA	<i>PLEASE PROTECT OUR OCEAN WILDLIFE!</i>
Patty Sparks		CA	
Rick Sparks	Toluca Lake	CA	
Scott Species	Seattle	WA	
Gayle Spencer	Menlo Park	CA	
John Spencer	Edmonds	WA	
Nancy Spencer	Edmonds	WA	
Julie Spickler		CA	
Karen Spiegel	Burbank	CA	
Merri Spingel	Sylmar	CA	
Dollie Spinks	Concord	CA	
Jytte Springer		CA	
Roger & Janette St Pierre	Eugene	OR	
Erica St. John	Hillsboro	OR	
Steven Standard		CA	
Gl Stanford	San Diego	CA	
Kim Stanley	Bainbridge Island	WA	
Jack Stansfield		WA	
Jerry Stansfield	Everett	WA	
Chester Stark	Portland	OR	
James Stark		CA	
Oliver Starr	Woodacre	CA	
David Stassen		CA	
Carrie Staton	Santa Cruz	CA	
Nicole Staudinger		OR	
Barrie Stebbings		CA	
Cheryle Steele	Whittier	CA	
Jeff Steenbergen	Seattle	WA	
J:On Steenhoven	Santa Rosa	CA	
Charleen Steeves		CA	
Eric Steffen	Richmond	CA	
Wayne Steffes	Redding	CA	
Richard Steiger	San Jose	CA	
Joseph Steinberger	San Francisco	CA	
Alex Steinbrecher	Lafayette	CA	
Dorothea Stephan		CA	
John Steponaitis	San Francisco	CA	
Karl Steudel	Burbank	CA	
Arlene Stevens	Sacramento	CA	
Dinah Steward	Los Angeles	CA	
Christine Stewart	Escondido	CA	
Michael Stewart		CA	
Rebecca Stewart	Sacramento	CA	
Richard Stewart	Westminster	CA	
Joanna Stiehl	San Francisco	CA	
Ron Stock		CA	
Bob Stoddard	Spokane	WA	
Connie Stomper	Santa Barbara	CA	
Karen Stone	Laguna Hills	CA	

Peter Stone	Rancho Santa Fe	CA
Mika Stonehawk	Tustin	CA
Emily Storar	Sacramento	CA
Tiffany Story	Summerland	CA
Marisa Strange		CA
Gerald Stratman		CA
Anthony Stratton	Elk Grove	CA
Paul Strecker	Sonoma	CA
Kim Stribling		CA
Mary Ellen Strote	Calabasas	CA
Star Studonivic		OR
J Stufflebeam		OR
Shelley Stump		OR
Catherine Sturgeon	Los Angeles	CA
Sheila Suarez		CA
Steven Sugarman	Malibu	CA
Brian Sullivan	Lakewood	WA
Jay Sullivan	Gig Harbor	WA
Michael Sullivan	San Diego	CA
Kathleen Sumida	San Diego	CA
Beverly Suminskiu		CA
Patrice Summers		CA
Amber Coverdale Sumrall	Soquel	CA
Herschel Surdam		CA
Constance Sutton	Berkeley	CA
Erin Suyehara	Torrance	CA
Bo Svensson	Santa Rosa	CA
Linda Swan	Snohomish	WA
Peter Sweeny	Walnut Creek	CA
Rob Switalski		WA
Thomas Swoffer		WA
Walter Sykes	Joseph	OR
Angee Sylvester	Lancaster	CA
Joseph Szabo		CA
Barbara Temple-Thurston		WA
Justine Tilley	Los Angeles	CA
Michael Toobert	Grass Valley	CA
Kenneth Tabachnick	Woodland Hills	CA
Tenaya Tabler	Santa Barbara	CA
Jaycel Tacchi	San Rafael	CA
Barbara Tacker	Camarillo	CA
Kristopher Taft	Portland	OR
Carol Taggart	Menlo Park	CA
Jacques Talbot	Oakland	CA
John Tangney	Happy Valley	OR
S. Julie Tankenson	Los Angeles	CA
Angelika Tann	Spokane	WA
Barbara Taps	Laguna Niguel	CA
Polly Tarpley	Poulsbo	WA



Letitia Tarver	Astoria	OR	
Donald Tayloe	Fresno	CA	
Emily Taylor	Los Angeles	CA	
J. Holley Taylor	Penn Valley	CA	
Lisa Taylor	Olympia	WA	
Robert Taylor	Porterville	CA	
Timothy Taylor	Los Angeles	CA	
Valerie Taylor		CA	
John Teevan	Chula Vista	CA	
Cindy Tejeda	Los Angeles	CA	
Michael Terry	Santa Monica	CA	
Terelle Terry	Sacramento	CA	<i>An ecosystem begins with water and earth and air. The biosphere includes the smallest of plankton, the smallest larva and eggs, the tiniest fish, and so on until we get to the kind of seafood that humans like.</i>
Sarah Teubner		OR	
Carrie Thomas	Huntington Beach	CA	
Eleanor Thomas		CA	
J Thomas	San Francisco	CA	<i>PLEASE STOP KILLING EVERYTHING SO GREEDY PROFITEERS CAN MAKE MORE MONEY AT THE EXPENSE OF THE NEXT GENERATION. HAVE THE DECENCY TO BE ASHAMED THAT WE HAVE MADE THEIR LIVES SO HARD AND THAT THEY WILL DIE YOUNGER THAN THIS GENERATION BECAUSE OF THE POISONS AND DESTRUCTION OF OUR LIFESTYLES AND GOVERNMENT.</i>
James Thomas		WA	
Mary Thomas	Richmond	CA	
Christine Thompson	Altadena	CA	
Kimberly Thompson		CA	
Lauren Thompson		OR	
Lawrence Thompson	Livermore	CA	
Robert Thompson	Enumclaw	WA	
Debbie Thorn		WA	
Gary Thornbrugh		CA	
Robert Thornhill	Los Angeles	CA	
Pamela Thurston	San Jose	CA	
Nadya Tichman	Oakland	CA	
Amber Tidwell	Los Angeles	CA	
Gabriela Till	San Diego	CA	
Bonnie Tilly	Escondido	CA	
A. Todd		OR	
Laurie Todd	Portland	OR	
Michael Todisco		CA	
Margaret Toews	Menlo Park	CA	
Richard Tomaselli	Berkeley	CA	<i>The following message says it much better than I could. I agree with it 100%.</i>
Pela Tomasello		CA	
Michael Tomczyszyn	San Francisco	CA	
Vaclav Tomek	Seattle	WA	
Bobby Tong	Santa Clarita	CA	
Supporter Took-Zozaya	Capitola	CA	
Ofelia Torres	Thousand Oaks	CA	
Tatiana Torres		CA	
Sharon Torrisi		CA	
Jennifer Toth		CA	

Lana Touchstone		CA
Donna Toward		CA
Gloria Towers		CA
Patricia Towers	Woodland Hills	CA
Bruce Traficante	San Francisco	CA
Gene R. Trapp	Davis	CA
Stephanie Trasoff	Blaine	WA
Teri Travis	Seattle	WA
Kandeda Trefil	Albion	CA
Dennis Trembly	Los Angeles	CA
Maria Trevizo	Olympia	WA
Tia Triplett	Los Angeles	CA
Susan Trivisonno	San Jose	CA
Mary Trujillo	Alhambra	CA
Christine Trumbly		CA
Marianna Tuchscherer	Venice	CA
Dennis Tudos	Lake Tapps	WA
Alexandra Tufnell		WA
Gabriella Turek	Pasadena	CA
Joy Turlo		CA
Joan Turner	Portland	OR
Dale Turnipseed	Twin Falls	ID
J. Gregory Twain	Portland	OR
Steve Tyler	Orange	CA
James Tyree li	Portland	OR
Alberto Urbano	POPYAN	CA
Richard Ullom	Portland	OR
Timothy Ulrey	Portland	OR
Linda Ulvaeus	Eugene	OR
Kirsten Underwood	Seattle	WA
Roselva Ungar	Santa Clarita	CA
Ruth Ungar	Oakland	CA
Michelle Unger		OR
Tim Upham	Tumtum	WA
Brad Upton	Corvallis	OR
Naya Urla		CA
Steve Uyenishi	Seattle	WA
Guadalupe Valdez	North Hollywood	CA
Corey Valenzuela		CA
Natalie Van Leekwijck	Beaverton	OR
Keaven Van Lom	Truckee	CA
Robin Van Tassell	San Rafael	CA
Charles Van Wey	Seattle	WA
Maureen Vanderbosch		CA
Julie Vandergrift	Fullerton	CA
Lisa Vandermay	Renton	WA
Ron Varasteh	Irvine	CA
Dorothy Varellas	San Francisco	CA
Satya Vayu		OR

Reuben Veek	Mountain View	CA
Gabriela Velasquez		CA
Amy Veloz	Van Nuys	CA
Sherri Venezia	Davis	CA
Bill Ventre		ID
Ava Venturelli	Burbank	CA
Damai Vergara-Hegi		CA
Paul Vesper	Berkeley	CA
Phoenix Vie	Berkeley	CA
Darlene Vigil	Rowland Heights	CA
Barbara Viken	San Francisco	CA
Karen Vincent	Burlington	WA
Renee Vincent	Eastsound	WA
Kerry Vineberg		CA
John Vinson		WA
Carlene Visperas		CA
Carlene Visperas		CA
Rowena Vogel	Granada Hills	CA
Nancee L Volpi	Stockton	CA
Kay Von Tress	Menlo Park	CA
Siamak Vossoughi	San Francisco	CA
M. W.	Brookings	OR
Cody Walters	Bakersfield	CA
Martin Ward	San Pedro	CA
Stephen Wille	Vancouver	WA
Emily Willoughby	Tukwila	WA
Herman Waetjen	San Anselmo	CA
Benjamin Wagner	Port Orchard	WA
Florence Wagner	Lopez Island	WA
Douglas Wagoner		ID
Mare Wahosi		WA
Ed Wainio	San Diego	CA
Garrett Waiss	Bainbridge Island	WA
Aurea Walker	Los Angeles	CA
Christopher Walker	San Francisco	CA
Joan Walker		CA
Laura Walker	San Francisco	CA
Mary Walker	Aumsville	OR
Peter Walker	Morgan Hill	CA
Leticia Wallace	Merced	CA
Margaret Wallace		CA
Aleta Wallach	Santa Monica	CA
Shirley Wallack	Santa Rosa	CA
Kirk Walser	Modesto	CA
Dixie Walter	Eatonville	WA
Jeff Walton	Bend	OR
Dolly Warden		OR
Dee Warenycia		CA
Charles Warner	Fontana	CA

Ollie Warner	San Pablo	CA
Tim Warner	Los Angeles	CA
Cara Warren	Roseville	CA
Jason Warshawsky		CA
Scott Warwick		CA
Rose Wasche	Lake Oswego	OR
Scott Washburn	Seattle	WA
Nancy Washton	Richland	WA
Colin Waters	Santa Susana	CA
Kristine Waters		CA
Courtney Watson	Corona Del Mar	CA
Larry Watson	Salem	OR
Michael Watson		CA
Shawna Watson	Ontario	CA
Ann Watters		OR
Susan Watts		CA
Trevor Watts		OR
Kathleen Waxdelk	San Luis Obispo	CA
Susan Wayne	xxx	CA
Tom Wayson	Claremont	CA
Joan Weaver	Chatsworth	CA
Glenn Webb	Pinole	CA
Patricia Webber	Coronado	CA
Mark Weber	Twin Falls	ID
Susan Wechsler	Corvallis	OR
Sharon Weeks	Paso Robles	CA
Kenneth Weidner	Berkeley	CA
Carolyn Weinberger	Berkeley	CA
Mark Weinberger		CA
Nona Weiner	San Jose	CA
Peter Weiner	Sugarloaf	CA
Diane Weinstein	Issaquah	WA
Marie Weis	Fox Island	WA
Steve Weiss	Burbank	CA
Mike Weiss		CA
Russell Weisz	Santa Cruz	CA
Leslie Welles	Los Angeles	CA
Greeley Wells	Jacksonville	OR
Mary Wells	Middletown	CA
Valarie Welte	San Rafael	CA
Judith Wemmer		CA
Katharine Wert	Dundee	OR
Preston Wheaton		WA
Hazel Wheeler		OR
Jennifer Wheeler	Gold Bar	WA
Mark Wheeler	Portland	OR
Robert Wheeler	Murrieta	CA
Luann Wherry	San Diego	CA
Linda Whetstine	Poway	CA

Dave Whipple	Pacific Grove	CA
L Whipple		CA
Sarah Whistler		CA
Richard Whitaker	San Francisco	CA
Pat Whitaker		CA
Earl White	Kent	WA
Jeffrey White	Forest Grove	OR
Lois White		OR
Maria White		OR
Nancy White	Spokane Valley	WA
Vilma White	Temecula	CA
Carol Whitehurst	Mckinleyville	CA
Carol Whitehurst	Tacoma	WA
Hollis Whiting		CA
Laura Whitnell	El Dorado Hills	CA
Mary Whitney	Carmel	CA
Sherri Whittenburg		CA
Thomas Wicks	Bellevue	WA
Scott Widdas	Silverdale	WA
Sarah Wiebenson		OR
Jill Wiechman		CA
Richard Wightman	Arcadia	CA
Vicki Wiker	San Clemente	CA
Antoinette Wilcox	Sunnyvale	CA
Briana Wilcox	Riverside	CA
Laurin Wild		OR
Carol Wiley	Victorville	CA
Daniel Wilkinson	Long Beach	CA
Cynthia Williams	Boise	ID
Ian Williams		CA
Jayna Williams	Pomona	CA
Joseph & Diane Williams		WA
Sara Williams		CA
Cheryl Willis		CA
Jennifer Willis	San Francisco	CA
Jane Wilson	Oregon City	OR
Regina Wilson-Seppa	Penngrove	CA
Arlene Wiltberger	San Carlos	CA
Dean Windh	Lakewood	WA
K. Winnick		CA
Amanda Withrow		CA
Andreas Wittenstein	Woodacre	CA
Wendy Wittl	Santa Barbara	CA
Keith Woelbing	Eugene	OR
Marc Woerschling		CA
Gene Wolery		WA
Esther B. Wolf		WA
Charles Wolfe	Sylmar	CA
Kathleen Wolfe		WA

Susan Woltz	Burien	WA
Rev. Jeffrey Womble	Lodi	CA
Michelle Wong	South Pasadena	CA
Cynthia Wood	Bolinas	CA
Linda Woodall	Kennewick	WA
Kate Woods	Paicines	CA
Matt Woolery		CA
Jo-Ann Work		CA
Denise Wright	Los Angeles	CA
Madeline Wright		CA
Patti Wright	Bellingham	WA
Aimee Wyatt		CA
Aimee Wyatt		CA
Pamela Wylie		CA
Marlene Yallup	Wapato	WA
Bryann Ybarra-Weckmann	Willows	CA
Hailey Yeager	Los Angeles	CA
Stephen Yeh	Oakland	CA
Stefanie Yellis	Oakland	CA
George Yonge	Davis	CA
K. Youmans	Roslyn	WA
Guy Zahller	Aptos	CA
Victor Zamora		CA
Natalie Zarchin		CA
Joan Zawaski		CA
Johanne Zell		CA
Tim Zemba	Los Angeles	CA
Alysha Zgrabik	Thousand Oaks	CA
Dong Zheng	Los Altos	CA
Thom Zimerle		CA
Arlene Zimmer	Rancho Palos Verdes	CA
Susan Zimmerman	Gilchrist	OR
Muriel Zimmermann	Calimesa	CA
Marlene Zobayan		CA
Cheryl Zollman		ID
Aline Zonta		CA
Ken Zontek	Yakima	WA
Glen Zorn	Seattle	WA
Katie Zukoski		CA
Suzanne A'Becket		CA
Bev Abbey		CA
Saliha Abrams	Carson	WA
Dave Alexander	Bellflower	CA
John Alexander	Chico	CA
Dennis Allen	Santa Barbara	CA
Steve, Rachael Alvarez-Jett		CA
Isabella Amoroso		CA
Kathy Anaya		CA
Emily Anderson		CA

J Angell		CA
Chet Arachy		CA
Russell Archer		OR
Lisa Armendarez	Laguna Beach	CA
Marsha Armstrong	Los Gatos	CA
Pierre Asmar		CA
Ed Atkins		CA
Marwa B		CA
Terry Badger	Paso Robles	CA
Mercedes` Baker	Sunnyvale	CA
John Balsano		CA
Carol Banever	Los Angeles	CA
Ronald Banks	Los Angeles	CA
Melissa Barouch		CA
Dennis Barrett		CA
Bryce Beal	San Francisco	CA
Melissa Beckoff	Hesperia	CA
Jorge Belloso-Curiel		CA
Annie Belt	San Jose	CA
Adolfo Bermeo		CA
Reva Biers		CA
Henry Biggins		CA
Ken Bobrow	Walla Walla	WA
Ernest Boyd		CA
Henry Boyle		CA
Arlene Broderick		CA
Myrna Brown	Rosemead	CA
Deirdre Brownell		CA
Babette Bruton		CA
Babette Bruton		CA
Nunya Busi		CA
Kx Bx		CA
Anita C	Cardiff By The Sea	CA
Vicki Call	Santee	CA
M. Canter		CA
Nikki Caputo		CA
Patricia Carcasses	Portland	OR
Camille Cardinale	Los Angeles	CA
Guy Cargulia		CA
Gaile Carr	Mount Shasta	CA
Bernie Carreon	Canoga Park	CA
Nicole Carson	Calabasas	CA
Lillyan Cendejas	Brea	CA
Heather Cerigioni		CA
Tina Chang		CA
Katrina Child	San Francisco	CA
Ajla Cibra	Los Angeles	CA
K Clarke	lanaster	CA
Michael Clingan	Westlake Village	CA

Morgan Coffey		CA
Damon Colclough	San Diego	CA
Sasha Conlen	University Place	WA
Trina Cooper		WA
Rick Cox		CA
Uma Cox	Brentwood	CA
C Crum		CA
Diane Crummett	Soap Lake	WA
Marc Cutler		WA
Namita Dalal		CA
Colleen Daley	Chula Vista	CA
Tanya De Bruijn		WA
Shatoiya De La Tour	Chimacum	WA
Renee De Vicq	Fullerton	CA
Sheedy Dehdashti		CA
Gail Demirtas	Thousand Oaks	CA
Ellen Dorfman	Olympia	WA
Lynne Doria		ID
George & Phyllis Drummond	brentwood	CA
Sophie Duckett	Saratoga	CA
Eric Dynamic	Oakland	CA
Sally Eastey		WA
Bitia Edwards		CA
Denice Eldridge		CA
Nancy Ellestad	El Cajon	CA
John Elliott	Berkeley	CA
Angie Emery		CA
Sandy Esque		CA
Jamie Falgoust	Shingle Springs	CA
Deborah Fallender		CA
Peter Faure		CA
Melanie Feder		OR
Roger Finney	Vancouver	WA
Mary Foley	el dorado hills	CA
Lorraine Foster		OR
Liz Fowler		CA
Rex Franklyn		CA
Cece Frazier		CA
Sabine Freudiger		CA
Steven Fukuda		CA
G G	orting	WA
K G		WA
Michelle Galo		WA
Erin Garcia		CA
Jamila Garrecht		CA
Michelle Geil		CA
Laurie Geller	Camas	WA
Susan Ghirardelli		CA
Marge Gianelli		CA



Anthony Gilchrist		CA
Mark & Susan Glasser		CA
Sandra Glover		CA
Roz Goldstein		CA
Karen Green		CA
Nina Greenberg		CA
Brigette Greener	San Jose	CA
Miriam Gruver	Ukiah	CA
Gaye Guida-Dennis		WA
Tom H	MARINA DEL REY	CA
Victoria Hall	Burien	WA
Linda Hale	Sequim	WA
Joseph Hardin		CA
John Harris	Pittsburg	CA
Nancy Hartman		CA
Marietta Hayes	Encino	CA
Chris Hazynski		CA
Rachelle Henderson		CA
Gary Hennemuth		CA
Jeremy Henry	Portland	OR
Chris Herman		WA
Diane Hestich		CA
Bruce Hirayama		CA
Bernard Hochendoner	Patterson	CA
Cher Holden		CA
Kyva Holman		CA
Steve Holzberg	Folsom	CA
Marianne Hooper	Pasadena	CA
Jennifer Hudson	Tacoma	WA
Joe Hughes	Willits	CA
Tim Hunovice	Portland	OR
Nicole Hunt		CA
Jeri Ichikawa	Renton	WA
Quinton James	Los Angeles	CA
Darynne Jessler		CA
Frederique Joly		CA
Aaron Jones	Oakland	CA
Jennifer Jones	Monterey	CA
Sandra Joos		OR
J Kantoff	Bainbridge Island	WA
Mike Kappus	San Francisco	CA
Sharla Keith	Aloha	OR
Diana Kekule	florenece	OR
Rachel Kelley		CA
Diana Kliche	Long Beach	CA
Rebecca Koo		CA
Vicki Kopinski	Meniffee	CA
Julie Kramer		CA
Patrick Kruse		CA

Carolyn Kubecka		CA
Susan Kuhn	Portland	OR
Wm Laestadius		WA
William Lawson	calimesa	CA
Thom Laz	Seattle	WA
Nicholas Lenchner		CA
Kate Lewis	Los Angeles	CA
O Lewis	Los Angeles	CA
Frank Leykamm	San Francisco	CA
Wendy Light		OR
Barb Lincoln		CA
Scott Lindsay		CA
Stu Lips	eugene	OR
Joseph Logston	Bellflower	CA
Jacklyn Loughbom	manhattan beach	CA
H M	Pebble Beach	CA
Stan Maeschen		CA
Vicki Maheu	San Diego	CA
Carol Majors	Northridge	CA
Elise Mallove	Topanga	CA
Jesse Marcus		CA
John F Martinez	Los Angeles	CA
Kara Masters	Topanga	CA
Ronald Maxson	Los Angeles	CA
Marita Mayer		CA
Isa Mays	Vancouver	WA
Kristin Mccloy	Oakland	CA
Julian McIntyre	Laguna Beach	CA
Mickey Mccarthy		CA
Michele Mcferran		OR
Clayton Medeiros	Bellingham	WA
Max Mensing	yachats	OR
Michael Meredith		CA
Alison Merkel		CA
Kathy Mesch		CA
Miriam Meyer	Pacific Palisades	CA
Renee Milburn		CA
Annika Miller	Mill Valley	CA
Corinne Miller	El Cajon	CA
Earl Minkin	northridge	CA
Melissa Miranda		CA
Ronnie Mitchell	Bellingham	WA
Madelaine Moir	Sequim	WA
Lorraine Murphy	sacramento	CA
Alexis Negele	Santa Monica	CA
Jan Nelson	Eugene	OR
Pam Nelson		CA
Amir Niknam		CA
Lozz Of The Family Kay		WA

Sufi Olsen		OR	
K Olson		CA	
L Osborn		OR	
James Page		CA	
Nick Page	Ferndale	WA	
Rochelle Palermo	Alhambra	CA	
John Pasqua	Valley Center	CA	<i>The oceans need to remain well stocked.</i>
Susan Pelican	Woodland	CA	
Anne Perkins	Santa Monica	CA	
E Perkins		CA	
Jerry Persky	Santa Monica	CA	
Mike Pfeffer		CA	
Laureen Picciani	fort bragg	CA	
David Pinzon	Culver City	CA	
Jayne Pitchford		CA	
Pam Plummer		CA	
Jeannie Pollak	Oxnard	CA	
Jeri Pollock	Altadena	CA	
Debra Poscharscky	Portland	OR	
Paula Pruner		CA	
Leslie Rabb	West Hollywood	CA	
Maria Ramirez		CA	
Sidney Ramsden Scott		CA	
Colene Rauh		CA	
Dale Riehart		CA	
Nancy Riggleman	Tollhouse	CA	
Margaret Rivera	Fair Oaks	CA	
James Roberts	Sugarloaf	CA	
Les Roberts		CA	
Marci Robinson	Pocatello	ID	
David Detweiler and Molly Robinson		WA	
Christian Rocklein	Paradise	CA	
Constance Rodman	Seattle	WA	
Mary Rojeski		CA	<i>IF THE OTHER CREATURES IN THE SEA DON'T EAT NEITHER DO WE!!!</i>
Rob Rondanini	Roseville	CA	
Ralph Roug		CA	
Linda Rudin	Daly City	CA	
Susan Rudnicki	Manhattan Beach	CA	
Teresa Rutherford	San Diego	CA	
Barb S	Woodinville	WA	
Jeanne S		CA	
C S		CA	
John S.		CA	
Nancie Sailor	Los Altos	CA	
Gloria Sall	Dana Point	CA	
Ron & Marya Santi		WA	
Michael Sarabia		CA	
Gustaf Sarkkinen		ID	
Ray Saturno	El Cerrito	CA	

Roberta Schepps		CA
Sandra Schomberg	Corvallis	OR
Susan Schwarz	Nevada City	CA
Joan Scott	Arcadia	CA
Chris Seaton		CA
Jo Sebern		CA
Yoko Senesac	Torrance	CA
Barbara Shapiro	Santa Monica	CA
Virginia Sharkey		CA
L Sherwood		WA
Marc Silverman		CA
Zoe Simon		CA
Denise Simone	bellevue	ID
Anita Simons		CA
Barb Siray-Nieto	Mukilteo	WA
Audrey Smith	Corona	CA
Baker Smith	Burien	WA
Mollie Smith		WA
Carol Soto		CA
Margaret Spak		CA
Leslie Spoon	Los Osos	CA
Christina Spooner	Albany	OR
Dan Stabel	Aberdeen	WA
L Stayton	sherman oaks	CA
Barry Stelling	Sonoma	CA
Tonya Stiffler	Shoreline	WA
Kelly Stone	Ashland	OR
Jana Strang	shelley	ID
Cheri Streimikes		WA
Mary Sullivan	Aptos	CA
Marya Suzanne Shapiro	Port Townsend	WA
Julie Svendsen		CA
Pauline Taini	Pacifica	CA
Geraldine Teitelbaum	Garberville	CA
Susan Telese	Los Angeles	CA
Kim Thatcher		CA
Kat Thomas	Seattle	WA
Ann Thompson		CA
Jami Tolpin		CA
Jessica Torres		CA
Karen Toyohara	La Mesa	CA
Aiting Tung	Newbury Park	CA
Mathias Van Thiel	Hayward	CA
Chris Van Hook		CA
Enrico Verga	Seal Beach	CA
Sonia Vila		CA
Joe & Mary Volpe		CA
Michael Von Sacher-Masoch	Everett	WA
Elizabeth Walker	Vacaville	CA

*This is a no brainer. I am a ocean fishermen and do not eat farmed seafood*

Victoria Wallace	Dulzura	CA
Violet Wallach		CA
Amy Walter	Seattle	WA
Nathan Walworth		CA
Carolyn Watkinson	Atwater	CA
Robert Weinstock		CA
Dean Weiss	Topanga	CA
Philip Welanko	Vallejo	CA
Clyde Weston	Descanso	CA
Heather Wilber		CA
Bernie Williams		CA
Cassie Wilson	Spokane	WA
Samantha Wilson		CA
Betty Winholtz		CA
Joie Winnick	Sherman Oaks	CA
Elaine Wohl	Fresno	CA
Patricia Wolfram	Seattle	WA
Don Woods	San Francisco	CA
Tom Wyman		CA
Sheila Wyse		CA
Allan Y	Novato	CA
Susan Yamagata		CA
Katherine Yeboah		CA
Lorraine Yee	San Francisco	CA
Carl Yoshida		OR
Eric Zakin	San Mateo	CA
Katrina Zaleski	Corona	CA
Stephanie Ziemer		CA
Marguery Lee Zucker		OR
E Zuniga		CA

David Bitts  
*President*  
Larry Collins  
*Vice-President*  
Duncan MacLean  
*Secretary*  
Mike Stiller  
*Treasurer*

## PACIFIC COAST FEDERATION of FISHERMEN'S ASSOCIATIONS



W.F. "Zeke" Grader, Jr.  
*Executive Director*  
Glen H. Spain  
*Northwest Regional Director*  
Vivian Helliwell  
*Watershed Conservation Director*  
***In Memoriam:***  
Nathaniel S. Bingham  
Harold C. Christensen

### Please Respond to:

#### ☐ California Office

P.O. Box 29370  
San Francisco, CA 94129-0370  
Tel: (415) 561-5080  
Fax: (415) 561-5464

[www.pcffa.org](http://www.pcffa.org)

12 June 2013

#### ☐ Northwest Office

P.O. Box 11170  
Eugene, OR 97440-3370  
Tel: (541) 689-2000  
Fax: (541) 689-2500

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

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and Council Members:

The Pacific Coast Federation of Fishermen's Associations (PCFFA) represents working men and women in the U.S. West Coast commercial fishing fleet. PCFFA appreciates the council's adoption of a Fishery Ecosystem Plan with a priority to protect low-trophic-level species that aren't currently fished or managed. The plan represents progress in the effort to better manage fishery resources, recognizing predator-prey relationships and the role of habitat and climate affecting stock abundance.

In furthering the progress the council has made to date in its Fishery Ecosystem Plan, PCFFA encourages the council to now consider deslisting two species currently on its List of Authorized Fisheries and Gear. These species – Pacific saury and shortbelled rockfish – currently support no fishing activity, however they are important forage stocks for commercially valuable fish stocks such as albacore tuna and Pacific salmon.

Indeed, Pacific saury and shortbelled rockfish are the types of unmanaged forage fish the ecosystem plan intends to protect. The council has identified saury as an important component in the diet of several highly migratory species, including species such as tuna. Although a small West Coast saury fishery was prosecuted following the collapse of the California sardine fishery in the 1950s, there hasn't been an attempt to target saury directly in more than 40 years. Shortbelled rockfish are an important forage fish for Pacific salmon, together with krill, anchovy, sardine and herring, and salmon, off California anyway, have been gorging on shortbellies during the early part of the 2013 season.

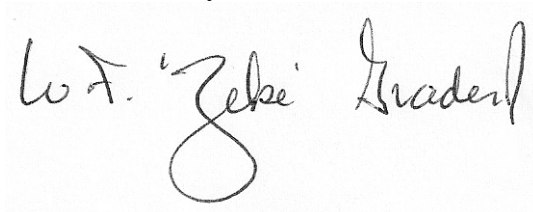
Pacific Fishery Management Council  
12 June 2103  
Page Two

Frankly neither of these two species belong on the List of Authorized Fisheries. No one is actively fishing them, nor should they until the council can evaluate the effect on the wider ecosystem and existing fisheries targeting their predators.

As we noted in our letter prior to the council's adoptions of its first Fishery Ecosystem Plan, the council has consistently expressed consensus over its desire not to allow new fisheries targeting forage species until it can assess the impact to the rest of the marine food web. That's why we continue to believe it's important for unmanaged forage species such as saury, sandlance and various kinds of smelts to be incorporated into appropriate Fishery Management Plans. Until then, the council should immediately revise its List of Authorized Fisheries so that you don't unwittingly allow an unregulated fishery targeting Pacific saury or open the door for fishing on shortbellied rockfish.

Your attention to this matter is appreciated. If you or staff have any questions or require further information, please do not hesitate to contact us.

Sincerely,

A handwritten signature in black ink that reads "W.F. 'Zeke' Grader, Jr." The signature is written in a cursive style with a large, stylized loop for the letter 'Z'.

W.F. "Zeke" Grader, Jr.  
Executive Director





11 June 2013

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

RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear

Dear Chairman Wolford and Council Members,

All of us at West Marine appreciate the Council's work to date in adopting a Fishery Ecosystem Plan (FEP) that will improve the management of our fisheries by bringing ecosystem science and considerations into the decision making process. We urge the Council to continue taking action at the upcoming June meeting in Garden Grove, CA by beginning implementation of the ecosystem-based initiative to protect unmanaged forage fish. In particular, we ask that you provide basic protections for a crucial forage species: Pacific saury, an important source of sustenance for migratory species such as sharks, marlin, and tuna.

Pacific saury, which are currently on the list of pre-approved fisheries, is a prime example of updates required in light of the council's unanimous decision to adopt an ecosystem plan that prioritizes protection of unmanaged forage fish. With the increased pressure on our marine ecosystems, it is the Council's responsibility to manage our fisheries in a way that considers the broader ecosystem in order to ensure long-term sustainability. Protecting the ocean food web through the conservation of prey fish is a pillar of ecosystem-based management, which is why it is of utmost importance to update the current Federal List of Authorized Fisheries and Gear.

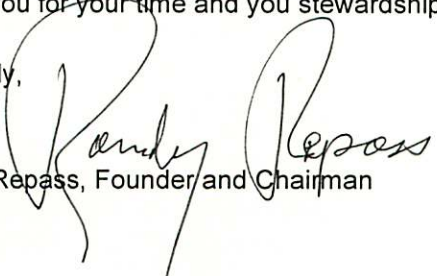
If saury remains on a pre-approved list there is nothing to prevent new fisheries that target this important prey fish with no restrictions and no consideration about the effect on predators. When it comes to forage fish, the last thing we need is an unregulated high-volume fishery to serve as a new source of chicken feed or bait shipped overseas.

We at West Marine consider sustainably managed fisheries to be crucial for our bottom line. Providing for the long-term health of our ocean and land based ecosystems ensures that people will be fishing off the West Coast for generations to come, and that means good business for the marine industry and all the derivative economic benefits that help drive coastal economies. Healthy populations of forage fish help make this possible. Therefore, once notification requirements are put in place for Pacific saury, the Council should move on to establish long-term protection by incorporating currently unmanaged forage fish into appropriate fishing management plans beginning in September.

Adequate conservation of forage fish is critical to the long term abundance of the Pacific marine ecosystem - and the fishermen, coastal communities and businesses that depend on it.

Thank you for your time and your stewardship of our oceans.

Sincerely,

  
Randy Repass, Founder and Chairman





June 12, 2013

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

RE: Agenda item H.1., updating the federal list of authorized fisheries and gear

Dear Chairman Wolford,

On behalf of the undersigned organizations and businesses representing over 60,000 members, we are writing to support your intent to revise and update the Council's List of Authorized Fisheries and Gear (List). We strongly request that the purse seine fishery for Pacific saury be removed from the List. We also request that the Council agendaize for its next meeting an FMP amendment process in order to implement the Council's June 2012 adopted management objective of prohibiting new fisheries on unmanaged forage species pending an accounting of ecosystem impacts,<sup>1</sup> and, Initiative #1 of the newly adopted Fishery Ecosystem Plan.<sup>2</sup>

Seabirds are important to our home state of California and to our organizations. California has invested over \$82 million in the last 25 years on restoring seabird colonies in the U.S. and

northwest Mexico, through oil spill settlement funds.<sup>3</sup> Birdwatching and other wildlife watching generates over seven billion dollars a year for the state.<sup>4</sup>

Audubon California has been focusing on forage fish conservation at the state federal level for several years. Sea & Sage Audubon Society is the primary Orange County chapter of the National Audubon Society, with over 3,000 members. For nine years Sea & Sage has contributed leadership and volunteers to monitor the colony of California Least Terns at the nesting preserve at Huntington State Beach. Our chapter is very interested in anything that would impact the availability of forage fish for the Least Tern or other bird species, as well as marine mammals and other animals for whom the forage fish are a natural food source. We also organize pelagic birding trips in southern California, supporting this ecotourism industry. Shearwater Journeys is a business that has been running pelagic trips in northern and central California for over 30 years, and we are deeply concerned about the conservation of the forage base in the California Current.

### **The importance of Pacific saury to marine birds in the California Current and in California**

Pacific saury is a critical prey item for both visiting and locally breeding California Current seabirds. Its importance to seabirds varies by species, availability in a given year, and availability of other types of prey. For example, saury is shown to be an important or critical component of the diets of glaucous-winged gulls, western gulls, rhinoceros auklets, tufted puffins, Xantus's murrelet, sooty shearwater, streaked shearwater, Buller's shearwater and Laysan albatross.<sup>5,6,7,8,9,10,11,12</sup>

In addition to the importance of saury as an individual prey species, it is also important to protect a wide variety of prey species for seabirds and other marine wildlife. Seabirds are the most threatened group of marine animals - 30% of species face some threat of extinction.<sup>13,14</sup> Food availability is a growing conservation issue for the over 150 breeding and visiting seabird species in the California Current System (CCS). Climate change is making the CCS less predictable, and is affecting the timing and availability of food for California's seabirds. Juvenile rockfish and other mid-trophic level fish are decreasing in abundance, ocean acidification is increasing,<sup>15</sup> and primary productivity and zooplankton biomass have declined.<sup>16</sup> Sardines and anchovy in southern California have been scarce since 2008 and 2010, respectively<sup>17</sup>. In 2012, federally endangered California Least Terns, which favor anchovy for provisioning their young, relied more heavily on saury.<sup>18</sup>

### **The importance of removing Pacific saury from the list of authorized fisheries and gear**

There is reason to be concerned about a fishery for Pacific saury developing in the U.S. EEZ. It is a popular food fish in Japan and Korea with global landings between 200,000-600,000 tons/year.<sup>19</sup> Currently, the List includes a pre-authorized commercial purse seine fishery for our U.S. EEZ. This means that a purse seine fishery could open at any time, without notification to the government or Council and without catch limits or other regulations. This is deeply worrisome to us and to others who care about seabirds and marine wildlife, for aesthetic and economic reasons. By removing saury from the List, saury and its dependent marine predators will provide an interim level of protection until legally binding regulations can be put into place.

**Broader protection of unmanaged forage species through implementation of Initiative #1 in Appendix A of the Fishery Ecosystem Plan**

In order to implement the Council's June 2012 motion on unmanaged forage species, the FEP states that:

*... 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.<sup>20</sup>*

We request the Council follow an action to remove saury from the List, with an intent to initiate FMP amendments to implement the June 2012 forage objective.

We thank the Council for its attention to this important matter.

Sincerely,



Anna Weinstein  
Audubon California

Deborah Shearwater  
Shearwater Journeys

Susan Sheakley  
G. Victor Leipzig, PhD  
Sea and Sage Audubon (Orange County, CA)

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<sup>1</sup> PFMC. June 2102. Supplemental Revised Council Action on Consideration of Further Protection of Currently Unmanaged Forage Species. Agenda Item G.1.d.

<sup>2</sup> PFMC. April 2013. Pacific Coast Fishery Ecosystem Plan, Appendix A.

<sup>3</sup> S. Hampton, Chief Analyst, OSPR. Personal communication. 2013.

<sup>4</sup> U.S. Fish and Wildlife Service. 2008. Wildlife Watching in the U.S: The Economic Impacts on National and State Economies in 2006. Washington, D.C.

<sup>5</sup> Vermeer, K. 1982. Comparison of the Diet of the Glaucous-Winged Gull on the East and West Coasts of Vancouver Island. The Murrelet, Vol. 63, No. 3

<sup>6</sup> Vermeer, K.. 1979. Nesting requirements, food and breeding distribution of rhinoceros auklets and tufted puffins. Ardea. 67.

<sup>7</sup> Thayer, J. et al. 2007. Forage fish of the Pacific Rim as revealed by diet of a piscivorous seabird: synchrony and relationships with sea surface temperature. Can J Fish Aquat. Sci. 65: 1610-1622.

<sup>8</sup> Schrimpf, M. et al. 2012. Trade-offs in prey quality and quantity revealed through the behavioral compensation of breeding seabirds. Mar. Ecol. Prog. Ser. Vol 460 247-250.

<sup>9</sup> Hunt, G. and J. Butler. 1980. Reproductive ecology of western gulls and Xantus's murrelets with respect to food resources in the southern California bight. CalCOFI Rpt. Vol. XXI

<sup>10</sup> Hamilton, C. et al 2004. Diet of Xantus's murrelets in the southern California bight. The Wilson Bulletin. Vol. 116 No. 2.

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- <sup>11</sup> Gould, P. et al. 2011. Trophic relationships of albatrosses associated with squid and large-mesh drift-net fisheries in the North Pacific Ocean. *Cam J. Zool.* Vol 75.
- <sup>12</sup> Gould, P. et al. 2000. Foods, trophic relationships, and migration of sooty and short-tailed shearwaters associated with squid and large-mesh driftnet fisheries in the north Pacific Ocean. *Waterbirds* 23(2):165-186.
- <sup>13</sup> IUCN 2010. Red List. [http://www.iucn.org/about/work/programmes/species/red\\_list/](http://www.iucn.org/about/work/programmes/species/red_list/)
- <sup>14</sup> Newton, K., D. Croll, H. Nevins, Scott R. Benson, J. Harvey, B.. Tershy. 2009. At-sea mortality of seabirds based on beachcast and offshore surveys. *Marine Ecology Progress Series* Vol. 392: 295–305, 2009
- <sup>15</sup> Feely, R., V. Fabry and J. Guinotte. Ocean acidification of the North Pacific Ocean.
- <sup>16</sup> Sydeman, W.J., K. Mills, J. Santora, S.A. Thompson. 2009. Seabirds and climate in the California Current – a synthesis of change. *CalCOFI Rep* Vol. 50. 2009.
- <sup>17</sup> Bjorkstedt, E. et al. 2012. State of the California Current Ecosystem 2011-2012. CalCOFI rpt. Volume 53. [http://calcofi.org/publications/calcofireports/v53/Vol\\_53\\_StateofCurrents\\_41-76.pdf](http://calcofi.org/publications/calcofireports/v53/Vol_53_StateofCurrents_41-76.pdf)
- <sup>18</sup> Marshalek, D. 2013. California Least Tern Monitoring report 2012. California Department of Fish and Wildlife.
- <sup>19</sup> FAO. 2010. Species Fact Sheet: *Cololabis saira*, <http://www.foa.org/fishery/species/3001/en>
- <sup>20</sup> PPMC. April 2013. Pacific Coast Fishery Ecosystem Plan, Appendix A.



Get Inspired!  
6192 Santa Rita  
Garden Grove, CA 92845

6-6-13

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

**RE: Agenda Item H.1., Updating the Federal List of Authorized Fisheries and Gear**

Dear Chairman Wolford and Council Members,

I am a marine biologist who has been working to restore coastal kelp forests for the last 11 years. My efforts have helped to reforest the Coast of Orange County, CA. I am writing to encourage you to protect forage fishes such as the Pacific Saury. Taking an ecosystem approach to conservation is absolutely crucial to protecting the vast seas on our planet.

I work in the ocean, underwater. I get to see the fish that are born each year and see the young of the year migrate through my kelp forests. In January, I can observe the plankton booms, upwelling, and the numbers of juvenile fishes and forecast the offshore fishing each year. Forage fish are an indicator for the rest of the food chain. They must be monitored and protected. If saury remains on a pre-approved list there is nothing to prevent new fisheries that target this important prey fish with no restrictions and no consideration about the effect on predators. In fact, a new fishery can begin without so much as a heads-up to the council. I encourage the council to put in place a "notification requirement" and to establish management tools for forage fishes.

Thank you for considering my comments and for protecting our fisheries.

Sincerely,

Nancy L. Caruso

Marine Biologist/Founder

Get Inspired

[www.getinspiredinc.org](http://www.getinspiredinc.org)

Carol Mitchell  
President Stonefly Maidens Fly Fishing Club  
3058 NW Valle Vista Terrace  
Portland, OR 97210

June 8, 2013

Pacific Fishery Management Council

Dear Sirs:

First of all, the Stonefly Maidens want to thank you for adopting the first Pacific Fishery Ecosystem Plan and we applaud the Council for moving toward an ecosystem-based management approach in the California current.

We feel that now is the time to move forward to implement the first priority: protecting unmanaged forage species. The membership supports an Ad hoc committee being formed as soon as possible to start this important work!

It is our understanding that the Council is currently updating and revising the "List of Allowable Fisheries and Gear". We would like to recommend that the process include the commercial seine fishery for Pacific saury- i.e. that they be removed from this List. The door to an unregulated harvest of this ecologically critical species is not acceptable since it would have such a potentially negative impact to the marine ecosystem off the West Coast.

As fisherwomen, we are acutely aware of how not being good stewards today will have an effect beyond our lifetimes, our children's and theirs. We look to organizations, such as yourselves, to be forward thinking and to look at the BIG picture.

Thank you

Sincerely,

Carol Mitchell, President

----- Forwarded message -----

From: **Glen Anderson** <[glen@olywa.net](mailto:glen@olywa.net)>

Date: Sat, Jun 8, 2013 at 7:46 AM

Subject: We need SUSTAINABLE fisheries. Do NOT overfish Saury.

To: [pmmc.comments@noaa.gov](mailto:pmmc.comments@noaa.gov)

Jun 8, 2013

Pacific Fisheries Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, OR 97220

Dear Management Council,

Your Fishery Ecosystem Plan is a good start toward what we need.

Everything in the ocean is inter-connected. Sustainable fisheries require recognizing this.

THE NEXT STEP is to remove Pacific saury from the list of authorized fisheries. Saury is an important FORAGE FISH for many highly migratory species of sharks and tuna, SO WE MUST PROTECT SAURY FROM OVERFISHING in order to promote sustainability for the species that eat it..

PLEASE REVISE THE LIST OF PRE-AUTHORIZED FISHERIES to make sure you study things, including the consequences, before opening a new fishery.

REMOVE SAURY FROM THE PREAPPROVED LIST. This will prevent overfishing this important prey fish.

Once you've removed saury from the preapproved list, the council should proceed to establish long-term protections by bringing saury and other currently unmanaged forage fish into appropriate management plans beginning in September. Taking this next step will enable the council to prevent unregulated fishing on important prey species.

Thank you for your continued commitment to a productive marine environment.

Sincerely,

Glen Anderson

WA 98503



June 11, 2013

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

**RE: Exclude Unmanaged Forage Species from Revised List of Authorized Fisheries**

Dear Chairman Wolford,

Wild Oceans supports the Council's April decision to separate updating the List of Authorized Fisheries and Gear<sup>1</sup> (List) from Fishery Ecosystem Plan (FEP) Initiative 1, protection for unmanaged forage species. **As the Council moves forward revising the List at the June meeting, we urge you to ensure that work under Initiative 1 is not obstructed by the inclusion of unmanaged and unfished forage species on that list.**

As we previously stated in public testimony, the List of Fisheries approach to protecting unmanaged species from new fisheries is reactive rather than proactive. At best, a prohibition on a newly proposed fishery would last only one year under the MSA's highly discretionary emergency action provision,<sup>2</sup> requiring the Council to scramble to amend an FMP in order to prevent the fishery from developing. The Initiative 1 ad-hoc committee will rightly explore more robust means of conserving unmanaged forage fish through the Council's FMP authority.

In June of last year, the Council clarified its intent regarding unmanaged forage fish:

*"...to recognize the importance of forage fish to the marine ecosystem off our coast, and to provide adequate protection for forage fish. We declare that our approach is to prohibit the development of new directed fisheries on forage species that are not currently managed by our Council, the States or the Endangered Species Act (ESA), until we have an adequate opportunity to assess the science relating to the fishery and any potential impacts to our existing fisheries and communities."*

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<sup>1</sup> 50 CFR 600.725(v).

<sup>2</sup> MSA § 305 (c).

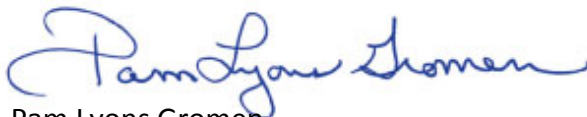


Consistent with the Council's declared intent, no unfished or unmanaged species should be included in the List of Authorized Fisheries. However, the February 2013 draft of the List includes Pacific saury,<sup>3</sup> a species that is not managed under either a federal or state fishery management plan and for which no west coast fishery currently exists. No explanation is provided for why the Ecosystem Plan Development Team chose to add Pacific saury to the List, although the same experts note that management is nonexistent and that saury is "presumably a potential large-scale target."<sup>4</sup> **Indeed, species with potential for large commercial harvests are exactly the ones FEP Initiative 1 is intended to protect.**

The FEP Initiative 1 ad-hoc committee is the most appropriate forum to vet the list of forage species requiring protection and to propose the means to protect them. Actions taken by the Council before this expert committee is formed must not negate the important work the committee will soon undertake.

Thank you for your consideration.

Sincerely,



Pam Lyons Gromen  
Executive Director

---

<sup>3</sup> PFMC. February 2013. Pacific Coast Fishery Ecosystem Plan. Public Review Draft of Ecosystem Initiatives Appendix. Table A.1, p. A-6.

<sup>4</sup> Ibid, Table A.2, p. A-11.



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

**Re: Remove Pacific saury from the List of Authorized Fisheries  
and Gear**

Dear Chairman Wolford and Council Members:

I write today on behalf of the National Wildlife Federation's over four million members and supporters, and 48 state and territorial affiliated organizations to thank you for unanimously adopting the Pacific Fishery Ecosystem Plan and to urge you to remove Pacific saury from the revised List of Authorized Fisheries. With the adoption of the ecosystem plan, the Council committed to implement protections for currently unexploited forage fish. Allowing a pre-approved fishery for Pacific saury would not align with this goal, especially with their importance as a food source for highly migratory species like albacore tuna and sharks.

The NWF seeks balanced, common-sense solutions to environmental problems that work for wildlife and people. We agree with the Council's decision to make implementing protections for unmanaged forage fish the first priority under your ecosystem plan because they are linked to so many strands of the ocean's food web. Forage fish sustain marine mammals, seabirds and commercially and recreationally valuable fish like salmon, tuna and cod. For such an ecologically important tier of the food web, the last thing we need is an unregulated high-volume fishery to serve as a new source of chicken feed or bait shipped overseas.

Unfortunately, right now there is nothing to prevent a new fishery from starting at any time with no restrictions and no consideration about how it affects the rest of the food web. The Council can begin to change this dynamic when it meets this June in Garden Grove. By updating the List of Authorized Fisheries, decision managers will give themselves a

chance to ask important questions before a fishery begins rather than after. Once you've put in place a notification requirement, we urge you to continue working to establish long-term protection for prey species by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

Thank you for the opportunity to comment on this important issue.

Sincerely,

Nicholas Callero ><(((<sup>o</sup>>  
National Wildlife Federation  
Regional Outreach Coordinator  
C: 503.977.5467 O: 206.577.1415

# **The Northwest Guides and Anglers Association**

*To protect, enhance, and promote healthy sportfisheries and the ecosystems they depend on in the Pacific Northwest.*

May 28, 2013

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

Re: Pacific Saury protection

Dear Chairman Wolford and Council Members:

The NW Guides and Anglers Association is made up of over 30 guides and charters also representing thousands of sport anglers that participate in NW sportfishing. Our mission is to protect, enhance and promote healthy sportfisheries and the ecosystems they depend on in the Pacific Northwest. It is for this reason that we are writing to you urging that the council take a forward-looking approach to management of non-managed forage species such as Saury.

It wasn't that many years ago that krill received protection through a progressive action of the Oregon Department of Fish and Wildlife commission. The commission took action banning the take of this critical forage specie as demand was growing and interests were looming to take advantage of this resource for private profit. The commission saw fit to protect krill from commercial harvest so as to not compromise the base of the food chain that feeds so many other sport and commercial species important to our economy and healthy food sources.

Saury now faces the same pressures. As overseas populations dwindle, outside sources continue to eye species such as the Saury to fill their insatiable needs. The NW Guides and Anglers Association urges the council to consider protection of the Saury and other key baitfish species that are critical to our tuna, salmon, steelhead, bottomfish, halibut and a multitude of other species. As stocks around the globe continue to decline, demand for our nation's ocean resources will continue to soar. Ex-vessel values will climb for all species linked to this and other baitfish resources. It makes good sense to protect these species now before it is too late.

Thank you for considering this important action.

Bob Rees, President  
NW Guides and Anglers Association



## Port Orford Ocean Resource Team

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May 26, 2013

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

Dear Chairman Wolford and Council Members:

I am writing to thank the Council for adopting a Fishery Ecosystem Plan last month and starting to shift management of our West Coast fisheries toward an ecosystem-based approach. I encourage you to avoid undermining this important milestone by pre-authorizing a fishery targeting Pacific saury, an important food source for commercially valuable species such as albacore tuna.

Saury and other forage species are the key link in a productive marine food web that supports the coastal fishing and tourism economy in Port Orford, meaning these species have real economic value when left in water. An abundance of forage fish helps support our ocean ecosystem and maintain the marine environment we all care about. Our fishermen recently launched a Community Supported Fishery, allowing people from around the state to share in supporting our local fishermen and our sustainable fishing model. We call on the Council to help support our fisheries and the community that depends on healthy stocks of tuna, lingcod, rockfish and salmon.

If saury remains on a pre-approved list there is nothing to prevent new fisheries that target this important prey fish with no restrictions and no consideration about the effect on predators. This would be especially discouraging in light of the council's adoption of an ecosystem plan that prioritizes protection of unmanaged forage fish. We encourage the Council to revise your current list of fisheries so that you provide yourself a chance to ask important questions before a new fishery begins rather than after. Once the Council updates the list of authorized fisheries, you should begin work on establishing long-term protection for these



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species by incorporating currently unmanaged forage fish into appropriate fishery management plans beginning in September.

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. Thank you for considering my comments and for your continued commitment to a productive marine environment. We look forward to engaging in this process as the Council moves forward on its Ecosystem Initiative.

Sincerely,

A handwritten signature in black ink that reads "Leesa Cobb".

Leesa Cobb  
Executive Director



Agenda Item H.1.c  
Jennifer Gilden - NOAA Affiliate <jennifer.gilden@noaa.gov>  
Supplemental Public Comment 3

June 2013

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## Fwd: H.1 - Congressional Research Service response to questions regarding List of Fisheries

10 messages

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**Mike Burner** <mike.burner@noaa.gov>  
To: Jennifer Gilden <jennifer.gilden@noaa.gov>

Fri, Jun 21, 2013 at 3:42 PM

Begin forwarded message:

**From:** Steve Marx <SMarx@pewtrusts.org>  
**Date:** June 21, 2013, 2:32:45 PM PDT  
**To:** "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>  
**Cc:** "mike.burner@noaa.gov" <mike.burner@noaa.gov>  
**Subject:** H.1 - Congressional Research Service response to questions regarding List of Fisheries

Hi Mike and others,

Marci Yaremko requested that I submit the attached document for the record, under agenda item H.1. We submitted two questions to the Congressional Research Service regarding the item C from the Council's motion on forage fish from June 2012 (Agenda Item G.1.d, also attached). The document attached here includes the questions submitted and the response we received from the Congressional Research Service.

Thanks very much,

Steve

**Steve Marx**

Senior Associate, US Oceans, Pacific

Pew Charitable Trusts p: 503-230-1333 (main) 503-914-9012 (cell)

e: [smarx@pewtrusts.org](mailto:smarx@pewtrusts.org) | [www.pewenvironment.org](http://www.pewenvironment.org)

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### 2 attachments



**CRS response re List of Fisheries.pdf**  
180K



**June 2012 Forage Motion.pdf**  
76K

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**Jennifer Gilden - NOAA Affiliate** <jennifer.gilden@noaa.gov>  
To: Chuck Tracy - NOAA Affiliate <Chuck.Tracy@noaa.gov>

Fri, Jun 21, 2013 at 4:19 PM

Chuck, what do you think is the best way to deal with these? Label them as supplemental attachments?

It is the Council's intent to recognize the importance of forage fish to the marine ecosystem off our coast, and to provide adequate protection for forage fish. We declare that our objective is to prohibit the development of new directed fisheries on forage species that are not currently managed by our Council, or the States, until we have an adequate opportunity to assess the science relating to the fishery and any potential impacts to our existing fisheries and communities.

The Council directs the Ecosystem Plan Development Team (EPDT) to proceed with Option 2 as detailed in Agenda Item G.1.b, EPDT Report, and schedule a progress report on its work to update and revise the List of Fisheries (LOF), to be made to the Council as soon as possible after completion of the fishery ecosystem plan (FEP). The Council further directs that:

- A. Regarding the LOF, all Council advisory bodies shall be tasked with identifying 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. This exercise shall be completed by the advisory bodies and provided to the EPDT as soon as possible after completion of the FEP.
- B. For state-managed fisheries, the states shall be responsible, through their EPDT representatives, for preparing the list of state-managed fisheries which have a nexus with Federal waters, for inclusion in the updated List.
- C. The EPDT's progress report shall include any analysis on the possible effectiveness of the LOF application process in meeting the goal of preventing development of non-existent fisheries.
- D. The report shall also include, to the extent possible, any new information or analysis regarding the application of Section 600.747 of the Federal rules, including whether there is a possibility of amending these regulations for the West Coast such that additional requirements and specifications regarding the Council's review of applications could be formally incorporated into Federal regulations.
- E. Regarding the Council's standards which would be used in assessing whether a proposed new fishery could compromise conservation and management measures within the West Coast EEZ, the EPDT progress report shall provide full detail of the proposed standards and process, in order to make the procedural and content requirements clear and transparent to both applicants and the public, consistent with the recommendations outlined in Option 2 of the EPDT Report.
- F. As soon as possible after completion of the FEP and upon receipt of the Progress Report, the Council shall review and provide guidance so that the standards (for assessing new fisheries) can be finalized for incorporation into the FEP.

After completion of the FEP, the Council will proceed to incorporate any needed protections into our current suite of Fishery Management Plans through an amendment process.



## **Congressional Research Service (CRS) Response Regarding Federal List of Fisheries**

### Questions Submitted to CRS

- 1) The provisions at 50 CFR 600.725(v) describe and implement the notification requirement referred to in Section 305(a) of the Act. Could the agency (NMFS) change the provisions at 50 CFR 600.725(v) so that more than just notification and a 90 day waiting period were required for a new fishery? For example, could the provisions be changed so that a prospective fishermen would have to submit notification and wait until receiving explicit approval before fishing, rather than just have to wait 90 days? Or conversely, would changing this provision not be possible because it may conflict with section 305 (a) of the Act?
- 2) Can the “List of Fisheries” described in section 305(a) of the act be used to “reverse the burden of proof” on how new fisheries are developed. Currently, it is our understanding that if someone wants to try to catch and sell something that isn’t currently being managed or fished, they may do so without any regulation until the agency decides that it wants to manage it. We are trying to figure out if the regulations around this “List of Fisheries” can be tweaked – absent an act of congress – to say that someone has to provide notification and then wait until they get approval before fishing an unmanaged fish.

### Response from CRS

These questions basically address the same issue, which is: can the provision governing the 90 day waiting period and approval be changed by agency action, or must the legislation be amended by an act of Congress? Three CRS analysts (one who deals with fisheries management, one who deals with legislative and legal issues, and one who specializes in administrative law issues) examined this issue independently and all agreed that the legislative intent of this provision seems to indicate that this provision must be changed by legislative action (i.e. an act of Congress), and cannot be changed by agency rulemaking. This issue is not clearly spelled out in the statute, and the issue has not been addressed by any court, so it isn’t entirely clear that legislative action is necessary. But, all CRS analysts agree that it appears very likely that the legislative intent was that this provision could only be changed through legislation, and not by agency action.