

# ENDANGERED HABITATS LEAGUE

DEDICATED TO ECOSYSTEM PROTECTION AND SUSTAINABLE LAND USE

EHL

February 19, 2015

Ms. Dorothy M. Lowman, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

**RE: E.4 Unmanaged Forage Fish Protection Final Action**

Dear Chair Lowman and Council Members:

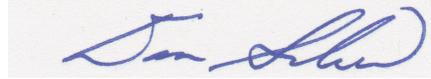
I am writing on behalf of the Endangered Habitats League (EHL), a non-profit organization dedicated to ecosystem protection and sustainable land use. Because EHL is Southern California's only regional conservation group, we feel a heightened responsibility to protect and preserve our local ecosystems. Through science-based initiatives, we try our best to reconcile human and environmental coexistence. EHL collaborates with various stakeholders to strike a balance between nature preservation and sustainable development, which allows Southern Californian communities - human, animal and plant alike - to prosper and grow. Home to some of the most famed beach cities, Southern California has a deep connection to the Pacific Ocean. We at EHL understand the importance of maintaining a healthy marine ecosystem and protecting all of its inhabitants.

At its upcoming March meeting, we strongly support the Council's final action to protect currently unmanaged forage fish. The Council has already made great strides toward establishing regulatory protections, and we applaud its persistent efforts to incorporate ecosystem principles into fishery management decisions. Southern California waters are teeming with life, all of which is involved in a complicated food web. Each species, from the largest whale to the smallest plankton, is important for maintaining a healthy marine ecosystem. Predator species, like tuna, dolphins and seabirds, depend on forage fish for sustenance, and will likely suffer if their prey is overexploited. By adopting a final preferred alternative that designates forage fish as an ecosystem component species and prohibits new directed fisheries without robust prior review, the Council can help ensure the future livelihood of an entire ecosystem. While it is critical to protect threatened and endangered species, it is equally as important to protect their source of life.

Establishing basic, precautionary management for forage fish is vital in the transition to ecosystem-based fishery management. In doing so, the Council will fulfill the first initiative of its visionary Fishery Ecosystem Plan, which gained unanimous approval in 2013. We are excited that the Council has an opportunity to compound upon the goals of EHL, and hope that it will continue to take progressive action toward ocean conservation.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Yours truly,

A handwritten signature in blue ink, appearing to read "Dan Silver", is displayed on a light gray rectangular background.

Dan Silver  
Executive Director



Ms. Dorothy M. Lowman, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

**RE: Agenda Item E.4 Unmanaged Forage Fish Protection Final Action**

Dear Chair Lowman and Council Members:

As the owners and chefs of Border Grill restaurants, we pride ourselves in creating authentic Mexican dishes that showcase fresh and sustainable ingredients. We try our best to provide customers with an epicurean, but also educational experience, in the hopes of garnering greater support for environmental protection. No matter the Border Grill location, our produce and meats come from local farmers and ranchers, and we only serve sustainable seafood. The culinary arts would be nothing if not for the bounty that comes from land and sea, and it is our collective responsibility to ensure that future chefs have equal, if not greater, opportunity for culinary creativity.

At its upcoming March meeting, we strongly support the Council's final action to protect currently unmanaged forage fish. The Council has already made great strides toward establishing regulatory protections, and we applaud its persistent efforts to incorporate ecosystem principles into fishery management decisions. Many restaurants owners and patrons are aware of the worldwide effort to cut back on selling and eating seafood that is unsustainably caught or raised. Larger fish, like tuna and swordfish, tend to receive greatest public advocacy, but the fish they feed upon are equally as important. Although fish like saury and sand lance are not as highly coveted, adopting a final preferred alternative that designates forage fish as ecosystem component species and prohibits new directed fisheries without robust prior review would ensure comprehensive preservation of marine food webs. The Council has the opportunity to provide meaningful protections for these important little fish while helping to ensure that predator species, such as salmon, tuna, whales and seabirds, also have enough sustenance to thrive.

Establishing basic, precautionary management for forage fish is an important step in the transition to ecosystem-based fishery management. In doing so, the Council will fulfill the first initiative of its visionary Fishery Ecosystem Plan, which gained unanimous approval in 2013. It is only possible to preserve or experiment with the nuances of Mexican cuisine when chefs have indefinite access to quality ingredients. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem that will support sustainable fisheries for decades to come.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,  
Mary Sue Milliken  
Chef/Owner



OREGON SHORES  
CONSERVATION COALITION

Dear Chair Lowman and Council Members:

The Oregon Shores Conservation Coalition strongly supports final action by the Council to protect currently unmanaged forage fish.

Adopting the preferred alternative that designates these fish as an ecosystem component and prohibits directed fisheries without a full review will take a major step toward protecting the marine food web. Making sure that any fishery on these species is sustainable is critical for the health of our oceanic ecosystems.

Oregon Shores salutes the Council for taking this potential problem seriously and moving thoughtfully toward establishing regulatory protection for these species. We urge the Council to take the next step at its March meeting and adopt these protections. This will be a step in the direction of the ecosystem-based management that we support, and will help to fulfill the Council's Fishery Ecosystem Plan.

Thank you for considering these views, and for your diligent work in analyzing and considering policies designed for comprehensive management of all components of marine ecosystems.

Sincerely,

Phillip Johnson, Executive Director



Dear Chair Lowman and Council Members:

As a chef and owner of a restaurant, I have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; our business applauds the Council for its work to incorporate ecosystem principles into fishery management decisions. This is very important to the health of the ocean ecosystem, and thus to the livelihood of my business and community.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries my customers, community and my kitchen rely upon.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,

Greg Higgins, Chef and Owner  
Higgins Restaurant



## Oregon Chapter

RE: Unmanaged Forage Fish Initiative

February 23, 2015

Dear Chair Lowman and Council Members,

The American Cetacean Society was the world's first cetacean protection organization. ACS' mission is to protect whales, dolphins, porpoises, and their habitats through public education, research grants, and conservation actions. We understand the importance of marine health to many ecosystems. In encouraging others to learn about and watch marine mammals, we know that a healthy ocean is vital. Forage fish serve an important role as essential diet for many of the marine animals we love to watch, learn about, and advocate for.

We have been following and engaging in the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; we applaud the Council for its work to incorporate ecosystem principles into fishery management decisions.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem which we fight for daily.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,  
Joy Primrose  
ACS Oregon Chapter President  
[marine\\_lover4ever@yahoo.com](mailto:marine_lover4ever@yahoo.com) (541) 517-8754



7 Devils Brewing Co.  
Annie Pollard  
247 S 2<sup>nd</sup> St  
Coos Bay, OR 97420

RE: Unmanaged Forage Fish Initiative

Dear Chair Lowman and Council Members,

7 Devils Brewing company is a local brewery in Coos Bay with local ingredients. We aim to be a sustainable business that is socially, ethically and environmentally responsible. Being part of the Oregon coastal community, we understand how our economy depends on a strong and healthy ocean. Forage fish conservation is important to us, as many of the local seafood species we serve depend on these valuable species for their diet.

I also have a master's degree in marine ecology and a background working in fisheries management. I have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species: I applaud the Council for its work to incorporate ecosystem principles into fishery management decisions. This is very important to the health of the ocean ecosystem, and thus to the livelihood of many in my community.

At its March meeting, I support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

The Council's preliminary preferred alternative incorporates unmanaged forage fish as ecosystem component species into each of its existing fishery management plans; prohibits new directed fisheries without rigorous review and management measures being in place beforehand; and allows a limited amount of these species to be caught in existing fisheries. Finalizing this alternative will ensure that unregulated directed fisheries for these forage species do not develop and that existing fisheries are not negatively impacted.

Thank you for your continued commitment to maintain a healthy and productive Pacific Ocean.

Sincerely,  
Annie Pollard  
Co-owner, 7 Devils Brewing Co.  
Coos Bay, OR



RE: Unmanaged Forage Fish Initiative

February 24, 2015

Dear Chair Lowman and Council Members,

Mother's has grown over the years from a small 90-seat restaurant to a Portland institution. Chosen Restaurant of the Year by Portland's *Willamette Week*, Best Comfort Food, Best Brunch, and Best Lunch Spot by *Citysearch* and *Portland Monthly*, and one of America's Top Restaurant Bargains by *Food and Wine Magazine*, Mother's Bistro & Bar is a destination spot for anyone who comes to downtown Portland. The menu features food with global influence but sourced on the bounty of the northwest; fish & shellfish, small game, and produce with seasonality. We aim to be a sustainable business that is socially, ethically and environmentally responsible. In serving local, sustainable seafood, I see how much of our economies and environment depend on a strong and healthy ocean. Forage fish conservation is important to us, as our much of the local seafood we serve depend on these valuable species as their main diet.

We have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; our business applauds the Council for its work to incorporate ecosystem principles into fishery management decisions. This is very important to the health of the ocean ecosystem, and thus to the livelihood of my business and community.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries my customers, community and my kitchen rely upon.

Thank you for your continued commitment to maintain a healthy and productive Pacific Ocean.

Sincerely,

Lisa Schroeder  
Executive Chef/Owner  
Portland, OR

sustainable delectable possible



**BAMBOO**  
SUSHI

PO Box 3347, Portland OR 97208

February 24, 2015

RE: Unmanaged Forage Fish Initiative

Dear Chair Lowman and Council Members,

Bamboo Sushi is the first certified sustainable sushi restaurant in the world. Daily, we are dedicated to bringing our customers the freshest fish, meats, and produce with the greatest consciousness to marine stewardship, sustainability, and the environment. Forage fish conservation is important to us, as many fish depend on these valuable species as their main diet, especially when spending time in the ocean before returning to their native rivers and springs.

We have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; our business applauds the Council for its work to incorporate ecosystem principles into fishery management decisions. This is very important to the health of the ocean ecosystem, and thus to the livelihood of my business and community.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries my customers, community and my kitchen rely upon.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,  
Kristofor Lofgren  
Owner  
Portland, Oregon



February 26, 2015

Chair Dorothy Lowman and Council Members  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Chair Lowman and Council Members:

The Wild Salmon Center's mission is to promote the conservation and sustainable use of wild salmon ecosystems across the Pacific Rim. Because forage fish are a vital component of functioning salmon ecosystems, we have been following the Council's steady progress over the past three years for establishing regulatory protections for currently unmanaged forage fish species. We applaud the Council for its work to incorporate ecosystem principles into fishery management decisions.

We support the Council's upcoming final action to protect currently unmanaged forage fish at the March meeting. By adopting the final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without prior robust review, the Council provides meaningful protections for these important fish - helping to ensure they continue their valuable role as prey for species such as salmon, tuna, whales and seabirds.

The Council's preliminary preferred alternative, selected in September 2014, is an important step toward implementing protections for unmanaged forage fish. It incorporates unmanaged forage fish as ecosystem component species into each of the existing fishery management plans; prohibits new directed fisheries without rigorous review and management measures being in place; and allows for a limited amount of these species to be caught in existing fisheries. Finalizing this alternative will ensure that unregulated directed fisheries for these forage species do not develop and that existing fisheries are not negatively impacted.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013.

INTERNATIONAL HEADQUARTERS

721 NW Ninth Avenue, Suite 300 • Portland, Oregon 97209 USA • tel: 503.222.1804 • fax: 503.222.1805  
info@wildsalmoncenter.org • www.wildsalmoncenter.org

Thank you for your ongoing commitment to understanding and working toward sustainable and productive ocean systems.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Guido Rahr', with a long horizontal stroke extending to the right.

Guido Rahr  
President and CEO



111 SW Columbia Street, Suite 200  
Portland, Oregon 97201  
[pewtrusts.org](http://pewtrusts.org)

February 26, 2015

Dorothy Lowman, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, Suite 101  
Portland, OR 97220

**RE: Agenda Item E.4 - Unmanaged Forage Fish Protection Final Action**

Dear Chair Lowman and Council Members:

We write to express our strong support for the Pacific Fishery Management Council's (Council) ongoing efforts to protect currently unfished and unmanaged forage fish species through the Fishery Ecosystem Plan's (FEP) Ecosystem Initiative 1 (EI-1)<sup>1</sup> and the development of Comprehensive Ecosystem-Based Amendment 1 (CEBA-1).<sup>2</sup> We appreciate the Council's proactive work and steady progress on this issue over the past several years, including the selection of a Preliminary Preferred Alternative (PPA), the Ecosystem Trophic Role pathway, in April 2014,<sup>3</sup> followed by the reaffirmation of that PPA, Alternative 2, in September 2014.<sup>4</sup> At your March 2015 meeting, we request that the Council take final action on this initiative by adopting Alternative 2 as the Final Preferred Alternative (FPA). In selecting this FPA, the Council will fulfill the intent of EI-1 by prohibiting new directed fishing on seven groups of unmanaged forage species absent rigorous prior review, without impacting existing fisheries.

Below, we offer our specific comments on the FPA as well as recommendations on the Council's draft Fishery Management Plan amendments and draft Council Operating Procedure 24<sup>5</sup> (which together will implement CEBA-1), summarized as follows:

- Adopt Alternative 2 as the Council's Final Preferred Alternative to incorporate select forage fish species, as identified in CEBA-1, into all four of the Council's existing Fishery Management Plans (FMPs) as Shared Ecosystem Component (EC) Species, with management measures to prohibit new directed fishing until scientific information has

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<sup>1</sup> See Pacific Fishery Management Council report entitled [Ecosystem Initiative 1: Protecting Unfished and Unmanaged Forage Fish Species of the U.S. Portion of the California Current Large Marine Ecosystem](#), April 2014

<sup>2</sup> Pacific Fishery Management Council, [Comprehensive Ecosystem-Based Amendment 1: Protecting Unfished and Unmanaged Forage Fish Species of the U.S. Portion of the California Current Ecosystem](#), August 2014

<sup>3</sup> Pacific Fishery Management Council, [Decision Summary Document](#) for April 5-10, 2014, page 4

<sup>4</sup> Pacific Fishery Management Council, [Decision Summary Document](#) for September 12-17, 2014, page 4

<sup>5</sup> See Pacific Fishery Management Council, [Comprehensive Ecosystem-Based Amendment 1: Protecting Unfished and Unmanaged Forage Fish Species of the U.S. Portion of the California Current Ecosystem](#), August 2014, page 67. Draft COP 24 (*Protocol for Consideration of Exempted Fishing Permits for Shared Ecosystem Component Species*) is based on CEBA-1's Statement of Purpose and Need and on the Council's PPA, which would allow the development of new fisheries for currently unfished species. Draft COP 24 is "structured similarly to existing COPs associated with FMP fisheries," and "would provide the Council and the public a framework for evaluating the potential impacts of such a fishery to existing fisheries, fishing communities, and the greater marine ecosystem."

been assessed and impacts to existing fisheries, fishing communities and the ecosystem have been fully evaluated.

- Extend the language on incidental catch allowance found in the Coastal Pelagic Species (CPS) FMP draft amendment to the Council's other three FMPs.
- Within the CPS FMP, clarify that jacksmelt are subject to the same management measures of CEBA-1 (prohibition on new directed fishing with incidental retention allowance) as other Shared EC Species.
- Consider limited changes, as described below, to strengthen Draft Council Operating Procedure (COP) 24.
- Continue to work with West Coast states to improve and refine bycatch tracking and reporting protocols to aid in the monitoring of incidental catch over time and ensure that no targeting of Shared EC Species is occurring.
- Conduct a periodic review of the list of species classified as Shared EC Species and afforded protection under this initiative as part of future five-year reviews of the Council's Fishery Ecosystem Plan.

### **Adopt Alternative 2 as the Council's Final Preferred Alternative (FPA)**

Since selecting a Preliminary Preferred Alternative (PPA) at its September 2014 meeting, the Council has taken additional steps to move CEBA-1 forward. Specifically, the Council released revised Draft FMP amendatory language for public review in October 2014 and has just issued an updated draft Environmental Assessment for CEBA-1 as part of the March 2015 Advance Briefing Book. As the Council now prepares to take final action on EI-1 at the March meeting by identifying an FPA, we request that you adopt Alternative 2, which would "amend all four of the Council's FMPs to bring unfished and unmanaged forage species into the Council's FMPs and to prohibit future directed commercial fisheries for those species from developing without scientific information on harvest sustainability and potential ecological effects of the fisheries."<sup>6</sup> In selecting this alternative – which received near-unanimous support at the September 2014 meeting – the Council will complete its important work to advance precautionary and forward-looking protections for currently unfished forage species.

In addition to our support for adopting Alternative 2 as the Council's FPA, we also offer the comments below on the Draft FMP amendatory language and Draft COP 24.

### **Extend the language on incidental catch allowance found in the CPS FMP draft amendment to the Council's other three FMPs**

The CPS FMP draft amendment includes a section entitled "Incidental Catch Allowance for Shared EC Species."<sup>7</sup> In addition to reiterating the prohibition on the targeting of Shared EC Species, this language states that Shared EC Species which are incidentally caught in the CPS fishery may be retained without violating federal regulations. As the PPA selected in September 2014 specifically allows for incidental retention of Shared EC Species across all four FMPs, we

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<sup>6</sup> Pacific Fishery Management Council, [Request for Comments on Draft Fishery Management Plan Amendments Protecting Unfished and Unmanaged Forage Fish Species](#), Cover Letter from Dr. D.O. McIsaac, Executive Director, PFMC, October 2014

<sup>7</sup> Ibid, page 4

recommend that the language in the CPS FMP draft amendment regarding incidental catch (Section 5.1.7) be added to each of the four FMPs. This change will ensure that the incidental retention allowance is explicit in all of the Council’s FMPs while underscoring the Council’s primary intent to prohibit directed fishing on Shared EC Species.

**Within the CPS FMP, ensure that jacksmelt are subject to the same management measures as other Shared EC Species**

In its cover letter accompanying the Draft FMP amendatory language, the Council requested specific input on the CPS FMP’s treatment of jacksmelt, noting that jacksmelt are an existing EC species within the current CPS FMP in addition to being proposed for inclusion on the list of Shared EC Species common to all four FMPs.<sup>8</sup> The Council’s preliminary recommendation is to remove jacksmelt from the existing EC species list in the CPS FMP “in recognition of their inclusion in the Shared EC Species list as a silverside.”<sup>9</sup> Whether or not they are removed from the list of existing EC species within the CPS FMP, our primary concern is that jacksmelt receive the same treatment as other Shared EC Species. To this end, we ask that the CPS FMP amendatory language ensure that jacksmelt are explicitly covered by CEBA-1’s prohibition on directed fishing.

**Consider limited changes to strengthen Draft Council Operating Procedure 24**

Because CEBA-1’s draft FMP amendatory language includes a prohibition on new directed fishing of Shared EC Species until the Council can fully analyze the potential impacts to existing fisheries, fishing communities, and the greater marine ecosystem, any fishing for Shared EC Species would only be allowed on an experimental basis, via an Exempted Fishing Permit (EFP).<sup>10</sup> Draft COP 24, Protocol for Consideration of Exempted Fishing Permits for Shared Ecosystems Component Species, describes the process both for submitting EFP proposals and for the Council’s review of those proposals. We offer these suggested modifications to COP 24:

- In Section A.1 under Submission, we suggest changing “The Council and its advisory bodies should review EFP proposals prior to issuance” to “The Council and its advisory bodies **shall** review EFP proposals prior to issuance...” This will clarify that an EFP can only be issued after full consideration by the Council.
- In Section B.1.c under Proposal Contents, we recommend changing “Council-managed resources” to “Council-managed **and other federally managed** resources” so as to avoid inadvertently excluding resources (such as marine mammals) that are not directly under the Council’s management authority.
- In Section B.2.h under Proposal Contents, we suggest the second clause should note the distinction between authorized catch and take of protected species; this can be accomplished by changing the clause to “this description should include harvest **and take** estimates of overfished and protected species...”

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<sup>8</sup> Pacific Fishery Management Council, [Request for Comments on Draft Fishery Management Plan Amendments Protecting Unfished and Unmanaged Forage Fish Species](#), Cover Letter from Dr. D.O. McIsaac, Executive Director, PFMC, October 2014

<sup>9</sup> Ibid.

<sup>10</sup> Ibid.

- In Section C.3.b.ii under Review and Approval, we recommend striking “other” as it appears in front of “ESA-listed species” in order to clarify that not all of the preceding species are protected under the Endangered Species Act.
- In Section C.5.b under Review and Approval, we suggest adding a fifth item to the list of factors to be evaluated by the Council’s Scientific and Statistical Committee (SSC): “**(5) methodology for determination of potential ecological and economic impacts.**” This will help ensure that the SSC has an opportunity to fully consider whether an EFP’s design will yield information that is specifically relevant to the Purpose and Need of CEBA-1.

Finally, as the Council completes its work on CEBA-1 in March, we offer the following recommendations to help ensure the long-term success and durability of the Unmanaged Forage Fish Initiative.

**Continue to work with West Coast states to improve and refine bycatch tracking and reporting protocols to aid in the monitoring of CEBA-1 over time**

As the Council’s discussion at the September 2014 meeting illustrated, there is strong interest going forward in addressing how best to track and monitor incidental catch of Shared EC Species. However, we understand that existing protocols for monitoring, tracking, and reporting incidental catch are insufficient for capturing relevant data about currently unmanaged forage fish species.

Therefore, in the coming years we suggest that the Council continue to work with fishery managers in California, Oregon, and Washington to improve and enhance these monitoring and tracking protocols so as to develop a more complete understanding of bycatch levels and composition. Some options for future consideration include modest changes to PacFIN<sup>11</sup> data collection and management, use of uniform fish tickets that capture information about Shared EC Species, widespread introduction and use of electronic logbooks, and any simple modifications to fishery dependent at-sea and dockside monitoring that can help improve information on catch and classification of landed Shared EC Species. The resulting data could then be compiled by fishery managers and periodically reviewed by the Council, thereby improving the Council’s ability to both implement CEBA-1 and to document its progress and success. With more robust and reliable monitoring information, the Council will also be able to chart and respond to any notable or sustained increases in bycatch. This in turn will help ensure that the Council is meeting the intent and purpose of EI-1: to prohibit new directed fishing absent rigorous prior review, without constraining existing fisheries.

**Conduct a periodic review of the list of species classified as Shared EC Species and afforded protection under this initiative as part of future five-year reviews of the Council’s Fishery Ecosystem Plan**

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<sup>11</sup> The [Pacific Fisheries Information Network](#) (PacFIN) is a joint federal and state project focused on fisheries data collection and information management; its central database compiles information supplied by state fishery agencies, NMFS, and the U.S. Coast Guard and derived from fish tickets, vessel registration, port sampling, logbook systems, observer data, and other sources.

The Council has carefully considered the question of which species to add to its FMPs under the Unmanaged Forage Fish Initiative, has responded thoughtfully to stakeholder input, and has adopted a comprehensive and complete list based on current information. Nevertheless, the state of ocean science, including food web information, is continually improving. As such, new information about important predator-prey interactions, or fishery interactions, may come to light over time. New species may respond to the effects of climate change through range shifts that bring them into the U.S. West Coast EEZ more often or for the first time, potentially altering food web structure and composition, for instance through the introduction of new forage species.<sup>12</sup>

The Council may wish at some point to expand the suite of forage fish subject to the protections of EI-1. Pew suggests that a process for periodic review of the forage fish in the Shared EC Species category in the Council's FMPs is warranted. We note that the Council has put in place a process for periodic review of its Fishery Ecosystem Plan every five years, with the first review scheduled for 2018.<sup>13</sup> Since the Unmanaged Forage Fish Initiative takes place under the banner of the FEP through the Ecosystem Initiatives process, we suggest that the Council specify that a review of the forage fish species included in the Shared EC Species category be conducted as part of future FEP reviews, with consideration given to adding any new species at that time.

In conclusion, we greatly appreciate the Council's thoughtful, deliberate, and effective work over the past three years to advance EI-1, as well as the Council's overall attention to operationalizing an ecosystem-based approach to fishery management. In our experience, few issues have garnered the kind of broad, diverse, and virtually unanimous support that the Unmanaged Forage Fish Initiative has received. As you know, thousands of citizens and fishery stakeholders have weighed in since 2011 with their support for proactive, precautionary measures to safeguard the Pacific Ocean's food web; the Council's final action in March to protect unmanaged forage fish is a tremendous step forward for the entire West Coast and all who depend on and cherish our marine resources.

Thank you for your commitment to this important initiative, and for your work to ensure sustainable fishing and healthy ocean ecosystems.

Sincerely,



Steve Marx  
Officer, U.S. Oceans  
The Pew Charitable Trusts  
[smarx@pewtrusts.org](mailto:smarx@pewtrusts.org)



Gilly Lyons  
Officer, U.S. Oceans  
The Pew Charitable Trusts  
[glyons@pewtrusts.org](mailto:glyons@pewtrusts.org)

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<sup>12</sup> See Pacific Fishery Management Council, [Pacific Coast Fishery Ecosystem Plan](#), pages 165-166 and Pacific Fishery Management Council, [Ecosystem Initiatives Appendix to the Pacific Coast FEP](#), pages A-22 to A-23

<sup>13</sup> See Pacific Fishery Management Council, [Ecosystem-Based Management: Fishery Ecosystem Plan Schedule](#)

February 26, 2015

Dorothy Lowman, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, Suite 101  
Portland, OR 97220

**RE: Agenda Item E.4 - Unmanaged Forage Fish Protection Final Action**

Dear Chair Lowman and Council Members:

I am as the Policy Director of the MidCoast Watersheds Council (MCWC) writing to express our support for a precautionary conservation strategy for forage fish, and to request that the Pacific Fishery Management Council take final action on the Unmanaged Forage Fish Initiative at your March meeting in Vancouver, Washington.

The MCWC works to understand and improve watershed health on the west slope of the Oregon Coast Range from Cascade Head to Heceta Head, including the watersheds of the Salmon River, Siletz River, Yaquina River, Alsea River Yachats River and over 20 smaller ocean tributaries. We focus particularly on salmon habitat, healthy stream function and complexity, clean water, estuarine function, and the nearshore marine environment. We do so in the context of healthy coastal communities and sustainable resource-based economies. We also engage in conservation policy efforts affecting the ocean environment immediately west of our onshore service area. Our focus here is on state and federal management, and on issues affecting the important linkages between oceanic and terrestrial systems.

We recognize the crucial roles that forage fish play in marine and estuarine systems as food for economically important fishes. We also recognize their role as the primary food of our seabird communities, and their important contribution to other ecosystem components. We favor science-based protective management for the following reasons: 1) Directed fishing of currently unfished forage species could harm high-value fisheries such as salmon, albacore, rockfish, and flatfish. 2) Directed fishing of currently unfished forage species could also complicate recovery of Marbled Murrelet populations, leading to further complications for forest management. 3) Directed fishing of forage fishes could slow the recovery of currently depleted fish stocks, including several rockfish species. 4) Ecosystem-based management needs to be adopted before larger-scale harvest of forage fish is considered. Currently, economics do not support reduction (fish-meal) fisheries in our area, but those economics could change. We also are concerned about the possibility of forage fish harvest to feed offshore pen-based fish farming. Putting precautionary measures in place now makes good sense for the future of the West Coast's marine food web.

We appreciate the steady progress made by the Council to protect and conserve unmanaged forage fish, and we ask that you finalize your important work on this issue at the March meeting by adopting a final preferred alternative that prohibits new directed fishing for these species without rigorous prior review that ensures our ocean food web remains intact.

Thank you for this opportunity to comment.

Sincerely,  
Wayne Hoffman, Policy Director  
MidCoast Watersheds Council



February 27, 2015

Ms. Dorothy M. Lowman, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

**RE: Unmanaged Forage Fish Protection Final Action**

Dear Chair Lowman and Council Members:

I am writing on behalf of Azul, an environmental project focused on creating outlets for Latino leadership on marine and coastal conservation issues, as well as building a broader constituency to support environmental stewardship. I am passionate about preserving coastal waters and have dedicated my career to ensuring that California fisheries are sustainably maintained. In the past, I helped to design a network of marine protected areas along the California coast and before that I started my ocean career in commercial aquaculture operations through out the US and Latin America. Additionally, I served as a member of the California Seafood Advisory Panel and proudly represented Azul's participants and supporters. I believe in the importance of finding timely solutions for environmental concerns, but also in allowing communities to engage in, and enact, those solutions.

After holding positions in different arenas of coastal protection, I understand the careful balance that is required for a healthy marine ecosystem. At its March meeting, I support the Council's final action to protect currently unmanaged forage fish. Maintaining adequate numbers of all species within the marine food web necessitates a creative and holistic approach. By adopting a final preferred alternative that designates forage fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council can help pave the way for ecosystem-based fishery management. Although forage fish are not popularly consumed by humans, their continued exploitation can negatively impact other species, including salmon, tuna, whales and seabirds.

Establishing basic precautionary management for forage fish is an important step in the building a strong platform for sustainable seafood. In doing so, the Council will fulfill the first initiative of its visionary Fishery Ecosystem Plan, which gained unanimous approval in 2013. Providing legal protection for forage fish, as well as generating greater public awareness about their significance, will be crucial for keeping our valuable fisheries sustainable and abundant.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Marce', with a stylized flourish at the end.

Marce Gutiérrez Graudiņš  
Founder / Director,  
AZUL

Hayes Street Grill  
320 Hayes Street  
San Francisco, CA 94102

Ms. Dorothy M. Lowman, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

RE: Agenda Item E.4 Unmanaged Forage Fish Protection Final Action

Dear Chair Lowman and Council Members:

I am writing on behalf of Hayes Street Grill, a fish restaurant located in San Francisco's Civic Center district. We have elevated the idea of a "grill" by striving to use local ingredients and prepare them in a modern style. After our grill chef makes an early morning phone call to the fish man at Monterey Fish, we base our daily menu around the day's available catch. The entire menu is imbued with the freshness and flavor of seasonal produce that I pick up from Ferry Plaza Farmer's Market twice a week. Above all else, we want the pristine quality of the fish, produce, and naturally raised meats to speak for themselves. Thirty-six years of business has only solidified our belief in the importance of sustainable fishing advocacy and the need to maintain a healthy and productive Pacific Ocean.

At its upcoming March meeting, I strongly support the Council's final action to protect currently unmanaged forage fish. The Council has already made great strides toward establishing regulatory protections, and I applaud its persistent efforts to incorporate ecosystem principles into fishery management decisions. Many restaurant owners and patrons are aware of the worldwide effort to cut back on selling and eating seafood that is unsustainably caught or raised. Larger fish, like tuna and swordfish, tend to receive greatest public advocacy, but the fish they feed upon are equally as important. Although fish like saury and sand lance are not as highly coveted, adopting a final preferred alternative that designates forage fish as ecosystem component species and prohibits new directed fisheries without robust prior review would ensure a more thorough preservation of marine food webs. Hayes Street Grill, and other businesses in the area, are only able to share the bounty of the Pacific Coast with eager consumers if all levels of the ecosystem remain healthy. By deciding upon a final preferred alternative, the Council will provide meaningful protections for these important little fish while helping to ensure that predator species, such as salmon, tuna, whales and seabirds, also have enough sustenance to thrive.

Establishing basic, precautionary management for forage fish is an important step in the transition to ecosystem-based fishery management. In doing so, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem for decades to come and allow future generations to partake in the lively food culture of San Francisco.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,

Patricia Unterman  
owner and chef

ann & tony kischner's  
**BRIDGE***water*  
B I S T R O

Dear Chair Lowman and Council Members:

With 28 years as chef and owners of coastal restaurants, we know the importance of marine health on our business and the community. We have been following the Council's steady progress in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; our business applauds the Council for its work to incorporate ecosystem principles into fishery management decisions. This is very important to the health of the ocean ecosystem, and thus to the livelihood of my business and community.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries our kitchen, customers, and community rely upon.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,

Ann & Tony Kischner, Owners  
Astoria, OR



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

February 25, 2014

RE: Unmanaged Forage Fish Initiative

Dear Chair Lowman and Council Members,

Flying Fish Oregon is proud to sell all sustainable seafood at competitive prices and unsurpassed quality. We are a local, family run business and guarantee all of our products. We would never sell anything we wouldn't serve at our own dinner table. In addition to seafood, we also sell local grass fed beef, buffalo, elk, pork, lamb, local chicken, eggs, and many other specialty items.

At its March meeting, I support the Council's final action to protect currently unmanaged forage fish. By adopting the final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries my customers/vendors and community rely upon.

These steps will ensure that the Council achieves its goal of establishing basic protections for unmanaged forage fish. In so doing, the Council will fulfill the first initiative of the Council's Fishery Ecosystem Plan, a visionary document that the Council approved unanimously. By protecting forage fish as a key link in the marine food web, we can maintain a healthy marine ecosystem, including the valuable sustainable fisheries we rely upon.

Thank you for your continued commitment to maintain a healthy and productive Pacific Ocean.

Sincerely,

Lyf Gildersleeve  
Owner/ Operator  
Flying Fish Company



# Association of Northwest Steelheaders

6641 SE Lake Rd. • Milwaukie OR 97222

503-653-4176 • 503-653-8769 (fax)

office@anws.org • www.nwsteelheaders.org

Established 1960

February 25, 2015

Dorothy Lowman, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, #101  
Portland, OR 97220

## **RE: Agenda Item E.4 (Unmanaged Forage Fish Protection FPA)**

As anglers, we greatly appreciate the steady progress made by the Pacific Fishery Management Council over the past three years in laying the groundwork for establishing protections for currently unmanaged forage fish. These forage species contribute significantly to the Pacific Ocean's prey base – and support our treasured salmon and steelhead sport fisheries.

At your March meeting, we support the Council's final action to protect unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without full scientific review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as a vital food source for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes good sense, and we encourage the Council to finalize its forage fish initiative in Vancouver next month. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries we rely upon.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,

Norman E. Ritchie  
Portland, OR

Stan Zorn  
Eugene, OR

James E. Baldwin  
Eugene, OR

Bob Rees  
Bay City, OR

LeRoy Beagley  
Eugene, OR

Mark Weiderhold  
Eugene, OR

Bill Robbins  
Eugene, OR

Susan Deickhoff  
Eugene, OR

Eire Mason  
Eugene, OR

Jack Fosback  
Eugene, OR

Cindy Beard  
Eugene, OR

Paul Sbragia  
Eugene, OR

Gary Lutman  
Eugene, OR

Roger L. Redhead  
Cottage Grove, OR

Ken Johnson  
Eugene, OR

John S. Nagy  
Springfield, OR

Doug Gillette  
Eugene, OR

Brian Kirkpatrick  
Eugene, OR

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Corvallis, OR

Mark E. Jab  
Troutdale, OR

Ray Yelm  
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Brian Voigt  
Albany, OR

Jeff Stoeger  
Portland, OR

David D. Smith  
Gresham, OR

Russ Mendoza  
Albany, OR

Robert Gronlund  
Keizer, OR

Robert Moe  
Clackamas, OR

Ken A. Simms  
Albany, OR

Jodi Higgins  
Portland, OR

Doug Briggs  
Troutdale, OR

Rod Tibel  
Albany, OR

Ruth Anderson  
Fairview, OR

Lounie Thurston  
Fairview, OR

Mel Aims  
Albany, OR

Stu Blanco  
Fairview, OR

Leo Mang  
Troutdale, OR

Bert J. Hoeflich  
Albany, OR

Russ Sumida  
Gresham, OR

Doug Miller  
Portland, OR

Paul Dilbertis  
Albany, OR

Bill Kirtpatrick  
Portland, OR

Jon Hillalpendo  
Troutdale, OR

William Bayless  
Albany, OR

Brian T. Heath  
Portland, OR

John Boughton  
Troutdale, OR

Jim Vehic  
Albany, OR

Brian Tarilton  
Happy Valley, OR

Terri Boughton  
Troutdale, OR

Jay May  
Albany, OR

Albert Tarkey  
Tigard, OR

Tim Hiessen  
Portland, OR

Brad Green  
Albany, OR

B. Rey  
Beaverton, OR

Rick Pare  
Canby, OR

Larry Palmer  
Portland, OR

Brad Halverson  
Hillsboro, OR

Michael Myrick  
Portland, OR

Lee L. Van Spreybrock  
Troutdale, OR

Buzz Wilcox  
Oregon City, OR

Jeff Kirkman  
Canby, OR

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Forbestown, CA

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Puyallup, WA

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Sandy, OR

Pat Traff  
Portland, OR

Jamey Marsh  
Troutdale, OR

Robert Gibbs  
Portland, OR

Gregg Robinson  
Vancouver, WA

Jeff Acree  
Irvine, CA

Howard Berg  
Gresham, OR

Josh Windhaus  
Salem, OR

Randy Pierce  
Portland, OR

D. Tarsh  
Portland, OR

Tobi Stark  
Sherwood, OR

Scott Atkinson  
Amboy, WA

W. R. Beith  
Portland, OR

Judy Munroe  
Milwaukie, OR

Gary Geis  
Battleground, WA

Steve Rothenbucher  
Portland, OR

Paul Wiseman  
Portland, OR

Brad Staples  
Clackamas, OR

Jim Hathco  
Portland, OR

Jeffrey Alan Barrett, Jr.  
Sandy, OR

Ted Fountain  
Portland, OR

Jeff Boughton  
Fairview, OR

Victor Diaz  
Vancouver, WA

Paul Shively  
Portland, OR

E. Neiwert  
Gresham, OR

Jeffrey Roecker  
Portland, OR

Bob Levings  
LaQuinta, CA

Tim Daily  
Portland, OR

Sierra Bellinger  
Clackamas, OR

Bear Perkins  
Ridgefield, WA

Waco Fishing  
Tillamook, OR

Mark Collett  
Raymond, WA

Paul Allen  
Bend, OR

Donny Hyde  
Washougal, Washington

Paul Breniser  
Oak Harbor, WA

Hal Michael  
Olympia, WA

Steve Gustafson  
Albany

David Dalan  
Walla Walla, WA

William DeAvilla  
Anchorage, AK

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Travis Unruh  
Moore, ID

John Helmut  
Seaside, OR

Isaac Rodriguez  
North Bend, OR

Tristan Giordmaina  
Missassauga, Canada

John Weber  
Vancouver, WA

Paul Walker  
Eugene, OR

Kevin Carl Robinson  
Portland, OR

Larry McClintock  
Portland, OR

Jason Bare  
Portland, OR

LeRoy Schultz  
Hillsboro, OR

Lee VanSpeybrock  
Troutdale, OR

Miles Stickler  
Olympia, WA

Gary Early  
Brookings, OR

Lynn Whitesell  
Yelm, WA

Joshua Stramiello  
Portland, OR

Chris Tompkins  
Shoreline, WA

Michael Enevoldsen  
Milwaukie, OR

Ron Engelgaue  
Milwaukie, OR

Abraham Wise  
Cloverdale, CA

Rennie Ferris  
Newport, OR

Ron Ritchie  
Saltansea City, CA

Bill Adams  
Seal Rock, OR

Steve Lacey  
Salem, OR

Mark Hutchinson  
Aloha, OR

Bruce Utter  
Vancouver, WA

Thomas Cronin  
Keizer, OR

Earl Nichols  
Portland, OR

David Dalan  
Walla Walla, WA

Travis Unruh  
Moore, ID

Karl Grimes  
Eugene, OR

Eric Bigler  
Waldport, OR

Works at Hi-Mark  
Concrete, Inc.

Rod Fosback  
Eugene, OR

Eric Neiwert  
Troutdale, OR

Sally Kirkpatrick  
Portland, OR

Mark Smith  
Eugene, OR

Jason D Miller  
Springfield, OR

Milton Freewater  
Newton, CN

Wes Edwards  
Eugene, OR

Jeff Darby  
Salem, OR

Jeffrey Bates  
Logsdon, OR

Jim Martin  
Eugene, OR

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Kati Kirkman  
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Roger Obershaw  
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Mike Richey  
Salem, OR

Nona Bowling  
Portland, OR

Phil Murphy  
Salem, OR

Bill Sanderson  
Mill City, OR

Marjorie Bowling  
Portland, OR

Octario Basceoin  
Salem, OR

Paige Morehouse  
Salem, OR

Travis Daly  
Portland, OR

Dan Mitt  
Salem, OR

Danoll Morehouse  
Salem, OR

Derek Hatting  
Gresham, OR

Rick Hong  
Monmouth, OR

Thomas J. Croner  
Keizer, OR

Bob Nelson  
Gresham, OR

Grace Hong  
Monmouth, OR

James Johnston  
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Niko A. Andronikos  
Fairview, OR

Carole Dayton  
Silverton, OR

Arden Cory  
Mill City, OR

Craig Nicholas  
Keizer, OR

Mary Ann Olson  
Salem, OR

Jim A. Kitzhaber  
Gate, OR

Judy O'Neill  
Keizer, OR

Robert D. Lersk  
Stayton, OR

Bob Johnston  
Mill City, OR

Todd W. Nicholas  
Salem, OR

Dale\ Stunbuck  
Portland, OR

David Simpson  
Salem, OR

Austin Jones  
Salem, OR

John Fery  
Salem, OR

Mike Waltman  
Puyallup, WA

Hugh W. Hannon  
Keizer, OR

Elizabeth Fery  
Salem, OR

Cecil Taylor  
Puyallup, WA

Elizabeth Bunting  
Salem, OR

Robert Morton  
Keizer, OR

Gene Myers  
Puyallup, WA

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Vancouver, WA

Adam Linder  
Vancouver, WA

Ed Heuss  
Bremerton, WA

Warren Wannamaker  
Vancouver, WA

Jamie Birkland  
Vancouver, WA

Christina Pines  
Renton, WA

Jeff Arrowsmith  
Vancouver, WA

Mary D. Odom  
Vancouver, WA

Sarah Teal  
Puyallup, WA

Scott Atkinson  
Vancouver, WA

R. Ortegon  
Vancouver, WA

Mark Forman  
Puyallup, WA

Bill Jennings  
Vancouver, WA

Doug Majury  
Vancouver, WA

Edward Sausdee  
Norland, WA

John Kuhn  
Vancouver, WA

Jennifer Giles  
Vancouver, WA

Steve Sprague  
Pendleton, OR

Anita Hindberg  
Vancouver, WA

Clay Rolan  
Vancouver, WA

Greg Robison  
Starbuck, WA

Buddy Hindberg  
Vancouver, WA

Jerry Lee  
Vancouver, WA

John Johnson  
Vancouver, WA

Aunelian P. Doudreaux  
Vancouver, WA

Don Street  
Vancouver, WA

Weston Corszynski  
Vancouver, WA

Terry Walters  
Vancouver, WA

Todd Worlein  
Vancouver, WA

Lori Santos  
Vancouver, WA

Julia Chamberlain  
Vancouver, WA

Gregory Glass  
Vancouver, WA

Kori York  
Vancouver, WA

Dave Elliott  
Vancouver, WA

Katy Benson  
Vancouver, WA

Keith Hyde  
Vancouver, WA

Donald Greer  
Vancouver, WA

Cody Gray  
Vancouver, WA

Richard Essex  
Vancouver, WA

Curt Fleiscaman  
Vancouver, WA

Ben Meyer  
Vancouver, WA

Devin Wannamaker  
Vancouver, WA

Greg Linder  
Vancouver, WA

Karyn Carterdy  
Vancouver, WA

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Jeff Hernandez  
Portland, OR

Olivia Muller  
Portland, OR

Neal H. James  
Springfield, OR

Alyssa Lonsbiky  
Portland, OR

Annette Rogers  
Portland, OR

George Ridlon  
Milwaukie, OR

Nathan Bohlmann  
Hillsboro, OR

Ted Teufel  
Tillamook, OR

Tom VanderPlaat  
Forest Grove, OR

Venn Lyter  
Salem, OR

Steve Daniels  
Portland, OR

Jeff Gibson  
La Center, WA

Autumn Skye Nugent  
Hillsboro, OR

Tresa Pate  
La Center, WA

David Pate  
La Center, WA

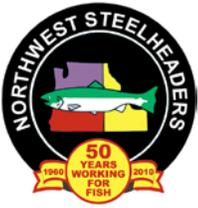
Tammy Pender  
La Center, WA

Jen Nugent  
Hillsboro, OR

Kanyon Hellaire  
Vancouver, WA

Jen W. Thefys  
Portland, OR

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## Association of Northwest Steelheaders

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Signatures without  
Addresses:

Jack Salmon

Aidan Vlasaty

Dave Patterson

Jason Degroot

Dave Cartner

Tom Louie

Nick Lowry

Matthew Todd

Tyler Hicks

Steve Gustafson

Brad Collins

Joshua Rainey

Maurice Gordon

Joseph Hutton

Justin Wesson



March 1, 2015

Dorothy Lowman, Chair  
Pacific Fishery Management Council 1100 NE Ambassador Place, Suite 101  
Portland, OR 97220

**RE: Agenda Item E.4 - Unmanaged Forage Fish Protection Final Action**

Dear Chair Lowman and Council Members:

On behalf of our members, Audubon California is writing in strong support of the Council's ongoing efforts to protect currently unfished and unmanaged forage fish species through the Fishery Ecosystem Plan's (FEP) Ecosystem Initiative 1 and the development of Comprehensive Ecosystem-Based Amendment 1.

In September 2014 the Council confirmed its preliminary preferred alternative (#2) to amend all four of the Council's FMPs "to bring unmanaged forage species into the FMPs and to prohibit future directed commercial fisheries for those species from developing without scientific information on harvest sustainability and potential ecological effects of fisheries."

The list of species being considered for protection - developed through the hard work on the part of the Ecosystem Work Group and other advisory bodies - are critical prey for numerous Council managed species as well as a diverse array of other marine wildlife. We appreciate that the process to develop the list of species under consideration for final action by the Council- round and thread herring, Pacific sandlance, Pacific saury, Silversides, Osmerid smelts and Pelagic squid (other than Humboldt squid) included the thoughtful response on the part of the Council to substantial public input.

We ask that you continue your excellent work on this initiative by taking final action to adopt Alternative 2, which will fulfill the intent of Ecosystem Initiative 1 by prohibiting new directed fishing on seven groups of unmanaged forage species absent rigorous prior review, without impacting existing fisheries.

In sum, we concur with the recommendation made by Pew Trusts in their letter to the Council dated February 26, 2015, that the Council:

- Adopt Alternative 2 as the Council's Final Preferred Alternative to incorporate the list of unmanaged forage species into all four of the Council's existing FMPs as Shared Ecosystem Component Species, with management measures to prohibit new directed fishing until scientific information has been assessed and impacts to existing fisheries, fishing communities and the ecosystem have been fully evaluated.
- Extend the language on incidental catch allowance found in the Coastal Pelagic Species FMP draft amendment to the Council's other three FMPs.
- Within the CPS FMP, clarify that jacksmelt are subject to the same management measures of Comprehensive Ecosystem-Based Amendment 1 (prohibition on new directed fishing with incidental retention allowance) as other Shared EC Species. Retain Pacific herring as an Ecosystem Component Species of the CPS FMP.
- Consider limited changes as described by the Pew Trusts to strengthen Draft Council Operating Procedure (COP) 24.
- Continue to work with West Coast states to improve and refine bycatch tracking and reporting protocols to aid in the monitoring of incidental catch over time and ensure that no targeting of Shared EC Species is occurring.
- Conduct a periodic review of the list of species classified as Shared EC Species and afforded protection under this initiative as part of future five-year reviews of the Council's Fishery Ecosystem Plan. The reason is that marine species may respond to the effects of climate change through range shifts that bring them into the U.S. West Coast EEZ more often or for the first time, potentially altering food web structure and composition, for instance through the introduction of new forage species.

Thank you for your time and attention to ecosystem-based management through Council action at your March 2015 meeting to adopt Comprehensive Ecosystem-Based Amendment 1.

Sincerely,



Anna Weinstein  
Marine Program Director  
Audubon California



February 9, 2015

Dorothy Lowman, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, #101  
Portland, OR 97220

**RE: Agenda Item E.4 (Unmanaged Forage Fish Protection FPA)**

Dear Chair Lowman 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 your work to protect currently unmanaged forage fish, including round and thread herrings, mesopelagic fishes, sand lance, saury, silversides, smelts, and pelagic squids.

NWF seeks balanced, common sense solutions to environmental problems that work for wildlife and people. We agree with the Council's preliminary preferred alternative that incorporates unmanaged forage fish as ecosystem component species into each of its existing fishery management plans thus prohibiting new directed fisheries without review and management measures being in place beforehand while allowing a limited amount of these species to be caught in existing fisheries.

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 animal feed or bait shipped overseas. The Pacific Fishery Management Council should finalize these protections by adopting a final preferred alternative that prohibits new directed fisheries for these forage species without a full analysis. In doing so, the Council will acknowledge the important role these species play in the marine food web and ensure that role is maintained should fisheries for these species be considered in the future.

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

Sincerely,

Les Welsh  
Pacific Region Associate Director  
National Wildlife Federation  
6 Nickerson St., Suite 104  
Seattle, WA 98109  
W: 206-577-7821



March 2, 2015

Ms. Dorothy M. Lowman, Chair  
Pacific Fishery Management Council  
7700 NE Ambassador Place, Suite 101  
Portland, Oregon 97220-1384

Dear Chair Lowman and Council Members,

We applaud the efforts that the Pacific Fishery Management Council has made to protect unmanaged forage fish in recent years. The Environmental Action Committee of West Marin (EAC) is committed to protecting forage fish, as they are a key link in the marine food web. Since 1971, we have worked to protect and enhance the natural environment of West Marin, advocating protection for the region's spectacular bays and marine environment. Our beloved West Marin, renowned for its natural beauty, would be nothing without the health and productivity of the Pacific Ocean.

EAC strongly supports the Council's final action, due in March, to protect currently unmanaged forage fish. A final preferred alternative that designates forage fish as an ecosystem component species will help protect these fish from becoming targets for new commercial fisheries. Because forage fish serve as prey for whales, tuna and other vital species, this designation will help guarantee that the entire ecosystem continues to thrive.

Establishing precautionary measures for forage fish is a logical and important step in the transition toward ecosystem-based management. In doing so, the Council will also fulfill the first initiative of its visionary Fishery Ecosystem Plan, which it unanimously approved in 2013. Protecting forage fish will ensure a sustainable future for marine ecosystems and the coastal communities they support.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely yours,

A handwritten signature in black ink that reads "Amy Trainer". The signature is fluid and cursive, with a long horizontal line extending to the right.

Amy Trainer, JD  
Executive Director



## OREGON CHAPTER SIERRA CLUB

1821 SE ANKENY ST • PORTLAND, OR 97214  
PHONE (503) 238-0442 • FAX (503) 238-6281  
OREGON.CHAPTER@SIERRACLUB.ORG  
WWW.OREGON.SIERRACLUB.ORG

March 2, 2015

Dorothy Lowman, Chair  
Pacific Fishery Management Council  
1100 NE Ambassador Place, Suite 101  
Portland, OR 97220

RE: Agenda Item E.4 - Unmanaged Forage Fish Protection Final Action

Dear Chair Lowman and Council Members:

On behalf of the Oregon Chapter of the Sierra Club and our 20,000 members and supporters in Oregon, I write today to express our strong support for the Pacific Fishery Management Council's (Council) ongoing efforts to protect currently unfished and unmanaged forage fish species. In particular, we thank you for your work to develop Comprehensive Ecosystem-Based Amendment 1 (CEBA-1), and we support the Council taking final action by adopting Alternative 2 at your March 2015 meeting in Vancouver, Washington.

Forage fish play a vital role in the West Coast's marine food web, providing prey for some of our most treasured ocean wildlife such as salmon, tuna, whales, and seabirds. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without rigorous prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as food for other species.

Putting basic, precautionary management in place for forage fish simply makes sense – for our fisheries, our whales and seabirds, and for all of us who depend on a vibrant Pacific Ocean. In establishing these safeguards, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013.

Our members place tremendous value on the Pacific Ocean's vibrant, intact ecosystems – which are in turn made possible by healthy forage fish populations. Thank you for protecting these species as a key link in the marine food web, and for your commitment to a productive and thriving Pacific Ocean.

Sincerely,

Rhett Lawrence  
Conservation Director



February 24, 2015

RE: Unmanaged Forage Fish Initiative

Dear Chair Lowman and Council Members,

Trout Unlimited's mission is to conserve, protect and restore North America's coldwater fisheries and their watersheds. In doing that, we have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; we applaud the Council for its work to incorporate ecosystem principles into fishery management decisions.

The Council should be applauded for its work to protect currently unmanaged forage fish, including round and thread herrings, mesopelagic fishes, sand lance, saury, silversides, smelts, and pelagic squids. The Council's preliminary preferred alternative, selected in September 2014, is a vital step toward implementing protections for unmanaged forage fish.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

The Council's preliminary preferred alternative incorporates unmanaged forage fish as ecosystem component species into each of its existing fishery management plans; prohibits new directed fisheries without rigorous review and management measures being in place beforehand; and allows a limited amount of these species to be caught in existing fisheries. Finalizing this alternative will ensure that unregulated directed fisheries for these forage species do not develop and that existing fisheries are not negatively impacted.

Thank you for your continued commitment to maintain a healthy and productive Pacific Ocean.

Sincerely,

Terry Turner

Trout Unlimited  
Oregon Council Chair

Tom Wolf, Oregon Council TU  
Executive Director



111 SW Columbia Street, Suite 200  
Portland, Oregon 97201  
[pewtrusts.org](http://pewtrusts.org)

March 2, 2015

Dorothy Lowman, Chair  
Pacific Fishery Management Council  
7700 N.E. Ambassador Place, Suite 101  
Portland, OR 97220-1384

**RE: Agenda Item E.4 – Unmanaged Forage Fish Protection Final Action**

Dear Chair Lowman and Members of the Council:

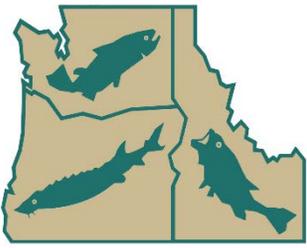
The Pew Charitable Trusts has collected 2,952 comments in support of the Council's final action this March to protect unmanaged forage fish through the adoption of a Final Preferred Alternative that prohibits new directed fishing on seven groups of currently unfished forage species absent robust prior review.

Please include the attached petition as an electronic submission on the web site for the Council's supplemental briefing book. The petition itself is included here, along with the names and cities of individual signers that were gathered as of February 27, 2015. The Council may continue to receive additional comments in the days ahead.

Thank you very much.

Sincerely,

Gilly Lyons  
The Pew Charitable Trusts



**Northwest Sportfishing  
Industry Association**  
PO Box 4, Oregon City, OR 97045

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**Don Swartz**

**Maddy Sheehan, Of Counsel**

February 23, 2015

RE: Unmanaged Forage Fish Initiative

Dear Chair Lowman and Council Members:

The Northwest Sportfishing Industry Association was founded in 1993 by a collection of sport fishing industry business leaders who understood the need for a strong voice in the local, state, regional and federal governments. As an association, we have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; we applaud the Council for its work to incorporate ecosystem principles into fishery management decisions. This approach is very important to the health of the ocean's food-web, and thus to the livelihood of our many sportfishing companies throughout the Northwest and all the jobs and recreation they provide.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other highly valuable sport caught species such as salmon, sturgeon and tuna.

Establishing basic, precautionary management for forage fish makes sense and is an important component of ecosystem-based fishery management. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries our members, their customers, and community rely upon.

Thank you for your ongoing commitment to vibrant and productive Pacific Ocean fisheries.

Sincerely,

Liz Hamilton, Executive Director  
Northwest Sportfishing Industry Association

# Pacific Seabird Group



DEDICATED TO THE STUDY AND CONSERVATION OF PACIFIC SEABIRDS AND THEIR ENVIRONMENT

PSG Website: [www.pacificseabirdgroup.org](http://www.pacificseabirdgroup.org)

**Stanley Senner**  
**Vice-Chair for Conservation**  
Portland, Oregon  
[Conservation@PacificSeabirdGroup.org](mailto:Conservation@PacificSeabirdGroup.org)

2 March 2015

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

## **Agenda Item E.3. Ecosystem – Unmanaged Forage Fish Protection Final Preferred Alternative (FPA)**

Dear Chair Lowman and Council Members:

The Pacific Seabird Group (PSG) appreciates the great strides the Council has made over the past three years toward conserving forage species as food sources for marine life, including seabirds. This letter concerns the Council's meeting on 9 March, at which we request that the Council take final action in protecting unmanaged forage fish by adopting the final preferred alternative (FPA 2), which designates seven groups of currently unmanaged forage species as ecosystem component species and prohibits new commercial fisheries directed at these species without a full analysis.

The PSG is an international, non-profit organization that was founded in 1972 to promote the knowledge, study and conservation of Pacific seabirds. It has a membership drawn from the entire Pacific basin, including Canada, Mexico, Russia, Japan, China, Australia, New Zealand, South Korea, and the U.S. The PSG's members include biologists and other scientists who have research interests in Pacific seabirds, government officials who manage seabird refuges and populations, and representatives of nongovernmental organizations and individuals who are interested in marine conservation.

Millions of seabirds, including at least 25 species during the breeding season and at least an additional 35 species during their non-breeding seasons, inhabit the U.S portion of the California Current Large Marine Ecosystem. Protecting forage fish is critical for many seabirds, including the threatened marbled murrelet, which is a listed species in both the United States

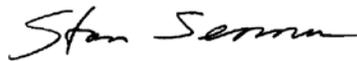
and Canada. Murrelets and other seabird species rely on forage fish, such as Pacific sand lance and osmerid smelt, which are specifically under consideration here. Changes in the abundance, distribution and quality of marine prey have been identified as factors in the decline of marbled murrelets.<sup>1</sup> Pacific sand lance is the most important food for marbled murrelets during the breeding season<sup>2</sup> when the adult seabirds are feeding their hungry chicks.

Seabirds require substantial quantities of prey for survival and reproduction and are extremely sensitive to changes in prey abundance.<sup>3</sup> Adult seabirds may select different species and sizes of prey for their chicks and themselves, thus it is essential to maintain a range of age classes and species to support healthy seabird populations<sup>4</sup>. There is significant evidence from around the world that the collapse of forage fish populations following fisheries exploitation has caused seabird breeding failures and population declines<sup>5</sup>.

Hence, PSG urges the Council to take final action in March to maintain the long-term health of the California Current marine ecosystem and all the benefits we derive from it. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document intended to guide its implementation of ecosystem-based fishery management. Protecting forage fish is a great first step.

Thank you for your continued commitment to maintaining a healthy ocean and sustainable fisheries.

Sincerely,



Stanley Senner  
Vice-Chair for Conservation

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<sup>1</sup> Recovery Implementation Team. 2012. Report on marbled murrelet recovery implementation team meeting and stakeholder workshop. U.S. Fish and Wildlife Service, Lacey, WA.

<sup>2</sup> Nelson, S. K. 1997. Marbled Murrelet (*Brachyramphus marmoratus*), The Birds of North America Online (A. Poole, Ed.). Ithaca: Cornell Lab of Ornithology; Retrieved from the Birds of North America Online: <http://bna.birds.cornell.edu/bna/species/276>. doi:10.2173/bna.276

<sup>3</sup> Cury, P. M. et al. (2011). Global Seabird Response to Forage Fish Depletion – One-Third for the Birds. *Science* 334: 1703-1706

<sup>4</sup> Davoren, G.K. and A.E. Burger. 1999. Differences in prey selection and behaviour during self-feeding and chick provisioning in rhinoceros auklets. *Animal Behaviour*. 58: 853-863.

<sup>5</sup> Piatt, J.F., W.J. Sydeman and F. Wiese. 2007. Seabirds as indicators of marine ecosystems. *Marine Ecology Progress Series* 352:199-204.



Katherine LeSueur  
2930 NE Killingsworth St  
Portland, OR 97211

RE: Unmanaged Forage Fish Initiative

Dear Chair Lowman and Council Members,

Cocotte is my restaurant focused on European style, everyday luxury, and celebrated localism. The menu focuses on the bounty of the northwest; fish & shellfish, small game, and produce with fierce seasonality. We aim to be a sustainable business that is socially, ethically and environmentally responsible. In serving local, sustainable seafood, I see how much of our economies and environment depend on a strong and healthy ocean. Forage fish conservation is important to us, as our much of the local seafood we serve depend on these valuable species as their main diet.

As a chef and owner of a restaurant, I have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; our business applauds the Council for its work to incorporate ecosystem principles into fishery management decisions. This is very important to the health of the ocean ecosystem, and thus to the livelihood of my business and community.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries my customers, community and my kitchen rely upon.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,

A handwritten signature in black ink, appearing to read "Katherine LeSueur", followed by the date "3/2/15".

Katherine LeSueur  
Proprietor/Chef, Cocotte  
Portland, OR



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## **Siuslaw Soil and Water Conservation District**

1775 Laurel Way #4 – Florence, OR 97439 – 541-997-1272 – fax 541-997-6296

E-mail: [Siuswcd@gmail.com](mailto:Siuswcd@gmail.com) Website: [Siuswcd.com](http://Siuswcd.com)

March 2, 2015

Pacific Fisheries Management Council,

The Siuslaw SWCD would like the Pacific Fisheries Management Council to consider ecosystem impacts and to review the best available science before approving new commercial fishing on the seven groups of currently unmanaged forage species. It is widely accepted that forage fish form the base of the ocean food web and are the cornerstone of the Pacific coast's marine ecosystem. We realize that currently there is increased global demand for inexpensive protein but feel that the ecosystem benefits from conserving robust forage fish populations are of more ecological and long-term economic significance and should take precedence. We believe that establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management.

Thank you.

Staff and Directors of the Siuslaw SWCD



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

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## Agenda Item E.4 Ecosystem Unmanaged Forage Fish Protection Final Preferred Alternative

1 message

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**Spencer Miles** <spencermiles@gmail.com>

Mon, Feb 23, 2015 at 10:12 AM

To: pfmc.comments@noaa.gov

Dear Chair Lowman and Council Members,

Thank you for the opportunity to provide comments in support of the Unmanaged Forage Fish Protection Final Preferred Alternative. I greatly appreciate your constructive work to implement the Council's Fishery Ecosystem Plan, and to protect currently unmanaged forage fish as your first initiative. Incorporating forage fish as Ecosystem Component species into the Council's existing Fishery Management Plans makes good conservation sense, and will help ensure a vital food source for salmon, steelhead, and other important marine life is protected into the future.

At your upcoming March meeting in Vancouver, Washington, I respectfully request that the Council finalize these protections by adopting a final preferred alternative that prohibits new directed fisheries for these forage fish absent a full analysis. In doing so, the Council will acknowledge the important role these species play in the marine food web and ensure that role is maintained should fisheries for these species be considered in the future.

The Council's continued work to protect forage fish is important to me, and I support your efforts to safeguard these species. In particular, forage fish are critical to the long-term health of wild salmon and steelhead. Forage fish serve as alternative prey, as schooling marine fish such as sardines, anchovies, herring and smelt provide cover against a gauntlet of predatory seabirds, harbor seals and larger fish that might otherwise devour out-migrating salmon and steelhead smolts. This one point is crucial in determining the proportion of smolts that will return as spawning adult salmon.

Secondly, once in the ocean, as salmon mature, forage fish become a key food source. For example, forage fish account for nearly half the diet composition of Chinook salmon. The extra calories provided by oil-rich forage fish enable salmon to grow larger, produce stronger eggs and improve reproductive success once they return to their natal waters.

I support the Council's final action in March to advance a precautionary approach to management by adopting amendatory language that designates unmanaged forage fish as ecosystem component species, prohibits any new directed fishing on these species without full prior review, and allows for a limited amount of these species to be taken in existing fisheries. Taking these steps will serve to sustain not only forage fish but the millions of salmon, steelhead and other wild marine life that rely on them up the food chain. Thank you for your consideration.

Respectfully,

Sincerely,  
Spencer Miles  
Portland, Oregon  
97202

From: Houston Wong <houston.wong@outlook.com>  
Date: Wed, Feb 18, 2015 at 8:23 PM  
Subject: Supporting Forage Fish Conservation  
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Dear Chair Lowman and Council Members:

As conservationists and members of the coastal communities, we have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; we applaud the Council for its work to incorporate ecosystem principles into fishery management decisions.

At its March meeting, we support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important little fish while helping to ensure enough are left in the water as prey for other species such as salmon, tuna, whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem which we fight for daily.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,  
Houston Wong  
12642 100th Ln NE Apt E121, Kirkland, WA 98034, United States

From: Shelby Atwood <atwoodsh@gmail.com>  
Date: Wed, Feb 25, 2015 at 7:46 PM  
Subject: Unmanaged Forage fish  
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Thank you for your work the past three years in moving toward providing stronger protections for forage fish.

I understand that seabirds, whales and other marine animals depend in forage fish as a critical food source.

I hope you, as a Council, will

- \* protect unmanaged forage fish.
- \* adopt an alternative that will prohibit new fisheries for these species without full analysis.
- and
- \* Establish management for forage fish to transition to ecosystem based fishery management.

Thank you for your hard work in developing these protections.

A concerned citizen of Portland Oregon,  
Shelby Atwood

From: michele dickson <michelendickson@live.com>  
Date: Wed, Feb 25, 2015 at 7:43 PM  
Subject: support Alternative 2 March 9  
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Dear Chair Lowman and Council members,

Thank you for the council's work over the past three years protecting forage fish, which are such an important link in the wildlife food chain.

Please take final action to protect forage fish at the March 9th meeting; please adopt Alternative 2, reflecting the importance of these species in the ecosystem chain.

I appreciate your continued commitment to a healthy ocean ecosystem and sustainable fisheries.

Sincerely,  
Michele Dickson

From: Barry West <bwestphd@gmail.com>  
Date: Thu, Feb 26, 2015 at 7:52 PM  
Subject: Guidelines  
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Please protect the birds who live only with proper historic food supplies. Why would you want this to change? Big dollars?

Barry

From: Lauri Lord <LLord@laklawyers.com>  
Date: Fri, Feb 27, 2015 at 2:36 PM  
Subject: KEEP UP THE GOOD WORK  
To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

Thank you for protecting our precious resources that come from the sea. It's no longer acceptable to have "low bycatch" numbers when it is absolutely possible and profitable to engage in sustainable fishing practices.

Very truly yours,

L. Lord

From: Mark Russell <manruss@gmail.com>  
Date: Mon, Mar 2, 2015 at 8:52 AM  
Subject: Preserving Forage Fish  
To: pfmc.comments@noaa.gov

Dear Chair Lowman and Council Members,

As a concerned citizen, I would like to express my support for the Council to take final action in protecting unmanaged forage fish at the March 9, 2015 meeting by adopting the final preferred alternative (Alternative 2) that designates these species as ecosystem component species and prohibits new directed fisheries for these species without a full analysis. Establishing basic, precautionary management for these critical species makes sense and is an important step in the transition to ecosystem-based fishery management.

Consumers and fisheries will be fine whatever the Council decides to do. Unfortunately, I cannot say the same for the forage fish or the wildlife for whom the fish are a vital component of their food chain. Taking final action in March is the Council's best opportunity to truly make a positive difference in our region's future as it is essential to maintaining the long-term health of our West Coast marine ecosystem and all the benefits we derive from it. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document intended to guide its implementation of ecosystem-based fishery management. Protecting forage fish is a great first step.

Thank you for your continued commitment to maintaining a healthy ocean and sustainable fisheries.

Sincerely,

Mark Russell

From: Jay Withgott <withgott@comcast.net>  
Date: Mon, Mar 2, 2015 at 2:10 PM  
Subject: Please protect forage fish at March meeting  
To: pfmc.comments@noaa.gov

Dear Chair Lowman and members of the Pacific Fishery Management Council,

Thank you very much for your efforts in recent years toward protecting forage fish and pursuing ecosystem-oriented approaches in fisheries management on our Pacific coast. Continuing in these directions is key to maintaining and enhancing the ecological and economic health of our oceans, coasts, and fisheries.

As an author of the best-selling college and high-school textbooks in environmental science, I have been researching and writing about these issues for well over a decade now, and I can

assure you that today's students are excited about prospects for finding ways to help ocean life rebound.

As you know, extensive scientific study shows the crucial role of forage fish in marine ecosystems. Not only do they support populations of larger fish we rely on for food, but they also support populations of seabirds and marine mammals that stabilize ecosystems and bring tourism to our coastal communities. Coastal economies depend on healthy marine ecosystems in all kinds of ways -- I see this myself every time I am on the Oregon coast -- so forage fish management is a clear win-win proposition.

To this end, I request that the PFMC take final action to protect unmanaged forage fish at its upcoming March meeting in Vancouver and adopt the final preferred alternative (Alternative 2). By designating forage fish species as ecosystem component species and prohibiting new directed fisheries without full analysis, this will provide a common-sense and productive step in the transition to true ecosystem-based management for our fisheries. By taking this step, the Council will fulfill the first initiative of its important Fishery Ecosystem Plan, and will help promote the ecological and economic well-being of our waters and coastal communities.

My thanks to everyone on the Council for their years of careful thought and hard work toward sustainable fisheries.

Respectfully,

Jay Withgott

Author, *Environment: The Science behind the Stories, Essential Environment, and Environment: Your World, Your Turn*

Secretary, Audubon Society of Portland

Lifelong observer of seabirds and of intertidal invertebrates

Portland, Oregon

[withgott@comcast.net](mailto:withgott@comcast.net)

From: Tyson, Connie <Tyson.Connie@principal.com>

Date: Mon, Mar 2, 2015 at 3:46 PM

Subject: Unmanaged forage fish

To: "pfmc.comments@noaa.gov" <pfmc.comments@noaa.gov>

We need quick action taken to protect the unmanaged forage fish, so that birds such as puffins at Haystack Rock in Cannon Beach, Oregon, Will have a food source.

Please take action immediately.

Connie Tyson

16940 Greentree Avenue

Lake Oswego, OR 97034

From: Kevin Scribner <scribfish@gmail.com>  
Date: Mon, Mar 2, 2015 at 8:37 PM  
Subject: Forage fish & the Council's Fishery Ecosystem Plan  
To: pfmc.comments@noaa.gov

Dear Chair Lowman and Council Members:

I have been following the Council's steady progress over the past three years in laying the groundwork for establishing regulatory protections for currently unmanaged forage fish species; I applaud the Council for its work to incorporate ecosystem principles into fishery management decisions. This is very important to the health of the ocean ecosystem, and thus to the livelihood of my business and community.

I write you as a former commercial fisherman—1976-1996—and one who has been active in seafood marketing during the past 10 years. The seafood consumer is becoming more and more sophisticated, including awareness of sustainability, traceability, and the fishermen/processor suppliers. I see, then, the stewardship of forage fish species as a key component for both: 1) rigorous ecosystem management that ensures sustainable fisheries; and 2) authentic marketplace sustainability story.

At its March meeting, I support the Council's final action to protect currently unmanaged forage fish. By adopting a final preferred alternative that designates these fish as ecosystem component species and prohibits new directed fisheries without robust prior review, the Council will provide meaningful protections for these important fish while helping to ensure enough are left in the water as prey for such commercially valuable species as salmon and tuna, as well as for many other species in a sustainable ocean ecosystem, such as whales and seabirds.

Establishing basic, precautionary management for forage fish makes sense and is an important step in the transition to ecosystem-based fishery management. In so doing, the Council will fulfill the first initiative of its Fishery Ecosystem Plan, a visionary document that the Council approved unanimously in 2013. By protecting forage fish as a key link in the marine food web, we can maintain a healthy ocean ecosystem, including the valuable and sustainable fisheries my customers/vendors and community rely upon.

Thank you for your ongoing commitment to a vibrant and productive Pacific Ocean.

Sincerely,  
Kevin Scribner  
5916 N. Detroit Ave  
Portland, OR 97217  
509-520-8040