



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

Dear Chairman Wolford and Council Members,

The Coastal Conservation Association Washington (CCA Washington) is a nonprofit organization dedicated to the conservation of marine resources representing more than 6,000 Washingtonians who have a stake in protecting a well-functioning marine food web. Our members have donated thousands of hours working to restore salmon and steelhead to Northwest rivers and streams, all in the hope that we may pass along this natural heritage to our children and grandchildren. We urge the council to do its part to support a healthy ecosystem by protecting forage species in the ocean that aren't currently being managed and to analyze the effects of PFMC managed fisheries on these important prey species in relation to the impacts on salmon populations.

The history of large-scale commercial fishing reveals numerous examples of the overharvest of important targeted and non-targeted stocks, which has negative impacts throughout the marine food web. For example, commercial fisheries extracting massive numbers of forage fish directly impact the health of depleted and ESA-listed stocks dependent on such forage fish. The availability of forage fish to provide a source of food for salmon, other fish, marine birds and marine mammals should take precedence over harvest. CCA Washington supports systematic and vigilant programs of professional catch monitoring and evaluation to identify and correct problems related to bycatch and over harvest of forage fish at an early stage.

Small prey fish are an important food source for salmon and other marine life higher on the food chain. An abundance of forage fish, such as whitebait smelt, also help out-migrating juvenile salmon and steelhead by serving as alternative prey for predatory seabirds, marine mammals and larger fish in estuaries such as the mouth of the Columbia River.

We are concerned about growing worldwide demand to convert vast quantities of forage fish for secondary purposes, such as feed for poultry, livestock and farmed fish. The council noted in its own draft ecosystem plan in November that the incentive for targeting new species of lower-trophic-level fish is likely to grow more attractive due to the spectacular growth of the global aquaculture industry. CCA Washington believes that harvest management should err in favor of conservation and recovery,

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which is why we urge the Council to not only hold off authorizing any new fisheries targeting forage species but to also refrain from expanding any existing forage fish fisheries such as the proposed quota increase for sardines on the west coast until the science is in place to manage both the prey fish and the predator fish that depend on them. As Washington residents, we also note that our state Fish and Wildlife Commission's Forage Fish Management Plan rightly prioritizes the role forage fish play in the ecosystem ahead of its value in the net.

Thank you,

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

Bryan Irwin
Executive Director
CCA Washington

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