



International Game Fish Association

Fishing Hall of Fame & Museum

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June 8, 2012

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

Dear Chairman Wolford and Council Members,

On behalf of the International Game Fish Association (IGFA) and its over 12,000 members in 135 countries, I am writing to request that the Council act immediately to prevent the development of new fisheries on unmanaged forage stocks until their important role as prey for predator species can be taken into account.

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

In order to maintain robust populations of the fish we enjoy catching off the Pacific coast – like tuna, salmon and halibut - measures must be taken to ensure that there is enough prey in the water to sustain and grow these fisheries. The recently released findings of the Lenfest Forage Fish Task Force, a group of thirteen preeminent scientists, made it clear that forage fish are especially important as prey along the Pacific Coast. And because forage fish are easily caught and their abundance is highly variable and unpredictable, their populations are especially vulnerable to collapse. These species are too important to the fragile California Current ecosystem to leave unprotected.

The IGFA applauds the Pacific Fishery Management Council's approach to developing a fishery ecosystem plan. However, we also know that developing such a plan may be a lengthy process. As a result, we urge you to take action now to prevent new fisheries on unmanaged forage fish species through an existing fishery management plan, until it is clear that they can be managed in a manner that takes into account their crucial role in the food web.

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

Sincerely,

Trustee Emeritus

Pamela S. Basco
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Jason Schratwieser
IGFA Conservation Director

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

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June 23, 2012

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

Dear Chairman Wolford and Council Members,

I write today as a fisherman, a biologist, sustainable fisheries advocate and fishmonger to encourage you to prohibit the formation of new fisheries for unmanaged forage species and to establish catch limits on existing forage fisheries.

Beyond being ecologically important, forage species are an economic necessity. Transferring energy throughout the food web from microscopic plankton up to the large predatory fish which support the fishery and seafood industries throughout the Pacific Coast and the United States.

Healthy forage fish populations are a crucial part of the recovery of many fish stocks that are currently overfished or undergoing overfishing. Ecosystem management should also take into account the role of these species as prey.

There is an expanding effort in the fisheries of forage species including anchovies, herring, menhaden, and sardines to fill demand for products including pet foods, aquaculture feed, supplements, and cosmetics. For example, many fish farms are currently utilizing wild forage populations in reduction fisheries to be fed to farmed fish whose wild counterparts are more efficient at converting energy into protein abounding with health benefits for humans. Beyond the food and health benefits to humans these predatory fish are also providing important ecosystem services. The combination of well managed predatory fish stocks with well managed forage fish stocks provides the opportunity to ensure healthy wild fisheries well into the future.

As indicated in the Magnuson-Stevens Act fishery management plans (FMPs) are the only tool to enact conservation and management action. FMPs are not only required to manage fisheries sustainably, but also charged with protecting and enhancing the marine ecosystem. Non-FMP based measures provide insufficient protections for forage fisheries as well as ecosystem protections.

Regulatory authority is needed immediately to protect this crucial link in the productivity of the ocean ecosystem providing our nation with numerous ecological, social, and economic benefits. I urge you to include these unmanaged species in the Coastal Pelagic Species (CPS) Fishery Management Plan to provide adequate management and regulatory authority. I appreciate your effort to protect my livelihood and the health of the oceans through responsible, regulatory based management of forage fish resources.

Sincerely,

A handwritten signature in black ink, appearing to read 'CS' or similar initials, written in a cursive style.

Crystal Sanders
Director & Sustainable Seafood Advisor
Marine & Fisheries Biologist
Fish Revolution
Fishmonger- Royal Hawaiian Seafood

Thomas G. Baty
P.O. Box 534
Inverness CA 94937

June 22, 2012

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

Dear Chairman Wolford and Council Members,

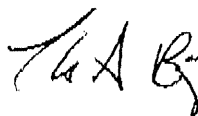
I am a life-long resident of Marin County and have held either sport or commercial fishing licenses my entire life. I have participated in a wide range of fisheries management efforts, from halibut tagging programs to Marine Sanctuary economic evaluations to being a regional stakeholder in the recent MLPA process.

Forage fishes and their fisheries are highly dynamic variables in an extremely complex and only partially-understood oceanic system. Historically, many forage fisheries have been casually and often inadequately managed, particularly in light of limited understanding of abundances, exploitation by marine species, and natural population cycles. As a self-interested constituent, the marine species that I most commonly target---salmon, halibut, albacore, and white sea bass---are all completely dependant on robust forage stocks. Oceanic productivity seems to be such a key variable in our troubled salmon populations, it would seem apparent that fisheries management must take a more nuanced and defensive look at the importance of forage fishes if these species are to have a chance at survival.

California's pacific herring fishery can serve as a clear example of a troubled forage fishery. I actively participated in The Ocean Research Institute's unsuccessful campaign in the 1980s to convince the CDFG to take a more precautionary and conservative approach in managing the San Francisco and Tomales Bay pacific herring fisheries. Our efforts fell on completely deaf ears. In recent years I have watched with resignation as CDFG herring biologists have issued fairly dire warnings about the possibilities of a population collapse of the SF stocks. At the same time (during the MLPA process) we heard the practically nonsensical position by CDFG managers that the Tomales Bay fishery is "well-managed" when the marketable catch has flat-lined at zero for years.

I am of the strong belief that our existing forage fisheries are very much in need of stronger management mechanisms---better understandings of the stocks and fishing effort/take that are driven by more conservative guidance principles than the forces of the market. I think the idea of a moratorium on any new forage fisheries is commendable and worthy of strong support by both fishing interests and environmental advocates.

Sincerely,





www.iloveblueseas.com

415.300.0940
ahoy@iloveblueseas.com

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

Dear Chairman Wolford and Council Members,

I write to you as the co-founder of i love blue sea, a seafood distribution company in San Francisco that provides restaurants, businesses and families with seafood that is certified sustainable. i love blue sea is the only company online to offer seafood tested and certified safe, and was voted "Best Seafood in San Francisco" by 7x7 Magazine in 2011. My business partners, the fishermen we buy from and all of our employees at i love blue sea have staked our livelihoods on a sustainable supply of Pacific seafood. That is why we are asking the Council to prioritize forage fish as the key link in a productive marine food web. Our long-term success, and thousands of jobs, depends on a stable supply of local seafood made possible by a balanced and resilient ocean environment.

Specifically, we ask the Council to take action in June to protect forage species that are not currently being fished. We are concerned that new fisheries targeting forage fish could begin at any time, even before the science is in place to ensure fishing these species does not harm the ecosystem.

Forage fish eat plankton, converting it into life-sustaining protein for everything else in the water, including seabirds, marine mammals, and the bigger fish that people love to catch and eat. Although many of us embrace the traditional use of some West Coast forage stocks for human consumption, any expansion of fisheries targeting forage fish is unlikely to arrive on a dinner plate. Demand is rising across the world to convert forage fish into a commodity that can be fed to livestock, poultry and farmed fish. We are concerned that the market for currently unfinished forage species is likely to grow more attractive due to the spectacular growth of aquaculture, as the Council cited in its own draft ecosystem plan in November.

The Council has a chance to continue the leadership it demonstrated in 2006, when it put krill off-limits because of its importance as forage for other marine life. The Council wisely decided to act before a problem developed. Similarly, the Council should hold off the development of new fisheries on forage stocks unless and until the science is in place to manage them sustainably.

All of us benefit from a marine environment teeming with salmon, albacore tuna and halibut. That's why we are asking the Council to do all it can to safeguard this amazing natural asset, starting by leaving enough prey in the water to sustain a durable and vibrant Pacific ecosystem for generations to come.

Thank you for your ongoing commitment to a healthy ocean and the businesses that depend on it.

Sincerely,

Matt Carreira | Co-founder
www.iloveblueseas.com



www.SF BAY WHALE WATCHING.COM

300 Napa Street, Slip 26 • Sausalito CA 94965 • 415.331.6267

June 8, 2012

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

Dear Chairman Wolford and Council Members,

As the owner of San Francisco Bay Whale Watching, my livelihood and the livelihoods of my employees depend on healthy fish stocks along the Pacific coast. The long-term management of forage species is paramount to the success of people like me who rely on the annual whale migration. New fisheries on unmanaged forage species could seriously disrupt the sensitive balance needed to sustain a healthy ecosystem. For over thirty years my business and others in the California ecotourism industry have been dependent on healthy levels of forage species to nourish whales off the California coast.

I write to urge you to prevent new fisheries from opening on unmanaged forage species.

San Francisco Bay Whale Watching has been providing whale watching tours and natural history expeditions for the past 30 years. At San Francisco Bay Whale Watching, people participate in whale watching and natural history expeditions, starting in the San Francisco Bay and moving to the Gulf of the Farallones National Marine Sanctuary. The sanctuary is home to twenty-six federally listed endangered or threatened species, and the only recovering Blue Whale population on the planet regularly feeds there. This would not be possible if not for the abundance of forage species that the Blue Whales and other large species depend on to sustain themselves.

New fisheries on unmanaged forage species could disrupt the vital California marine ecosystem and force larger species to migrate elsewhere or perish, endangering not only these precious animals but also the livelihoods of me and those like me up and down the coast.

I urge the Pacific Fishery Management Council to take proactive steps to prevent the expansion of new fisheries for currently unmanaged forage fish species. By preventing these new fisheries, you can help to ensure the health and sustainability of the entire ecosystem.

I hope that you consider the ecotourism industry as you continue to address the status of unmanaged forage species. Thank you for your time and consideration on this significant issue affecting us in California.

Regards,


Captain Verne Bryant
San Francisco Bay Whale Watching

Harbor Breeze Corporation

June 4, 2012

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

Dear Chairman Wolford and Council Members,

I am writing on behalf of Harbor Breeze Cruises, a southern California cruise company run out of Long Beach, that has been offering seasonal whale watching cruises for nearly twenty years. I am writing to urge you to prevent new fisheries on currently unmanaged forage fish until the important role they play in the marine ecosystem is studied.

Throughout the year, our guests are treated to sightings of Gray and Blue Whales, Fin Whales, Humpback Whales, Minke Whales and Killer Whales. Other wildlife frequently spotted are a variety of dolphins including Common, Bottlenose, Risso's, and Pacific White Sided, as well as sea lions. These marine mammals are drawn to the California Current along the coast due to the abundance of nourishment that a healthy population of forage fish provides.

As increasing numbers of forage fish are carelessly pulled from the water to be used as cheap sources of protein in animal feed for livestock, poultry and fish farms, we are worried that there may not be enough left in the water to support all of the marine mammals that we love watching from our boats every year.

One passenger recently noted, "Thanks to you, my visitors from Indiana, husband and I had the most incredible experience with an afternoon of whale watching. Not only did we see common dolphins, bottlenose dolphins, a sea lion, a seal and a pair of gray whales (twirling), but we believe you also provided us with perfect weather out on the water. We thank you again. It was an amazing experience."

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

We hope to continue our work for many years to come, which is why we are urging the Council to express the responsible foresight by preventing new fisheries on unmanaged forage species until a management plan is in place that takes into account their important role in the marine food web.

We appreciate the opportunity to offer our support for this issue and would be happy to provide additional comments to the Council, if needed.

Sincerely,



Amber Boyle
Vice President
Harbor Breeze Cruises

Little **Fish – BIG Deal!**

Charlton H. Bonham
Director
California Department of Fish and Game
1416 Ninth Street, 12th Floor
Sacramento, CA 95814

Cc: Pacific Fishery Management Council

Dear Director Bonham,

I am writing to ask you to support the Pacific Fishery Management Council's effort to maintain a healthy marine ecosystem, starting by setting aside forage species that aren't currently protected even though they occupy a critical position in the marine food web. Small prey fish support economically important fisheries in California such as those for salmon, albacore tuna, and groundfish.

In light of growing worldwide demand to convert wild-caught forage into feed for poultry, livestock, and farmed fish, I believe it is imperative for the PFMC to stop the expansion of new fisheries on forage species until the science is in place to manage them sustainably.

The council's draft ecosystem plan notes that new species of forage fish are likely to grow more attractive as potential fishing targets because of the spectacular growth of aquaculture. The council may not be able to control global market trends, but it can do its part to make sure we protect forage fish for their value to a productive and healthy marine food web along the Pacific coast.

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

Sincerely,

John Anjard, *San Diego, CA*
Luther Asbury, *Ventura, CA*
Zeena Atig, *Oakland, CA*
Christian Billson, *Los Alamitos, CA*
Eileen Bradford, *Biggs, CA*
Lucinda Brisbane, *Stinson Beach, CA*
Sarah Burt, *Oakland, CA*

Kathy Carroll, *Oakland, CA*
Eva Cicoria, *Rancho Palos Verdes, CA*
Taylor Debevec, *Costa Mesa, CA*
Joey Dirkes, *Roseville, CA*
Lauren Dockendorf, *Santa Cruz, CA*
Alan Dower, *Hayward, CA*
Linda Dunsmore, *Santa Cruz, CA*

Jenn Eckerle, *Santa Barbara, CA*
Kathleen Flick, *Manhattan Beach, CA*
John Freutel, *Oxnard, CA*
Nidia Golla, *Montclair, CA*
Don Gourlie, *Newport Beach, CA*
Paul Hobi, *San Francisco, CA*
Nora Jaffe, *La Jolla, CA*
Irene Kennett, *National City, CA*
Sarah Kirschbaum, *Los Angeles, CA*
Tim Lawnicki, *Lakewood, CA*
Cheri Lyon, *San Francisco, CA*
Keiko M., *San Francisco, CA*
Don McEnhill, *Healdsburg, CA*
David McGuire, *Sausalito, CA*
Francie Mitchell, *Alamo, CA*
Kelly Newman, *Santa Cruz, CA*
Elizabeth O'Hara, *Roseville, CA*
Noel Oates, *La Jolla, CA*
Staci Peters, *San Diego, CA*
Mark Reback, *Los Angeles, CA*
Steve Robey, *Berkeley, CA*
Joe Sarmiento, *Los Angeles, CA*
Teri Shore, *Sonoma, CA*
Brian Smith, *Oakland, CA*
Lisa Thomas, *Penn Valley, CA*
Melissa Thomas, *San Rafael, CA*
Kathleen Troeller, *Ben Lomond, CA*
Allyn Van Alstyne, *Hemet, CA*
Justine Vigil, *Orange, CA*
T.W. White-Henry, *Carmel, CA*
Lisa Wilson, *San Diego, CA*

Comments re: Agenda Item G.1
Consideration of Further Protection of Currently Unmanaged Forage Species
June 2012 Pacific Fishery Management Council Meeting

“Human beings are experts at taking advantage and exploiting our resources to make our lives more efficient. This quality is the reason that we have been so successful at adapting to our environment and progressing at such rapid rates technologically, economically, and culturally.

Another, equally important skill that we have that unfortunately often lags behind is the ability to see the future effects of our present actions. Humans are one of the few organisms that are able to view our place on earth subjectively and understand that our actions have consequences.

After working as a fisheries observer for the Gulf shrimping industry, I have seen firsthand the penchant for humans to turn a blind eye to long-term environmental degradation in exchange for short term profits. While fisheries can be thriving industries, the human trend seems to be to treat them as boom and bust economies, which get exhausted as quickly as we are able to track them down and bring them to land.

Effectively managing and protecting pacific forage fish immediately is crucial due to their place in the food chain and their vulnerability as schooling fish. Any time a level of the food chain is greatly affected there is the danger of a trophic cascade. The larger predatory species cannot remain if we take away their food source, and many of these fish populations are already at their breaking point.

The forage fish schooling behavior means that localized populations of them can be wiped out in one fishing trip; reducing genetic diversity and affecting all local predator species. Traditional management practices will not account for the unique nature of the forage fish lifestyle. Further research and cooperation with interested parties is necessary to ensure that our practices are sustainable and will leave enough forage fish to support the tuna and salmon fisheries, as well as marine mammal populations.”

Don Gourlie
Orange County Coastkeeper
Newport Beach, CA

“Let's keep the baitfish populations healthy!!”

Don McEnhill
Healdsburg, CA

"I think adequate research should be done with regards to new fisheries on forage species before moving forward. Our current fisheries are in need of help, and jumping into new ones does not seem like a good idea, at least not without evidence that it will be good for, or at least have no effect on, the ecosystem."

Taylor Debevec
Orange County Coastkeeper
Costa Mesa, CA

"We need a better understanding of the basic biology of forage fish and the fishing impacts on them. Harvesting sardines, herring and other forage fish for aquaculture and fertilizers is a waste of natural resources with potential impact all the way up the food chain. These are at the bottom of the food chain and other commercial fish and important marine wildlife rely on healthy stocks. Fishing pressure, natural cyclicity in populations and potential impacts from climate change can all have a dramatic influence on these populations potentially leading to population crashes and a cascade effect up the food chain. We need better understanding of the natural history of these fish and their ecological importance before we harvest more indiscriminately."

David McGuire
Director, Sea Stewards
Sausalito, CA

"The forage species are under attack from acidification, warmer waters, pollution and now trash including lots of plastic. These species are like the basement of a high rise, if the basement crumbles, the whole building comes down."

Sarah Kirschbaum
Faith to Green
Los Angeles, CA

"Please be forward thinking and take action."

Linda Dunsmore
Santa Cruz, CA

"We need to pay serious attention to and regulate any fishing activity that can have such significant impacts to the marine food chain."

Noel Oates
La Jolla, CA

"You have heard this thousands of times, but it is worth trying on my part: Nature is fragile. In a few short years, there will be no more polar bears, arctic foxes, or any of the Arctic creatures that we know now. If we do not start protecting the fragile, and tiniest links in this threatened chain, we will ruin this life-giving planet & that will be unforgivable."

Cheri Lyon
San Francisco, CA

"All levels of the food web need attention and protection. The forage fish are vital to so many levels, and the impacts of a potential forage species fishery can devastate the species that depend on them."

Kelly Newman
Santa Cruz, CA

"We need healthy fisheries to ensure health oceans for the future of marine life, human communities and the environment. Please protect key forage species."

Teri Shore
Sonoma, CA

"We need to do all we can to keep the ecosystem in balance and not overlook the importance of all fish in the food web."

Lisa Thomas
Penn Valley, CA