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SANTA BARBARA • SANTA CRUZ

DEPARTMENT OF ECOLOGY & EVOLUTIONARY BIOLOGY
DIVISION OF NATURAL SCIENCES
CENTER FOR OCEAN HEALTH, LONG MARINE LABORATORY
100 SHAFFER RD.

SANTA CRUZ, CALIFORNIA 95060

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

June 4, 2004

Dear Pacific Fishery Management Council Members,

The West coast of the United States supports some of the world's most important commercial fisheries. These fisheries are made possible by the extremely productive waters of the California Current System off the coast of Washington, Oregon, and California and the Alaska Current in the Gulf of Alaska. Euphausiids, or krill, play a central role in these marine ecosystems. Krill form a key link between phytoplankton (the microscopic "plants" of the ocean) and commercial and recreationally important fish, marine mammals, and seabirds. Most species (including humans) are only one or two feeding levels away from krill, and it is the primary prey of most of the commercial fish, marine mammal, and seabird species of Alaska, Washington, Oregon, and California. Commercially important species that directly or indirectly depend upon krill include salmon, pollock, rockfish, hake, flatfish, squid, mackerel and herring. The combined economic value of these resources exceeds \$5 billion annually.

Krill production in these waters support some of the most diverse marine mammal and seabird communities in the world including 8 species of endangered marine mammals and 2 species of endangered seabirds – all of which either directly or indirectly depend upon krill resources. As marine biologist that has spent over 20 years studying zooplankton and the foraging ecology of seabirds and marine mammals off the West coast of the U.S., we believe that krill is a trophic key for coastal ecosystems. In order to effectively protect these important marine resources and the ecosystem upon which they depend, it is critical to protect the integrity and health of krill off the West coast of the United States. ***Commercial fisheries can only recover if the ecosystems upon which they depend are intact.***

With the Strom-Martin Bill, California became the first state in the Union to protect krill resources by banning fishing for krill in all state waters. This bill was aimed at "protecting the marine food web by stopping any krill fishery before it could be started in the state." The Pacific Coast Federation of Fisherman's Associations and conservation groups requested the Strom-Martin bill after a krill fishery was established off British Columbia. A commercial harvest of krill off the Canadian East Coast has been implicated in the poor recovery of cod in the region; the BC krill fishery is the first off the Pacific coast. PCFFA and others were concerned that "fishing for this essential link in the food chain would prevent the recovery of highly valuable and threatened commercial fish."

"Krill are an important food source for our salmon and other marine life, including some whales," said PCFFA President Pietro Parravano. "We are extremely grateful for Assemblywoman Strom-Martin's leadership in helping us protect these forage organisms that nourish the fish our industry depends upon."

It is now time to extend protection of this fundamental prey resource to krill populations in all Pacific U.S. waters.

Worldwide, krill is commercially fished in fisheries off Japan, Canada, and the Southern Oceans of Antarctica. The current annual catch is over 150,000 metric tons, but few potential fisheries are being exploited. However, over the last 20 years krill fisheries have developed from experimental to full-scale commercial fisheries of regional importance (it is one of the most important coastal fisheries off Japan). While there are currently no commercial krill fisheries in the U.S. EEZ, interest in expanding krill fishing is growing.

New markets, particularly as feed in aquaculture, are being developed. ***Expansion of the commercial krill fishery has the potential to seriously disrupt the food webs upon which existing recreational and commercial fisheries and non-commercial marine species of Alaska, Washington, Oregon, and California depend.*** It is therefore imperative to protect this critical marine resource from all commercial harvest.

To accomplish the protection of U.S. krill resources, we urge the PPMC to adopt a commercial krill fishing ban for waters of the EEZ off the West Coast. At a minimum, we urge you to ban krill fishing in the Monterey Bay, Gulf of the Farallons, and Cordell Bank National Marine Sanctuaries. While this measure will have no economic impact on existing commercial or recreational marine resources, the initiation of a fishery may have severe impacts. While not particularly controversial, this proactive step will help preserve and maintain the health of the marine ecosystem upon which commercial and recreational users depend. Thank you for your consideration.

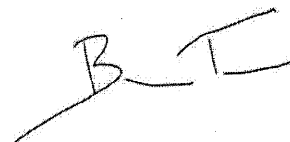
Sincerely,



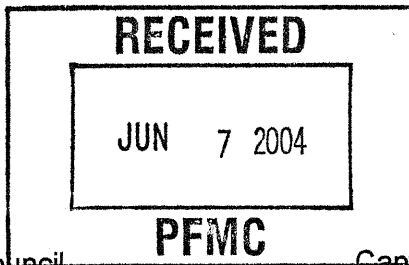
Donald A. Croll, Ph.D.
Assistant Professor



Baldo Marinovic, Ph.D.
Research Biologist



Bernie Tershy, Ph.D.
Research Biologist



G4

Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

Captain Heidi Tiura
Sanctuary Cruises
25515 Hidden Mesa Road
Monterey, CA 93940

June 5, 2004

To: Donald Hansen, Chair and Members of the Pacific Fisheries Management Council

I would like to strongly voice support for a continued ban on krill harvesting in the EEZ which includes the Monterey Bay, Gulf of the Farallones and Cordell Banks National Marine Sanctuaries. The ramifications of krill harvesting are extensive.

Blue whales and humpback whales come here to feed. Both feed on krill. Humpbacks also feed on the bait fish that feed on krill.

We are visited midsummer through fall by the only stable population of blue whales in the world. Because of this, people come here from around the world to see them, along with the other cetaceans found here in abundance. The financial impact of the whale watching industry in terms of dollars brought into the area's lodging, restaurants and ancillary businesses is substantial.

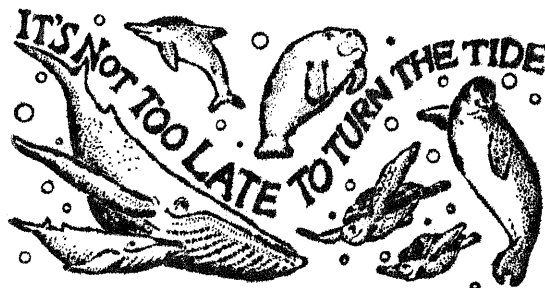
This captive audience of whales and other cetaceans is studied extensively by researchers. Research money isn't easy to find and the gift of a large population of whales and other cetaceans within easy reach is just that. A gift.

In order for the fishing industry to thrive--something it's not doing well at as it is--the food chain can't afford to lose a portion of the krill, a major building block.

Please don't allow krill harvesting in the EEZ.

Thank you,

HEIDI



Subject: [Fwd: Save Our Shores Letter of support for a Ban on Krill Harvesting]
From: "PFMC Comments" <pfmc.comments@noaa.gov>
Date: Tue, 08 Jun 2004 13:02:58 -0700
To: Daniel Waldeck <Daniel.Waldeck@noaa.gov>

----- Original Message -----

Subject: Save Our Shores Letter of support for a Ban on Krill Harvesting
Date: Tue, 8 Jun 2004 10:20:11 -0700
From: Jane De Lay <JDeLay@saveourshores.org>
To: <pfmc.comments@noaa.gov>

Dear Mr. Hansen:

Save Our Shores requests the support of the PFMC for a full ban on krill harvesting in the west coast EEZ. I understand that the issue will be a topic of discussion at the June 17, 2004, PFMC meeting in Foster City, CA. Our letter of support for the ban is attached.

Please do not hesitate to contact me at (831) 462-5660 if you have any comments or questions.

Warm regards,

Jane M. De Lay
Executive Director
Save Our Shores
345 Lake Avenue, Suite A
Santa Cruz, CA 95062
(831) 462-5660
jdelay@saveourshores.org

The mission of Save Our Shores is to protect and conserve the marine ecosystems of California's central coast for all generations.

June 9, 2004

Mr. Donald K. Hansen
Chair, Pacific Fishery Management Council
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220



RE: Agenda Item G.4 – Krill Harvest

Dear Chairman Hansen and Council Members:

On behalf of The Ocean Conservancy, we are writing to support a permanent prohibition on the harvesting of krill for commercial purposes in the West Coast Exclusive Economic Zone (EEZ). Krill are an important part of the oceanic food web, providing food for whales, squid, threatened and endangered sea birds, such as Cassin's Auklet, and many Pacific coast fish species, such as salmon, rockfish, hake and sardines. In order to maintain the health and abundance of our coastal marine environment, it is important that commercial harvesting of krill be prohibited.

The Pacific Fishery Management Council has an incredible opportunity to take a pro-active approach to managing our fish resources, which will help continue the rebuilding efforts of depleted fish populations and prevent a future crisis. Krill play a significant ecosystem role in the marine food web, and commercial fishing operations for krill on the West Coast could result in a decline of many fish populations that are important to sport and commercial fisheries, as well as marine mammals and sea birds that draw tourists from all over the world to our coast.

Furthermore commercial krill fishing operations have begun in British Columbia, where krill are caught and sold as meal for farm-raised salmon. NOAA Fisheries has already started to implement a plan to increase U.S. aquaculture production of carnivorous fish, and aquaculture operations worldwide have been expanding exponentially over the past decade. With these expansions comes increased demand to harvest krill, and added pressure to move this fishery into U.S. waters.

The time for action is now. The Ocean Conservancy supports a ban on krill harvesting under the authority of the Magnuson-Stevens Fishery Conservation and Management Act, and we strongly urge you to immediately move forward with drafting regulations to ban krill fishing off the West Coast EEZ. Thank you for consideration of our views.

Sincerely,

Karen Reyna
California Fish Program Manager

Kaitilin Gaffney
California Central Coast
Program Manager

The Ocean Conservancy strives to be the world's foremost advocate for the oceans. Through science-based advocacy, research, and public education, we inform, inspire and empower people to speak and act for the oceans.