



NATURAL RESOURCES DEFENSE COUNCIL

October 25, 2004

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

RE: Krill Harvest Ban

Dear Chairman Hansen and Council Members:

On behalf of the over 1 million members and activists of NRDC (Natural Resources Defense Council), we write to support a prohibition on krill harvesting off the West Coast. Of the options presented by NOAA Fisheries staff, we favor either Options 3 or 4 to implement this prohibition.

Krill sit at the base of the food chain and are vital forage for many seabirds, marine mammals, and fish, including overfished groundfish. One sign of krill's importance is that Alaska, California, Oregon, and Washington already prohibit krill landings. We see absolutely no justification for developing a krill fishery, particularly when so many resources are focused on rebuilding species which rely on krill. NOAA Fisheries' Option 2 would signal approval for a krill fishery by placing krill into a fishery management unit, a category generally reserved for targeted or marketable species. Moreover, management unit species require extensive analysis, including the calculation of MSY or an MSY proxy and the identification of EFH. If the Council's intent mirrors that of the states, as we believe it should, then there is no need to take on the workload of an FMP amendment for a management unit species.

Krill fishing can be prohibited through a generic forage fish amendment (Option 3) or by adding a prohibition to the current draft EFH EIS (Option 4). While we support either approach, we would note that Alaska's forage fish amendment was approved in 1997, prior to widespread implementation of Magnuson-Stevens' EFH prohibitions. EFH is an appropriate place for krill protection as part of the biological component of habitat.

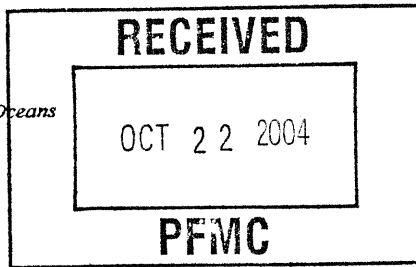
With both Options 3 and 4, much of the groundwork has already been done by NOAA Fisheries and other Councils; we anticipate the burden on Pacific Council members and staff to be minimal. We encourage the Council to send a strong signal opposing the development of a commercial krill fishery by adopting Option 3 or 4.

Sincerely,

Kate Wing
Ocean Policy Analyst

Karen Garrison
Co-Director, Ocean Initiative

Public Comment
Agenda Item H.4
Krill



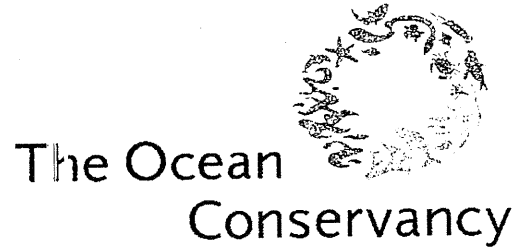
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Formerly the Center for
Marine Conservation

October 22, 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 H.4.b – Krill Harvest
Support for Option 3: Designate Krill as Forage
Species and Prohibit 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). Specifically, The Ocean Conservancy supports adoption of either Option 3 or Option 4 presented in your staff report.

The Ocean Conservancy urges the Pacific Fisheries Management Council to adopt a generic FMP amendment to establish krill as forage in all applicable FMPs within the Council's jurisdiction. We support Option 3 as the best method of prohibiting krill harvest because it is simple, could be implemented quickly and with a modest investment of staff time and Council resources, and follows the example of North Pacific Council's bans on krill harvest in the Gulf of Alaska and Bering Sea groundfish FMPs which have proven effective. We believe that Option 4, which calls for designating krill as a component of essential fish habitat (EFH) for groundfish via amendment of the Groundfish Fishery Management Plan, also presents a legitimate approach to prohibiting take of krill. However, we are concerned that Option 4 would postpone action on this matter until the completion of the EFH Environmental Impact Statement, resulting in unnecessary delay.

We believe that the other alternatives presented in your staff report are inadequate. Relying on existing authorities (Option 1) provides insufficient protection for krill and the many species that rely on krill for forage. Incorporating krill as a management unit species in the CPS FMP (Option 2) would require an ongoing staffing and resource commitment to determine the biomass of krill and the appropriate harvest level (if any).

As you know, 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. 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,

Kaitilin Gaffney
California Central Coast Program Manager