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Mr. D. Robert Lohn
NOAA Fisheries Regional Administrator
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September 13, 2005

Mr. Donald Hansen, Chairman
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 200
Portland, OR 97220-1384

Delivered via first-class mail, email: pfmc.comments@noaa.gov and facsimile (503)820-2299

RE: Krill management

Dear Mr. Lohn and Mr. Hansen:

Oceana and many others appreciate your attention to the importance of the forage fish, krill. We urge NOAA and the Pacific Fishery Management Council to take the necessary action to ban the commercial harvest of krill. As you know, **krill form the base of the marine food web**. Krill are a keystone forage species for much of the life in the California Current Large Marine Ecosystem, a significant portion of which falls within the Exclusive Economic Zone of the coasts of Washington, Oregon and California. By consuming phytoplankton, krill provide an essential link between primary production and higher trophic levels. These small crustaceans are a crucial food source for juvenile and adult salmonids, spiny dogfish, rockfish, Pacific hake, seabirds, sardine, herring, squid, baleen whales, and many other species.

Removing krill through commercial harvest would upset this balance and have significant and wide-ranging adverse effects. Krill occur in "patchy" distributions associated with upwelling zones. Patchily distributed populations are susceptible to localized depletion, as would occur with a commercial harvest. In addition, bycatch problems in a commercial krill fishery would occur on a micro-scale with macro-level effects. The fine mesh nets needed to sieve krill from the ocean will capture even the smallest larval fish. Additional strain on already taxed populations of overfished groundfish species is risky and unnecessary. The cumulative impacts of a commercial krill fishery would be severe. Pressure on overfished groundfish species, endangered seabirds, and endangered marine mammals would be exacerbated.

We've seen what can happen when krill disappear. Earlier this summer, upwelling currents failed to materialize off the California coast and subsequently so did the life-sustaining swarms of krill. Seabird die-offs were the most immediate reported result, and other ecosystem effects will undoubtedly be discovered. While this particular krill event was environmental in nature, it



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Mr. D. Robert Lohn and Mr. Donald Hansen
September 13, 2005
Page 2 of 2

serves as an example of the cascading environmental effects fluctuations in krill biomass can cause and underscores the unnecessary risk a commercial catch would pose.

The Regional Fishery Management Councils have an opportunity to take a holistic ecosystem approach and provide protection for krill throughout U.S. waters. One of the Councils has taken such action. The North Pacific Fishery Management Council has taken action to protect krill and other forage fish in the North Pacific by creating a forage fish species category and banning the directed commercial harvest of krill.

The Pacific Fishery Management Council is discussing several options for krill management. We strongly urge the Pacific Fishery Management Council to take action to ban the development of a commercial directed fishery for krill. We support the adoption of a rule that specifically prohibits directed fishing for the forage fish krill at all times in federal waters of the Pacific. This action is necessary to conserve and manage the forage fish, krill, of the Pacific and further the goals and objectives of the Fishery Management Plans. We look forward to working with you on this issue.

Sincerely,



Jim Ayers
Director, Pacific Region

cc: PFMC members
Mr. Leonard Scardino
Dr. Donald McIsaac