



U.S. DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE
National Marine Sanctuary Program

West Coast Region
99 Pacific Street, Bldg 200, Suite K
Monterey, CA 93940

February 13, 2006

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

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PFMC

Dear Mr. Hansen:

As the Acting Regional Superintendent of the West Coast Region of the National Marine Sanctuary Program (NMSP), I would like to take the opportunity to thank and commend you and the staff of the Pacific Fishery Management Council (Council) for the time you have devoted to addressing the threat that a krill fishery poses to the marine ecosystem and the region's fisheries.

As you know, concern about the adverse impacts of a krill fishery first arose during the Joint Management Plan Review process for the national marine sanctuaries in central California. This concern was based on the serious potential impacts a krill fishery could have both on the integrity of the marine ecosystem, and the region's fisheries. The NMSP approached the Council with a request to prohibit krill fishing within central California sanctuary boundaries. We remain highly appreciative of the Council's positive response and are encouraged that the Council saw sufficient merit in our request to select a preliminary preferred alternative that identifies krill as a prohibited species throughout federal waters. I know that the Council and NOAA Fisheries have a large number of pressing issues before them, but allocating the resources required to address a precautionary issue -to protect ecosystems and fisheries- shows foresight that the Council and NOAA Fisheries should be commended for.

I also believe that this process has been a successful example of effective collaboration. Over the last several years the relationship between the NMSP and the Council has grown, as has our understanding for our respective interests and processes. I believe that the Council's willingness to address the krill harvesting issue has both highlighted our common interests and our ability to work together to achieve them.

Thank you again for your efforts, and we look forward to successful collaboration in the future.

Sincerely,

William J. Douros
Acting Regional Superintendent

February 15, 2006

Mr. D. Robert Lohn, Regional Administrator
NOAA Fisheries
7600 Sand Point Way NE
BIN C15700, Bldg. 1
Seattle, WA 98115-0700

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

RE: Agenda Item H-2: Fishery Management Plan Amendment—Krill Management

Dear Mr. Lohn and Mr. Hansen:

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 Large Marine System off the coasts 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 species of commercial fish, marine mammals, and seabirds 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 supports some of the most diverse marine mammal and seabird communities in the world including eight species of endangered marine mammals and two species of endangered seabirds – all of which either directly or indirectly depend upon krill resources. As marine biologists concerned about ecosystem conservation, 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.***

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***

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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 PFMC to adopt regulations that would preclude any krill harvest from waters of the EEZ off the West Coast. 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.
Associate Professor
UC Santa Cruz Ecology and Evolutionary Biology, Institute of Marine Sciences

Michael F. Hirshfield, Ph.D.
Senior Vice President, North America, and Chief Scientist
Oceana

Baldo Marinovic, Ph.D.
Research Biologist
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Professor of Mathematical Biology; Fellow, Stevenson College
Director, Center for Stock Assessment Research
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Mark Carr, Ph.D.
Associate Professor
UC Santa Cruz Ecology and Evolutionary Biology, Center for Ocean Health

Daniel Pauly, Ph.D.
Professor and Chair
Fisheries Centre
University of British Columbia

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Robert Warner, Ph.D.
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A. Starker Leopold Chair in Wildlife Biology and
Professor of Conservation Biology
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Gregor M. Cailliet, Ph.D.
Professor, Moss Landing Marine Laboratories
Program Director Pacific Shark Research Center

William J. Sydeman, Ph.D.
Director, Marine Ecology Division
PRBO Conservation Science

Subject: kril

From: "Brian O'Neill" <btoneill@earthlink.net>

Date: Mon, 23 Jan 2006 10:08:34 -0800

To: <pfmc.comments@noaa.gov>

Hi:

It's a beautiful day at Gooseberry Point. I was born in Ballard in 1938. I can remember looking at the see of lights at night on Puget sound, when the sallmon were running. i can also remember when those small trawlers by the hundreds were abandoned in mud flats and estuary's after the salmon disapeared. The salmon are gone and those boats have long since decayed. My father was in the salmon business and we lived well than had nothing to do. I had a good job in another industry and have lived well but I see kril fishing as I do salmon. At first they look like an unending supply. There are so many of them. Ther aren't. They will go the same way as the salmon and so will the animals that rely on them.

Please vote no on the Kril fishing propsal:

Brian O'Neill
Bellingham, Wahington

Subject: Krill Management EA
From: "Lou Anna Denison" <lannd4animals@charter.net>
Date: Wed, 8 Feb 2006 17:04:09 -0800
To: <pfmc.comments@noaa.gov>

As you probably know, krill is the lifeblood of so many of the marine animal species. We can't allow the natural source of food for our wild marine animals to be depleted by krill fisheries to supply fish farms!

Please chose an alternative that would ban commercial krill fisheries in the Pacific.

Thank you.

Mr. & Mrs. James L. Denison
6931 E. 11th St.
Long Beach, CA 90815

Subject: Speaking as a long-time diver
From: "J Shaefer" <jshaefer@nvbells.net>
Date: Fri, 10 Feb 2006 20:46:31 -0800
To: <pfmc.comments@noaa.gov>

Dear Dr. McIsaac,

I have dived for over 30 years and I must tell you that I have VISIBLE, PERSONAL, EMPIRICAL evidence that drift gillnet fishing kills as many "unintended" victims as it does those that can be sold, enriching a few while impoverishing us all. Even an experimental fishing permit is not needed: we've been "experimenting" for years and the results are in. These things kill indiscriminately. Five years ago this activity was restricted because endangered leatherback sea turtles were being caught and killed in its gillnets. Even today, these gillnets inadvertently catch more than 30 different species of marine life, including many marine mammals and seabirds.

The Pacific Fishery Management Council should not consider reopening the area now closed to protect leatherback sea turtles while their populations remain perilously low. I urge the Council to maintain the current regulations to protect leatherback turtles and other marine life and to preserve the sustainability of our oceans and our fisheries.

Sincerely,

VR/ JLS
Brig Gen Joseph L Shaefer
USAF, Ret
Ph: 775 832-5440