

*The following public comment is representative of 39 postcards, mailed to the Council:*

Date: Feb 16, 2006

Dear Mr. Hansen:

**As emphasized by Oceana and others in public comments, krill are a critical component of the Pacific marine food web.**

**As you consider the Krill Environmental Assessment, please adopt the management alternative that prohibits all commercial krill fishing in the federal waters off Washington, Oregon, and California.**

Sincerely,

Name: ROBERT L COLLINS  
Address: 1051 DRIFTWOOD LN  
City: VENTURA  
State: CA Zip: 93001  
Email: Marleytoo@aol.com

PRBO Conservation Science  
4990 Shoreline Highway  
Stinson Beach, CA 94970-9701

tel 415 868-1221  
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prbo

RECEIVED

FEB 21 2006

PFMC



Christine Abraham  
PRBO Conservation Science  
4990 Shoreline Hwy  
Stinson Beach, CA  
94970

February 17, 2006

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

Re: Coastal Pelagic Species Fisheries Management Plan – Krill Management

Dear Chairman Hansen,

I am writing on behalf of Marine Ecology Division at PRBO Conservation Science. For the conservation and protection of upper trophic level marine predators, it is our position to support management action "Alternative 2" (Manage Krill Fishing Through Amendment of the CPS FMP, Preliminary Preferred Alternative) listed in Draft Amendment 12 to the Coastal Pelagic Species Fishery Management Plan.

Thank you for your consideration of our comments. Please contact us with any questions or concerns.

Sincerely,

Christine Abraham

email: cabraham@prbo.org  
phone 415-868-1221 ext. 334

Dear Chairman Hansen:

CC: W.J. Sydeman

*The following public comment is representative of **over 5,700** copies sent to the Council via email:*

I am urging the PFMC to adopt Alternative 2, the preferred alternative that amends the Coastal Pelagic Species Fishery Management Plan to include all species of krill as prohibited species and denies the use of exempted fishing permits to fish for krill.

When the water is cold and conditions right, krill swarm off the Pacific coast by the tens of thousands of tons. These animals serve as a giant food buffet for the sea, providing sustenance for baleen whales, seabirds, rockfish, Pacific salmon, hake, squid, and many other fishes.

Last summer disaster struck when upwelling currents failed to materialize off the Pacific Coast, and without these currents, there were no life-sustaining swarms of krill. The most visible and shocking results were the tens of thousands of dead seabirds on California, Oregon, and Washington shores, their emaciated bodies a sad testimony of what can happen if the ocean ecosystem food web is depleted.

Please adopt the preferred alternative that amends the Coastal Pelagic Species Fishery Management Plan to include all species of krill as prohibited species.

Thank you for your time and attention.

Lisa Balach  
510 Temona Drive

Pittsburgh, PA 15236

*The following public comment was sent to the Council via email:*

Subject:my comment about krill  
From:Amanda Jane Cundiff <amandac@bren.ucsb.edu>  
Date:Thu, 23 Feb 2006 10:51:11 -0800  
To:pfmc.comments@noaa.gov

Dear Pacific Fishery Management Council,

As an ecologist-in-training, I am very concerned about our ocean foodweb in the North Pacific Ocean. I encourage you to PROHIBIT KRILL FISHING in the Pacific Ocean. I believe you should follow the states' lead and take action on this important issue.

Thanks,  
Amanda

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Amanda Jane Cundiff  
Master's Candidate 2006  
Donald Bren School of Environmental Science and Management  
University of California-Santa Barbara  
amandac@bren.ucsb.edu

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Subject:Save the krill, adopt Alternative 2  
From:Maria Bustillos <maria@popula.com>  
Date:Thu, 23 Feb 2006 16:06:04 -0500 (EST)  
To:pfmc.comments@noaa.gov

Please adopt Alternative 2, the preferred alternative that amends the Coastal Pelagic Species Fishery Management Plan to include all species of krill as prohibited species and denies the use of exempted fishing permits to fish for krill.

Please adopt the preferred alternative that amends the Coastal Pelagic Species Fishery Management Plan to include all species of krill as prohibited species.

Thank you.  
Maria Bustillos  
358 S. Westmoreland Ave  
Los Angeles, CA 90020

Subject:krill protection  
From:Thomas Aldridge <thomasaldrige95112@yahoo.com>  
Date:Thu, 23 Feb 2006 16:35:02 -0800 (PST)  
To:pfmc.comments@noaa.gov

I strongly support the protection of the krill within federal waters off the west coast of the USA.I urge you to prohibit harvesting or fishing of the krill within the 200 mile area from the west coast. This is an extremely valuable source of food for the birds and the mamals and it would be a catastrophe if this food supply was overfished by man. This could very swell end up as the Century of Extinction if we do not start to protect and save rather than allowing unlimited fishing and unlimited destruction of marine life.

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Subject:Protect Krill  
From:Beth Dorton <KDorton@aol.com>  
Date:Thu, 23 Feb 2006 22:00:19 -0500 (EST)  
To:pfmc.comments@noaa.gov

I am concerned about the health of our oceans and the diversity of life they support...and ultimately we humans are also dependent upon the ecosystems under sea. I am writing to urge the PFMC to adopt Alternative 2, the preferred alternative that amends the Coastal Pelagic Species Fishery Management Plan to include all species of krill as prohibited species and denies the use of exempted fishing permits to fish for krill.

When the water is cold and conditions right, krill swarm off the Pacific coast by the tens of thousands of tons. These animals serve as a giant food buffet for the sea, providing sustenance for baleen whales, seabirds, rockfish, Pacific salmon, hake, squid, and many other fishes.

Last summer disaster struck when upwelling currents failed to materialize off the Pacific Coast, and without these currents, there were no life-sustaining swarms of krill. The most visible and shocking results were the tens of thousands of dead seabirds on California, Oregon, and Washington shores, their emaciated bodies a sad testimony of what can happen if the ocean ecosystem food web is depleted.

Please adopt the preferred alternative that amends the Coastal Pelagic Species Fishery Management Plan to include all species of krill as prohibited species.

Thank you for your time and attention.

Beth Dorton  
14028 Orchard Drive  
Clarks Summit, PA 18411

Subject:PFMC- Adopt alternative 2  
From:Debbie Daehnick <ddaehnick@yahoo.com>  
Date:Thu, 23 Feb 2006 16:25:48 -0500 (EST)  
To:pfmc.comments@noaa.gov

Please adopt Alternative 2, the preferred alternative that amends the Coastal Pelagic Species Fishery Management Plan to include all species of krill as prohibited species and denies the use of exempted fishing permits to fish for krill.

It's all connected as you know. Without the krill there is no food for the fish birds and whales that depend on it for their survival. Repeating last year's scenario of thousands of dead creatures on the coast is unacceptable.

Sincerely,  
Debbie Daehnick  
2935 Cherokee Ct  
Erie, CO 80516

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Subject:harvesting krill  
From:tripper <tripper@ebold.com>  
Date:Tue, 28 Feb 2006 08:29:53 -0800  
To:pfmc.comments@noaa.gov

An amendment to allow harvesting krill is a foolish move. Krill represent a major foundation of the ocean food chain, and there is never an excess of krill. To deplete this valuable resource would be to deplete ocean species in general. Absolutely NO!

Meade Fischer  
478 Cloudview Dr.  
Watsonville, CA 95076  
(831) 763-2660

Subject:Krill Fishing  
From:"Randy Repass" <RandyR@westmarine.com>  
Date:Tue, 28 Feb 2006 17:09:51 -0800  
To:<pfmc.comments@noaa.gov>

Pacific Fishery Management Council,

The proposed commercial krill fishery would be devastating to the already jeopardized sea life that so depends upon it as a food source.

Vote no to commercial krill fishing.

Regards,  
Randy Repass  
Chairman  
West Marine  
500 Westridge Dr.  
Watsonville, CA 95076

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Subject:Pacific Krill Fishery  
From:"Sally-Christine Rodgers" <scr@westmarine.com>  
Date:Tue, 28 Feb 2006 17:19:38 -0800  
To:<pfmc.comments@noaa.gov>

Pacific Fishery Management Council Members,

The seabirds, whales and fish that rely on krill as an integral part of their diets should not have to compete with salmon farms for this vital food source!

I urge you to vote to prohibit the commercial krill fishery in the Pacific.

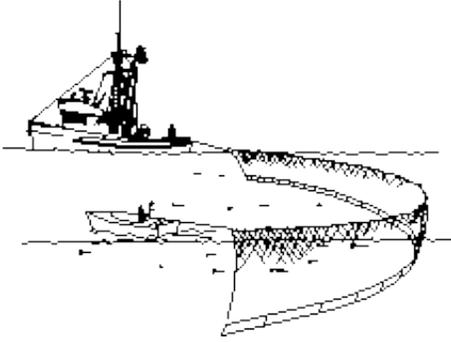
Fish farms create pollution, disease and contribute to the decline of wild species.

Commercial fishing of krill would devastate already fragile populations of Sealife.

Sleep at night!

**VOTE NO ON COMMERCIAL KRILL FISHING!**

S-C Rodgers  
Santa Cruz, California



**CALIFORNIA WETFISH PRODUCERS  
ASSOCIATION**

*Representing California's Historic Fishery*

February 27, 2006

Dr. Don McIsaac, Executive Director  
Mr. Don Hansen, Chair  
Members of the Pacific Fishery Management Council  
7700 NE Ambassador Place #200  
Portland, OR 97220-1384

RE: Agenda Item H.2.d ALTERNATIVES FOR KRILL MANAGEMENT

Dear Dr. McIsaac, Chairman Hansen and Council members,

These comments are submitted on behalf of the California Wetfish Producers Association, which represents the majority of wetfish processors and fishermen in Monterey and southern California. We appreciate this opportunity to present our views and concerns regarding Council action to adopt a final preferred alternative for Amendment 12, incorporating krill into the CPS FMP.

**Re: H.2.d.** – Alternatives for Krill Management

As a member of the Coastal Pelagic Species Advisory Subpanel, I supported the CPSAS statement presented to the Council on this issue. However, as with the November report, I again appreciate this opportunity to clarify the perspective of CWPA and California's wetfish industry.

CWPA members agree that krill is essential to the ecosystem as forage for other marine life. We understand and support the Council's interest in acting to protect krill from the unintended consequence of unregulated fishing. We also appreciate that the proposed amendment places krill into a separate category as industry representatives recommended. Hopefully this will isolate the Council's proposed action to prohibit a krill harvest from management activity on other forage species that have been the basis of historic and currently important wetfish fisheries.

However, we also agree in concept with CPSAS statements that categorizing krill as a "prohibited harvest" without adequate information is inappropriate – potentially precedent setting, and the door to explore possible future harvest opportunities should remain open, with the ultimate decision to be based on scientific justification. Still, we don't foresee major business opportunities for CA's wetfish industry to harvest krill, considering krill's very short shelf life and the likelihood that such a harvest would necessitate onboard processing. Further,

CWPA members that I polled believe CA's wetfish industry will be in a stronger position to maintain our historic wetfish fisheries if we acknowledge and respect krill's importance in the ecosystem.

In our November letter we echoed CPSAS concern re: diverting funding and resources to krill at a time when considerable work and research on other CPS, specifically sardine, have been requested repeatedly and are currently under-funded and incomplete. We again urge the Council to request additional research funding encompassing all the CPS species, including sardine and squid as well as krill. NOAA is currently soliciting stakeholder comments on future budget priorities, and we would appreciate a letter from the Council emphasizing the need for and importance of this expanded research.

Thank you very much for your consideration of these comments.

Best regards,

Diane Pleschner-Steele  
Executive Director



February 28, 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:

Oceana urges the Pacific Fishery Management Council and NOAA Fisheries to move forward with the goal of protecting the health of the Pacific marine ecosystem by adopting measures to prohibit fishing for krill in the West Coast EEZ. Specifically, we support the Council's preliminary preferred alternative (Alternative 2) in the draft Environmental Assessment (EA) and Amendment 12 to the Coastal Pelagic Species FMP. The record and evidence provided in the draft EA and in public comments clearly support the proposed action. As the Council has recognized, krill are a critical component of the California Current Large Marine Ecosystem. Alternative 2 protects the crucial ecological role krill play in the marine ecosystem and thus helps to minimize the risk of irreversible harm to managed fisheries and other marine life that depend on krill for survival.

By adding krill to the CPS FMP and establishing a "prohibited harvest" species category for krill, the Council and NMFS will effectively prohibit directed harvest of krill in the West Coast EEZ. This measure is consistent with a similar action taken by the North Pacific Fishery Management Council and with the state laws of Washington, Oregon and California. Further, the analysis explains the prohibition of fishing for krill is consistent with Magnuson-Stevens Act objectives. Of the alternatives analyzed, Alternative 2 provides the greatest benefit to the health of the ecosystem at no cost to existing fisheries. It is neither the intent, nor a consequence of adopting this measure that existing fisheries will be impacted. In fact, this action provides for the long-term sustainability of current fisheries by protecting krill species that are central in the diet of many managed fish.

A vital component of Alternative 2 is the provision that denies the issuance of exempted fishing permits (EFP) for krill. Allowing for an EFP to fish krill would be contrary to the objectives of the Environmental Assessment and stated intent of the Council, since the only purpose of an EFP

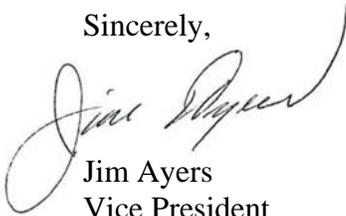
Mr. D. Robert Lohn  
Mr. Donald Hansen  
February 28, 2006  
Page 2

would be to develop markets for krill and initiate a full-blown commercial krill fishery. As the draft EA describes, "The risk of adverse effects from a krill fishery is unacceptable. No fishing for krill should be permitted given the importance of krill in the environment, the value of krill as forage for fish and other living marine resources of krill in the environment, and the importance of those other living marine resources to the people of the United States and of the West Coast." Any ancillary benefits to scientific research that could be gained while fishing under an EFP can just as easily be achieved through existing or future directed research on krill and their role in the marine ecosystem.

Existing research on krill demonstrates the critical role these animals play in the California Current Large Marine Ecosystem. Krill are prey for whales, seabirds and many commercially important fish. For example, blue whales feed exclusively on krill and consume over one ton of krill per day when feeding off the coast of California (Croll et al 2005). Other research has determined that the availability of krill is directly correlated to the growth and productivity of Cassin's auklet (Abraham and Sydeman 2004). Additionally, researchers have reported that during El Niño years a warm water krill species has become the principal food of juvenile Coho salmon off Oregon and Washington (Brighton and Townsend 2003). The draft EA further documents the importance of krill to many commercial fish species and other marine life including Pacific hake, market squid, herring, sablefish, rockfish and others.

Adoption of Alternative 2 by the Council will protect the Pacific marine food-web and protect current fisheries from the danger inherent in any commercial harvest of krill. We believe this action to conserve krill and maintain the role krill play in the ecosystem moves fisheries management further towards an ecosystem-based approach. We appreciate the interest the Council and NOAA Fisheries have expressed and we urge you to take final action by adopting Alternative 2.

Sincerely,



Jim Ayers  
Vice President

References:

Brinton, E. and A. Townsend. 2003. Decadal variability in abundances of the dominant euphasiid species in southern sectors of the California Current. *Deep-Sea Research II*. 50: 2449-2472.

Croll, D.A., B. Marinovic, S. Benson, F.P. Chavez, N. Black, R. Ternullo, and B.R. Tershy. 2005. From wind to whales: trophic links in a coastal upwelling system. *Mar Ecol Prog Ser*. 289:177-130.

Abraham, C.L. and W.J. Sydeman. 2004. Ocean climate, euphasiids and auklet nesting: inter-annual trends and variation in phenology, diet and growth of a planktivorous seabird, *Ptychoramphus aleuticus*. *Mar Ecol Prog Ser*. 274: 235-250.