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Sanctuary Advisory Council Monterey Bay National Marine Sanctuary

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June 20, 2008

Mr. Rodney R. McInnis, Regional Administrator
Southwest Region, NMFS
501 West Ocean Blvd., Suite 4200
Long Beach, CA 90802

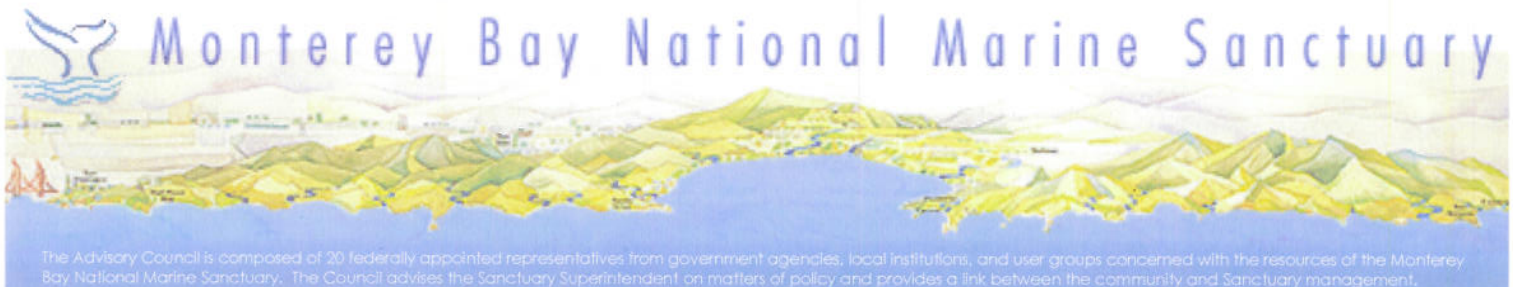
Reference: - Support for Proposed Federal Rule (I.D. 012607A-PR) Implementing
Permanent Prohibition on Krill Harvest

Dear Mr. McInnis:

Please accept this letter of support from the Monterey Bay National Marine Sanctuary's Advisory Council regarding the proposed rule issued by the National Marine Fisheries Service to permanently prevent the harvest of all krill species between 3-200 miles of the coast of California, Oregon and Washington.

Currently krill are not harvested within the Sanctuary, however the potential exists for this fishery to develop in the future due to an increasing need for aquaculture feed. A krill fishery could not only severely impact the integrity of the marine ecosystem but could adversely affect commercial and recreational fisheries of all kinds as most target species are directly or indirectly dependent on the resource. Krill are a critical component of the marine ecosystem and fundamental to the trophic structure of the marine life within the Sanctuary. The two principal species of krill that exist within the MBNMS and throughout the California current are *Euphausia pacifica* and *Thysanoessa spinifera*. These species are preyed upon by many commercially important species within Sanctuary waters including salmon, rockfish, squid, sardine, mackerel and flatfish. Blue whales, humpbacks, and numerous seabirds including sooty shearwaters, marbled murrelets, and common murrets are dependent on krill as forage.

As you know, the Monterey Bay National Marine Sanctuary and our Advisory Council have a long history of involvement on this issue. The importance of protecting krill from potential future harvest was initially raised as an issue of concern by members of the public during the scoping process for the Joint Management Plan Review (JMPR). A krill harvesting working group made up of sanctuary staff and scientific experts helped develop a Krill Harvesting Action Plan that was included in the draft JMPR. In 2003, the SAC unanimously adopted the Krill Harvesting Action Plan with the following goal:



To protect the marine ecosystem of the Monterey Bay National Marine Sanctuary by identifying and pursuing a strategy that will lead to a permanent ban on krill harvesting within Sanctuary waters

In accordance with the Krill Harvesting Action Plan, in 2004 the Sanctuary formally requested that the Pacific Fishery Management Council (PFMC) pursue a ban on krill harvest within Sanctuary waters. In October 2005, the PFMC considered this issue and decided to instead pursue a ban on krill harvest throughout the waters under their jurisdiction off California, Oregon and Washington. In March 2006, the PFMC adopted Amendment 12 to the Coastal Pelagic Species Fisheries Management Plan which would prohibit harvest of krill in this region.

Our Advisory Council was pleased to learn that on May 21, 2008, NOAA's Fisheries Service issued a proposed rule implementing a permanent ban on all harvest of krill in federal waters off California, Oregon and Washington. We strongly support this proactive measure to protect Sanctuary living marine resources.

Sincerely,



Chris Harrold
Sanctuary Advisory Council Chair