

MARINE MAMMAL COMMISSION
4340 East-West Highway, Room 700
Bethesda, MD 20814-4447

18 June 2008

Rodney R. McInnis
Regional Administrator, Southwest Region
National Marine Fisheries Service
501 West Ocean Blvd., Suite 4200
Long Beach, CA 90802

Dear Mr. McInnis:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the National Marine Fisheries Service's proposed rule to prohibit krill harvesting in the U.S. Exclusive Economic Zone along the West Coast, including California, Oregon, and Washington (73 FR 29104).

RECOMMENDATION


The Marine Mammal Commission recommends that the Service implement Amendment 12 of the Coastal Pelagic Species Fishery Management Plan to prohibit commercial harvesting of all species of krill in the exclusive economic zone off the West Coast.

RATIONALE

The Service provides a clear rationale for prohibiting the harvesting of krill in its Federal Register notice. Krill are an important prey for higher trophic levels including fishes, seabirds, and marine mammals. Reducing the biomass of krill in this region could have significant economic consequences for fisheries targeting species that depend on krill, and ecological consequences for protected seabirds and marine mammals, including a number that are listed as endangered, threatened, or depleted. Endangered marine mammals that consume krill in this region include blue, fin, humpback, and North Pacific right whales. Competition could result both from the overall reduction in krill biomass and from localized depletion of krill concentrations that would be targeted by fishermen and are essential for efficient foraging of other krill consumers. In addition, trawling for krill could result in disturbance and bycatch of other fishes, seabirds, and marine mammals. Prohibiting a krill fishery is consistent with sound principles of ecosystem management. It also makes economic sense to prevent the initiation of an ill-conceived fishery rather than be forced to close a fishery after capital has been invested and participants are driven to recover their investments. The Marine Mammal Commission concurs with the Service and recommends that it implement Amendment 12 of the Coastal Pelagic Species Fishery Management Plan to prohibit commercial harvesting of all species of krill in the exclusive economic zone off the West Coast.

The Commission appreciates the Service's clear, thorough analysis and wise conservation decision. Please contact me if you have questions regarding our recommendation or rationale.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director