



Cordell Bank 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 : I.D. 012607A-PR

Dear Mr. McInnis:

On behalf of the Cordell Bank National Marine Sanctuary Advisory Council, a body composed of 12 private citizens from a range of backgrounds representing local communities adjacent to Cordell Bank NMS, I would like to reaffirm our support for the above referenced proposed federal rule. This rule prohibits the commercial harvest of all species of krill by any fishing vessel operating in the Exclusive Economic Zone (EEZ) off the West Coast, including within the boundaries of the Cordell Bank National Marine Sanctuary.

Krill are fundamental to the trophic structure of marine ecosystems all along the Pacific coast. They are preyed upon by almost all commercially and recreationally important species within the Sanctuaries including, salmon, rockfish, squid, sardine, mackerel and flatfish. In fact, krill is the primary prey of 7 of the 10 most important nearshore commercial fishes on the central California coast.¹ These seven species represented approximately 75% by weight of commercial landings at the central California harbors between 1981 and 2000.² The three Sanctuaries off central and northern California contain several productive upwelling centers that generate high levels of primary production contributing to dense aggregations of krill.³ The oceanographic and bathymetric features of the central coast provide physical habitats that further contribute to krill abundance and degree of aggregation.⁴ This makes the waters within these Sanctuaries a critical feeding ground for countless forms of wildlife besides commercially harvested fish, such as blue whales, other cetaceans, and seabirds. Wildlife viewing is a large and growing activity in all three Sanctuaries. In short, krill is one of the cornerstones of the entire marine ecosystem. Yet, these characteristics of dense available aggregations of krill, also make the Sanctuaries likely targets for the potential of an emerging krill fishery and particularly susceptible to potential adverse effects from such a fishery.

The National Marine Sanctuary Program is mandated to approach resource protection from a broad, ecosystem-based perspective while considering compatible multiple uses of the Sanctuaries. During our Joint Management Plan Review, we detailed the reasons for seeking a prohibition on the harvesting of krill. We believe that the proposed rule addresses these concerns and helps provide for the long term health of the Sanctuaries as well as the ocean ecosystem of the west coast. We commend the Pacific Fisheries Management Council and the NOAA Fisheries Service for their proactive approach that will protect this valuable species.

The Council is an advisory body to the Sanctuary Manager (Superintendent). The opinions and findings of this publication do not necessarily reflect the position of the Cordell Bank National Marine Sanctuary and the National Oceanic and Atmospheric Administration.

Thank you for this opportunity to comment.

Sincerely,

A handwritten signature in black ink that reads "Lance Morgan". The signature is fluid and cursive, with the first name "Lance" and the last name "Morgan" clearly distinguishable.

Lance E. Morgan, Ph.D., Chair
Cordell Bank Sanctuary Advisory Council

¹ Benson, S.R., D. A. Croll, and B. Marinovic. Whales, Krill, and Variability of Two Coastal Upwelling Centers. Quality Review Board Minutes of Meeting 7. Tech. Report No. 01-1. 2001.

² Starr, R.M., Cope, J.M., Kerr, L.A., Trends in Fisheries and Fishery Resources Associated with the Monterey Bay National Marine sanctuary from 1981-2000. California sea Grant Publication No. T-046.

³ Benson, S.R., D. A. Croll, and B. Marinovic. Whales, Krill, and Variability of Two Coastal Upwelling Centers. Quality Review Board Minutes of Meeting 7. Tech. Report No. 01-1. 2001.

⁴ Croll, D.A., B. Marinovic, S. Benson, F.P. Chavez, N. Black, R. Temullo, B.R. Tershy. 2000. From Wind to Whales: Trophic Links in a Coastal Upwelling System. Final Report to the Monterey Bay National Marine Sanctuary, Contract No. 50ABNF500153