

HABITAT COMMITTEE COMMENTS ON
FISHERY MANAGEMENT PLAN AMENDMENT ISSUES

The Habitat Committee (HC) heard a presentation by Dr. Peter Dygert of National Marine Fisheries Service (NMFS) regarding the process for consideration of review and amendment of salmon essential fish habitat (EFH).

The HC supports Option 3. Not only should technical corrections be made and alignment between Endangered Species Act (ESA), critical habitat, and EFH be pursued, but we also strongly support identifying salmon habitat areas of particular concern (HAPC).

Initially, we suggest that areas of overlap between critical habitat and EFH be designated as EFH. We recognize that species for which critical habitat is currently identified represent less than one-third of FMP species, and that additional resources will be needed to pursue HAPC for non-listed species.

We also suggest that NMFS consider designation of kelp and estuary habitats as salmon HAPC, including particular habitat types such as eelgrass and salt marshes.

In addition, watershed councils can provide assistance in identifying important habitat.

We recognize that current resources may not be sufficient to undertake comprehensive review and designation of HAPCs, and the Council should take appropriate actions to seek those resources.

The HC supports a process for intermediate review of EFH when new information becomes available rather than waiting for the five-year review. Especially, we suggest that a process be established to investigate potential status changes for barriers that are currently identified as impassable.

Finally, in implementing updates to the salmon FMP, we recommend identifying non-managed prey species, such as krill, as "forage species" for salmon, and prohibiting their harvest, consistent with other Council action relative to krill.

PFMC
11/02/04