

# PACIFIC FISHERY MANAGEMENT COUNCIL

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December 11, 1996

Mr. Jim Burgess, Acting Director  
Office Of Habitat Conservation  
Attention: Essential Fish Habitat (EFH)  
National Marine Fisheries Service  
1315 East-West Highway  
Silver Spring, Maryland 20910-3282

Dear Mr. Burgess:

The Pacific Fishery Management Council (Pacific Council) would like to provide comments on defining and describing essential fish habitat (EFH) as requested by the National Marine Fisheries Service (NMFS) per the *Federal Register* notice of November 8, 1996.

The Pacific Council has had an active Habitat Committee since 1985. This committee will play an important role in our process of describing and implementing actions with regard to EFH. The committee is presently composed of state, federal and tribal natural resource management agencies (primarily fisheries agencies), as well as commercial and recreational fishing groups and conservation organizations.

The Habitat Committee monitors and provides recommendations to the Pacific Council for resolving fish habitat problems that are applicable to species within our management area. For the past three years, the Pacific Council has published a "Vital Habitat Concerns" document, a watershed-based assessment of some of the most critical habitat issues affecting West Coast marine fish resources (copies enclosed). This report is used to track the progress made in addressing habitat concerns raised by the Pacific Council and to focus attention on unresolved issues. Our efforts in the past five years have been primarily directed toward anadromous salmonid habitat due to the depression of many of these stocks as evidenced by several endangered species listings coastwide.

Our specific comments on Essential Fish Habitat (EFH) follow below.

1. Develop guidelines to assist the fishery management councils in the **description and identification** of essential fish habitat, including adverse impact to EFH in fishery management plans.

There are numerous documents to draw from in describing the habitat requirements of fishes managed by the Pacific Council. For anadromous salmonids, the habitat information database is extensive. However, for deepwater species, such as sablefish (*Anaplopoma fimbria*) and Dover sole (*Microstomus pacificus*), there are large gaps in our knowledge about their habitat requirements.

### **Suggested Actions for the Secretary**

The Magnuson-Stevens Fishery Conservation and Management Act defines EFH as "those waters and substrate necessary to fish for spawning, breeding, feeding and growth to maturity." Any definition and description of EFH must clearly include the corridors used by migratory fish during their life history. For example, in the Columbia River Basin, anadromous fish must negotiate numerous federal and state hydroelectric projects as they migrate between freshwater and the ocean habitat to complete their spawning and rearing activities.

**Use of Peer Reviewed Data:** We suggest that the Secretary guide the councils by requiring that the description and identification of essential fish habitat utilize peer reviewed documents and databases, or university or state and federal natural resource agency publications wherever possible. If adequate information does not exist on a species, then other methods will need to be employed (e.g., fishing industry log book information, unpublished literature, etc.).

**Tools and Databases:** There are numerous newer technological tools for identifying fish habitat such as computer based mapping systems, including GIS, and remote sensing technology such as submersibles and hydro acoustics. There are also advances in database technology such as "StreamNet." StreamNet is a collaborative project among Pacific Northwest agencies and tribes aimed at providing fish and wildlife managers and policy-makers with critical information concerning the region's freshwater aquatic resources, including habitat information for anadromous salmonids.

We suggest the National Marine Fisheries Service work with the councils in identifying the most up-to-date **technological tools** and resources that are available to identify essential fish habitat.

2. Description and identification of **adverse impacts** on EFH, including threats from fishing activity.

**Impact of Fishing Gear:** The Pacific Council is currently collecting information on the impact of fishing gear on EFH. The purpose of this exercise will be to determine:

- 1) What information exists regarding impact of fishing gear on bottom habitat (there has been almost no research on this subject on the West Coast).
- 2) What information needs to be collected.
- 3) What management measures, including gear modifications, have been undertaken to reduce impacts.

### **Suggested Action by the Secretary**

We believe the Secretary of Commerce should be prepared to fund research to clarify the fishing gear related impacts on habitat in West Coast fisheries and that NMFS should assist the councils by developing protocols to be used nationwide for identifying EFH threats. These protocols could include standardization of threat definition and identification of those state, federal and tribal regulatory agencies that are responsible for correcting the adverse impact.

Again, we believe the Secretary should direct that the description and identification of adverse impacts on essential fish habitat, utilize peer reviewed documents and databases, or university or state and federal natural resource agency publications wherever possible.

3. Recommend measures for state and federal actions which will **conserve and enhance EFH.**

The documentation of habitat problems and measures needed to mitigate adverse impacts for anadromous salmonids is extensive. Examples of peer reviewed documents that can be used in identifying EFH adverse impacts on the West Coast include the Northwest Power Planning Council's Independent Scientific Group publication "Return of the River: Restoration of Salmonid Fishes in the Columbia River Ecosystem"; and the Bureau of Land Management/U.S. Forest Service's "Interim Strategies for Managing Anadromous Fish - producing Watersheds in Federal lands in Eastern Oregon, and Washington, Idaho and portions of California [PACFISH]."

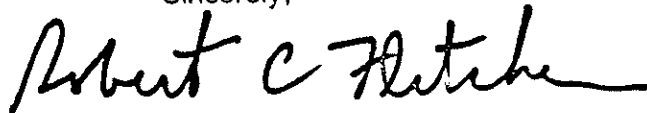
The Pacific Council has frequently recommended measures necessary to conserve and enhance EFH. However, there is little evidence to indicate that these recommendations are given meaningful consideration by state and federal agencies implementing or regulating the adverse habitat actions.

**Suggested Action by the Secretary**

If the councils identify a needed action to protect or restore EFH, it is imperative that NMFS provide sufficient resources (in both administration and budget) to assist the councils in achieving meaningful responses to their concerns.

We appreciate this opportunity to comment on the development of guidelines for EFH. We look forward to working closely with NMFS on this important process.

Sincerely,



Robert C. Fletcher  
Chairman

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Enclosures

c. Regional Councils  
Habitat Committee