



Pacific Fishery Management Council

7700 NE Ambassador Place, Suite 101, Portland, OR 97220-1384
Phone 503-820-2280 | Toll free 866-806-7204 | Fax 503-820-2299 | www.pcouncil.org
Dorothy M. Lowman, Chair | Donald O. McIsaac, Executive Director

May 6, 2014

Buck Sutter
Director, Office of Habitat Conservation
NOAA Fisheries
Office of Habitat Conservation
1315 East West Highway, SSMC3
Silver Spring, MD 20910

Dear Dr. Sutter:

The Pacific Fishery Management Council (Pacific Council) is writing to express its support for establishing a pilot project with fisheries-specific habitat conservation objectives for Pacific Council-managed species on the West Coast.

Despite the Pacific Council's efforts to rebuild depleted stocks, some stocks have shown little improvement. This may be an indication that some life stages may be limited by the quantity of available habitat or the conditions of that habitat. Scientists have yet to fully identify and quantify such relationships or determine the extent to which particular habitats are needed to maintain sustainable fisheries. Developing habitat conservation objectives for habitat-limited species through the pilot project effort proposed by the National Marine Fisheries Service (NMFS) West Coast Region and Fisheries Science Centers is something we believe can elevate the great importance of habitat protection.

The conservation objectives in recovery plans for Endangered Species Act-listed species (e.g. restore 60 percent of tidal delta habitat in the Skagit Delta) are intended to prevent extinction and recover a species to the point where it can be de-listed. However, by design these recovery goals are not intended to return stock abundances to levels that can support targeted fisheries. Developing habitat conservation objectives appropriate to this latter intent have yet to be accomplished.

From the perspective of establishing and designating essential fish habitat (EFH), very little detail is available for most managed species, such that EFH can only be described in the broadest of terms. Developing habitat conservation goals for stocks that contribute to key fisheries can strengthen formal responses to actions that impact EFH and would help focus non-regulatory restoration and conservation efforts.

The Pacific Council's July 2013 Research and Data Needs document identified several high-priority needs (under both EFH and Fishery Ecosystem Plan needs) that a pilot project could directly and immediately address:

- Explore and better define relationships between habitat, especially EFH, and stock productivity. Improved understanding of the mechanisms that influence larval dispersal
-

and recruitment is especially important.

- Specifically identify habitat areas of particular concern: those rare and sensitive habitats that are vulnerable to adverse fishing and non-fishing effects. Identify associated life stages and their distributions, especially for species and life stages with limited information. Develop appropriate protection, restoration, and enhancement measures.
- Assess near-shore distribution of managed species for habitat needs and fishery vulnerability during nursery and pre-reproductive life stages. Characterize the influence of nearshore marine, estuarine, and freshwater water quality on survival, growth, and productivity.

While we are aware of the limited funds available for a West Coast pilot effort, we believe the effort could inform the research items listed above by:

- identifying a few Council-managed species that are limited by the available habitat,
- identifying habitat limited life stages of these species and habitat conservation objectives for each, and
- considering how existing habitat conservation work in the region could align or be focused to meet these objectives.

We anticipate that a pilot project would demonstrate a way to quantify habitat requirements that would directly benefit stock assessment and management. Additionally, this could help the Pacific Council establish habitat objectives for other managed species, in concert with harvest objectives, and identify restoration projects and partnerships to meet those objectives, while providing a template for other regional Council bodies.

The Pacific Council supports NMFS's efforts to conduct a West Coast pilot project to develop habitat conservation objectives towards the goal of achieving and maintaining sustainable fisheries. Please keep us apprised of the process advancing this effort forward and let us know how we may assist this effort. Should you or your staff have any questions on this expression of support, please don't hesitate to contact me or Ms. Jennifer Gilden at the Pacific Council office.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director

JDG:kam

Cc: Brian T. Pawlak
Kara Meckley
Terra Lederhouse
John Stadler
Habitat Committee Members