



Pacific Fishery Management Council

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Marc Gorelnik, Chair | Charles A. Tracy, Executive Director

July 12, 2021

Ms. Carrie Selberg Robinson
Director, Office of Habitat Conservation
NOAA Fisheries
1315 East-West Highway
14th Floor
Silver Spring, MD, 20910

Re: Pacific Fishery Management Council's Support for the Draft NOAA Mitigation Policy for Trust Resources

Dear Ms. Selberg Robinson:

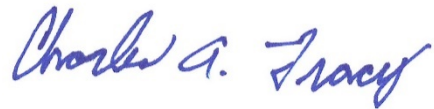
The Pacific Fishery Management Council (Council) is writing to express support for the Draft NOAA Mitigation Policy for Trust Resources (Policy) and recognizes its importance for conserving habitat for inland freshwater salmon habitat as well as oceanic and estuarine habitats along the Pacific Coast. The Council appreciates the approach taken by the Policy and values the effort to standardize the approach to mitigation nationwide. The Policy creates an enhanced level of transparency and represents significant improvements that the Council expects will advance a wide spectrum of mitigation activities.

The Council offers the following suggestions to improve clarity of the Policy and to enhance how some provisions are implemented:

- The Policy introduces the concept of mitigating at the “landscape” and “seascape” scales. These approaches are new concepts on the Pacific Coast, and the Council suggests that the Policy further clarify how those provisions are interpreted.
 - The Policy would also be enhanced by including policies for habitat areas of particular concern that have been identified under NOAA's purview. NOAA's California Eelgrass Mitigation Policy is an example of such policies, which would establish regionally appropriate approaches for developing mitigation ratios and other guidelines that are crucial to ensuring that the mitigation hierarchy is implemented and that mitigation has a high likelihood of success.
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Thank you for the opportunity to comment. Please feel free to reach out to me or my staff with any questions or comments.

Sincerely,



Charles A. Tracy
Executive Director

JDG:kma

cc: Council members
Mr. Lance Hebdon
RFMC Executive Directors