

COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON ESSENTIAL FISH
HABITAT REVIEW – PHASE 2 ACTION PLAN

The Coastal Pelagic Species Advisory Subpanel (CPSAS) discussed the Coastal Pelagic Species Management Team (CPSMT) report ([CPSMT Report 1](#)) under this agenda item. Massive development proposals threaten CPS habitat, survey activities, and fishing access, underscoring the urgent need to complete this essential fish habitat (EFH) review using the best available information and employing new analyses (e.g., dynamic habitat analysis).

We appreciate the work of the CPSMT in completing the EFH Review Phase 1 and their plan for Phase 2. We support the proposed schedule that would bring proposed CPS EFH modifications to the Pacific Fishery Management Council (Council) at the April 2023 Council meeting. For scope and staffing, we have the following recommendations.

We are pleased to see a critical addition to the Phase 2 scope, *Adverse impacts from non-fishing actions*. We recommend a second addition to the scope, entitled “*Actions to conserve CPS EFH.*” As a complementary action, we recommend staff time be added to complete this exercise. These staff could collaborate with the Marine Planning Advisory Committee to ensure the recommended actions for protecting CPS EFH from non-fishing impacts reflect and elevate the Council Policy for Marine Planning.

This addition would further meet the EFH regulatory guidelines which state that, “fishery management plans (FMPs) must identify actions to encourage the conservation and enhancement of EFH, including recommended options to avoid, minimize, or compensate for the adverse effects ... especially in habitat areas of particular concern (HAPCs).” Advisory bodies have already been developing these recommended actions, which include avoidance of HAPCs, and avoidance of significant local and cumulative impacts to hydrological mechanics and ecological regimes.

We support the evaluation of “whether known aggregations or ‘hotspots’ for other CPS species, in addition to market squid, should be considered for HAPCs.” As noted in the Phase 1 report, new studies identified marine canyons as persistent hotspots for krill, and there is enough new information on spawning habitat for sardine and anchovy in their different life stages to update species maps and develop potential HAPCs. If areas qualify as HAPCs, we recommend the CPSMT present these to the Council next year.

Finally, we recommend a representative from the CPSAS be invited to the Phase 2 meetings to ensure our industrial and environmental knowledge is integrated into Phase 2 work products.