COASTAL PELAGIC SPECIES ADVISORY SUBPANEL REPORT ON COASTAL PELAGIC SPECIES ESSENTIAL FISH HABITAT AMENDMENT

The Coastal Pelagic Species Advisory Subpanel (CPSAS) reviewed the Essential Fish Habitat (EFH) Range of Alternatives Report (H.5, Attachment 1) and the Draft EFH Appendix (H.5, Supplemental Attachment 2). As we noted in June 2022, "massive development proposals threaten CPS habitat, survey activities, and fishing access, underscoring the urgent need to complete this EFH review using the best available information and employing new analyses." We appreciate the collaborative efforts of the National Oceanic and Atmospheric Administration's Southwest Fisheries Science Center, Council staff, and the CPS Management Team to develop these alternatives and documents.

For Alternative 1, we recommend 1b as the preliminary preferred alternative (PPA) which would create three categories of EFH for finfish, squid and krill, as well as the proposed EFH configurations including their depths and aerial extents. We also support including in the PPA the recommendations of the Habitat Committee to include the Salish Sea in the definition of EFH for squid and krill (Agenda Item H.5.a, Supplemental HC Report 1). The EFH configurations are well-supported by published information and our knowledge and reflect the desire of the Council to consider the dynamic nature of EFH, embodied in the fact that most CPS, influenced by temperatures, food availability and currents, move throughout the exclusive economic zone (EEZ) and some use coastal bays and estuaries. The thorough analysis integrated satellite and survey data, to include the range of CPS life history features including spawning, seasonal migration, and advection.

A non-fishing impacts section should be included in the EFH Appendix prior to taking final action (as requested by the Council, Habitat Committee, and the CPSAS in June 2022). This section should include general principles guiding the Council and National Marine Fisheries Service in assessing the potential impacts of proposed projects, a list of non-fishing impacts, and a discussion of specific conservation measures that would aid in minimization or avoidance of the adverse effects. In relation to offshore wind energy development, while Kiffney et al. 2022 addresses offshore wind impacts it lacks mention of a major threat to CPS posed by offshore wind: alteration of meteorological and hydrological regimes, currents, and temperatures due to removal and alteration of wind energy in the CCE. This should be documented in the new EFH Appendix.

For Alternative 2, we greatly appreciate the team's exploration of Habitat Areas of Particular Concern (HAPCs), which we requested in 2022, and its presentation of two potential HAPCs for market squid in Monterey Bay and the southern California Bight. The proposed squid HAPCs were selected as being of special importance to support squid spawning and survivorship. However, squid spawn in soft bottom areas throughout the West Coast Exclusive Economic Zone (EEZ) above 1000m depth. Throughout this habitat type, reproductive success and survivorship is linked to environmental conditions and drivers, including temperature and upwelling-driven nutrient production. The CPSAS believes that there was insufficient analysis to support Alternative 2b at this time, and we believe there is insufficient information to support the proposed locations as of special value to spawning over other areas within squid EFH. Therefore, we support Alternative 2a (No Action) as the PPA. To better inform future EFH and HAPC considerations, we encourage

the Council include the following research and data needs: conduct further research on the life cycle of squid and the importance of each stage to the success and productivity of squid. This research should include examining the relative importance of habitat features, as well as environmental and oceanic conditions at each life cycle stage.

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