



Pacific Fishery Management Council

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Pete Hassemer, Chair | Merrick J. Burden, Executive Director

February 13, 2026

Jennifer Quan, Regional Administrator
National Marine Fisheries Service, West Coast Region
501 West Ocean Blvd.
Long Beach, CA 90802-4213

RE: Pacific Fishery Management Council Coastal Pelagic Species Fishery Management Plan
Amendment 22 – Essential Fish Habitat

Dear Ms. Quan:

This letter transmits the Pacific Fishery Management Council’s (Council) Coastal Pelagic Species (CPS) Fishery Management Plan (FMP) Amendment 22, incorporating modifications based on the recent review of CPS essential fish habitat (EFH). In accordance with the Magnuson-Stevens Fishery Conservation and Management Act (MSA), FMPs must “describe and identify essential fish habitat for the fishery based on the guidelines established by the Secretary under section 305(b)(1)(A), minimize to the extent practicable adverse effects on such habitat caused by fishing, and identify other actions to encourage the conservation and enhancement of such habitat” (16 U.S.C. 1853(7)). The MSA defines EFH as “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity” (16 U.S.C. 1802(10)) and notes EFH identifications should be updated based on new scientific evidence or other relevant information (16 U.S.C. 1855 (b)(1)(A)). The Council took final action at its June 2023 meeting, approving the proposed EFH modifications. These modifications are contained in revised FMP text (Attachment 1) and a revised CPS EFH Appendix D (Attachment 2), which contains EFH descriptions and identification, CPS life histories, information on fishing and non-fishing impacts, maps, research needs, and other information. This letter constitutes the Council’s formal recommendation to the National Marine Fisheries Service (NMFS) to approve Amendment 22 to the CPS FMP, including the revised Appendix D. Please note that the proposed amendment language also incorporates the revised rebuilding plan implemented as part of CPS FMP Amendment 23, approved by NMFS in May, 2025.

The Council initiated the review in 2020, establishing a team to coordinate the review of new and newly available information related to CPS EFH. The team included participants from the Council’s CPS Management Team (CPSMT), Council staff, and NMFS West Coast Region and Southwest Fisheries Science Center (SWFSC). No substantial changes were made to krill EFH, finfish EFH, or fishing impacts and conservation measures. A summary of key modifications and considerations is described below.

CPS Species Groupings

The EFH regulatory guidance states that “*EFH must be designated for each managed species, but, where appropriate, may be designated for assemblages of species or life stages that have similar habitat needs and requirements*” 50 CFR 600.815(a)(1)(iv)(E). Previously, CPS finfish and market squid were grouped together, sharing the same EFH geographic extent, and krill species were grouped separately. Based on distinctly different life histories, distributions, and the fact that market squid are dependent on benthic habitats for part of their life history (finfish are not), market squid EFH is proposed to be described separately from the finfish complex. The scientific rationale for designating EFH separately for CPS finfish and market squid, as well as detailed life history descriptions are described in the Appendix D (Attachment 2).

Two krill species (*Euphausia pacifica* and *Thysanoessa spinifera*) are widely distributed north to south in the California Current Ecosystem (CCE), and most abundant in continental shelf and slope waters. They are described individually because there is substantial information on their distribution, habitat associations, and life history. In addition, their distributions are generally inclusive of the distributions of the other krill species present in the CCE. EFH for the rest of the krill species (“other krill”) is described separately. All krill species present in U.S. West Coast waters are included in the CPS FMP, which has specifically identified six krill species in addition to *E. pacifica* and *T. Spinifera*. This proposed FMP amendment includes three additional krill species to be added to the list of “other krill” *T. inspinata*, *Stylocheiron affine*, and *E. hemigibba*. Information on the distribution, life history, and other information on all nine “other krill” species is included in Appendix D. Table 1 shows the proposed grouping of CPS finfish, market squid, and krill separately.

Table 1: CPS EFH Proposed Species Groupings

Common Name	Scientific Name
Finfish	
Pacific sardine (northern subpopulation)	<i>Sardinops sagax</i>
Pacific (chub) mackerel	<i>Scomber japonicus</i>
Northern anchovy (central and northern subpopulations)	<i>Engraulis mordax</i>
Jack mackerel	<i>Trachurus symmetricus</i>
Market squid	<i>Doryteuthis opalescens</i>
Krill or Euphausiids (Including all species in West Coast EEZ. First two species are common and are most likely to be targeted by fishing)	
<i>Euphausia pacifica</i>	
<i>Thysanoessa spinifera</i>	

<p>Other krill (includes all krill species in the West Coast EEZ other than <i>E. pacifica</i> and <i>T. spinifera</i>. Nine species are listed here.)</p>	<p><i>Nyctiphanes simplex</i> <i>Nematocelis difficilis</i> <i>T. gregaria</i> <i>E. recurva</i> <i>E. gibboides</i> <i>E. eximia</i> <i>T. inspinata</i> <i>Stylocheiron affine</i> <i>E. hemigibba</i></p>
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EFH Description and Identification, and Life History Summaries

Updates to the EFH descriptions, identification, and life history summaries for species in the CPS FMP are included in the proposed amendment and Appendix D. These are based on a detailed literature review and summary completed by the SWFSC. Information on market squid was augmented, particularly regarding dependence on benthic habitats during spawning and egg development.

Geographic Range, Maps, and Species Distribution

The geographic ranges for CPS finfish and krill EFH remain as described previously (see Appendix D). The geographic range of EFH for market squid had to be determined separately for the first time. Although market squid can be found throughout U.S. West Coast waters, the distribution probability is much greater nearer to shore. The east-west geographic boundary of market squid EFH is defined to be from the shoreline seaward to the extent of the 5.8 percent market squid distribution probability, including the Salish Sea/Puget Sound, but not including other West Coast estuaries. Detailed descriptions of the distribution and geographic ranges for all CPS are included in the Appendix D (Attachment 2), which also includes updated maps for each species grouping.

Non-Fishing Impacts and Conservation and Enhancement Measures

FMPs must identify non-fishing activities that have the potential to adversely affect EFH quantity or quality. FMPs must also describe options to avoid, minimize, or compensate for the adverse effects and promote the conservation and enhancement of EFH. The existing list of non-fishing impacts and conservation measures (described in the CPS FMP) that could adversely affect CPS EFH is still applicable and relevant. A more recent publication by Kiffney et al. (2022) provides a comprehensive description of numerous additional non-fishing activities that may adversely affect CPS EFH, as well as associated, general conservation measures, and an extensive list of relevant publications. These additional activities are applicable to other Federally managed species in addition to CPS, and therefore not all those identified in Kiffney et al. (2022) will apply to CPS. Nonetheless, the publication is considered a very reliable recent compendium of potential non-fishing activities and is incorporated by reference into the CPS FMP.

Research and Information Needs

The EFH regulations state that FMPs should identify research and information (R&I) needs for “research efforts that the Councils and NMFS view as necessary to improve upon the description and identification of EFH, the identification of threats to EFH from fishing and other activities, and the development of conservation and enhancement measures for EFH” (50 CFR

600.815(a)(9)). The proposed amendment includes updated R&I needs that emphasize research on fishing effects, oceanographic conditions, the dynamic nature of CPS habitat, and the potential for habitat areas of particular concern (HAPC).

Habitat Areas of Particular Concern

The EFH regulations encourage the Councils to identify specific types or discrete areas of habitat within EFH as HAPCs (50 CFR 600.815(a)(8)), based on one or more of the following considerations:

1. the importance of the ecological function provided by the habitat.
2. the extent to which the habitat is sensitive to human-induced environmental degradation.
3. whether, and to what extent, development activities are, or will be, stressing the habitat type.
4. the rarity of the habitat type.

The intended goal of identifying such habitats as HAPCs is to provide additional focus for conservation efforts. While the HAPC designation does not add any specific regulatory process, it highlights certain habitat types as ecologically very important.

At its April 2023 meeting, the Council considered a potential HAPC for market squid that would include areas within the Southern California Bight (SCB) and possibly Monterey Bay with sand or mud benthic habitat within a depth range of 13 – 93m. Spawning behavior for market squid is typically dictated by temperature, occurring in relatively shallow nearshore areas with sandy or mud substrates and can include deeper waters along submarine canyon sides. Fishery-dependent data indicate routine and prolific spawning areas in the SCB and, to a lesser extent, off Monterey Bay. Although squid are known to spawn in areas further north (northern California Coast and off Oregon), market squid presence and spawning is much more sporadic there than in areas off Monterey and the SCB. Noting that squid spawning occurs throughout the California Current Ecosystem, is not limited to the areas encompassed by the proposed HAPCs, and that there is a lack of sufficient information on which to base HAPCs, the Council concluded that a market squid HAPC is not warranted at this time.

New Regulations and Management Measures

There were no management measures proposed as part of this action, and no regulations are necessary to implement the proposed changes. In addition, CPS EFH descriptions are not codified in the Code of Federal Regulations. Therefore, the regulatory deeming process is not necessary.

In addition to the modifications and considerations described in this transmittal letter, we note that CPS EFH information is now consolidated into a revised CPS FMP Appendix D, including EFH for krill, which was described in Amendment 12 but not included in FMP text or Appendix D. In addition, numerous new references have been included in the citations.

We appreciate the participation and support of the NMFS WCR and the SWFSC during this EFH review and revision process. Please contact Mr. Kerry Griffin (kerry.griffin@pcouncil.org) of Council Staff with any questions about the transmittal or implementation of this FMP amendment.

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Sincerely,

A handwritten signature in black ink, appearing to read "Merrick J. Burden", is written over a light-colored rectangular background.

Merrick J. Burden
Executive Director

KFG:acl

Enclosures: Attachment 1: Proposed CPS FMP Amendment 22 text in underline/strikethrough
Attachment 2: Proposed Revised CPS FMP Appendix D to the CPS FMP:
Essential Fish Habitat

cc: Pacific Council Members
Laura Gray
Eric Chavez