



**World Wildlife Fund-US**

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December 2, 2014

Chair Dan Hull  
North Pacific Fishery Management Council  
605 W. 4th Avenue, Suite 306  
Anchorage, Alaska 99501

RE: Pribilof Canyon Corals: Agenda Item D-3

Dear Mr. Hull and Council members:

Thank you for the opportunity to provide comments on the range of alternatives that should be considered with respect to Pribilof Canyon and Corals. World Wildlife Fund (WWF) believes that any suite of alternatives to protect canyon habitat, corals, sponges and benthic organisms should be developed within the context of the eastern Bering Sea ecoregion. Therefore the agenda item title "Pribilof Canyon Corals" is unnecessarily limiting. Development of alternatives should be broadened so that the public and the Council can consider a range of protections for any or all of the five known shelf-break canyons as well as corals, sea whips and sponges located in the Bering Sea shelf break and slope area both inter and intra-canyon.

Preliminary results from the Alaska Fishery Science Center's camera survey, as presented to the Council in October 2014, showed corals, sea whips and sponges occurring in various densities within canyons, between canyons, and on the outer shelf. Although the camera survey may have confirmed that corals and sponges (but not sea whips) occur in low densities does not mean that they are not important benthic features that provide habitat for marine organisms, including commercially valuable fish.

I encourage the Council to take a wider, ecosystem focused approach to the question of whether benthic and pelagic habitat protection in the Bering Sea shelf break and slope area is currently adequate for ensuring resilience, biodiversity and productivity. Recently, WWF conducted a Rapid Assessment of Circum-Arctic Ecosystem Resilience (RACER) in the Bering, Chukchi and Beaufort Seas. RACER is a tool for finding and mapping the sources of ecological resilience that help keep ecosystems functioning and identifying them as targets for conservation and management efforts. The goal of our RACER analysis was to identify key features where important ecosystem drivers will continue to support places with exceptional ecological vitality that confer resilience to Bering Sea and Arctic ecosystems, both now and in a climate-affected future.

WWF identified eleven key features in the Bering Sea that are main drivers of productivity and diversity, and are likely to remain so in the future. Two areas related to this agenda item were identified as persistently fostering *high* productivity and diversity: Pribilof Domain and the Continental Shelf Break and Slope (which contains the Bering Submarine Canyons and Bering Sea Greenbelt High Productivity Area). There is an absence of habitat protections in both of these areas, which is concerning given their ecological importance today and in the future.



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I encourage the Council to broadly scope the range of alternatives for protection of shelf break and slope habitat so that important areas are not prematurely cut out of consideration. Thank you for the opportunity to comment.

Sincerely,

Heather Brandon  
Senior Fisheries Officer  
WWF US – Arctic Field Program