AGENDA D-3(c,d,e)
FEBRUARY 2010

MEMORANDUM

TO: Council, SSC and AP Members

FROM: Chris Oliver
Executive Director

ESTIMATED TIME
8 HOURS
(all D-3 items)

DATE: February 2, 2010

SUBJECT: Miscellaneous Issues – EFH and HAPC

ACTION REQUIRED

(c) Review preliminary EFH report (SSC only)
(d) Review and adopt HAPC criteria and schedule } sign up sheet
(e) Report and action as necessary on the AI FEP addendum

BACKGROUND

(c) Review preliminary EFH report (SSC only)

The EFH Final Rule and each of the Council's FMPs require that a review of EFH components be completed every 5 years. The Final Rule provides guidance that EFH provisions be revised or amended on this timeline, as warranted, based on available information. There are ten EFH components that are included in each of the Council's FMPs, and any change to text of the FMP requires a formal FMP amendment. The ten components are: (1) EFH descriptions and identification; (2) Fishing activities that may adversely affect EFH; (3) Non-Magnuson-Stevens Act fishing activities that may adversely affect EFH; (4) Non-fishing activities that may adversely affect EFH; (5) Cumulative impacts analysis; (6) EFH conservation and enhancement recommendations; (7) Prey species list; (8) HAPC identification; (9) Research and information needs; and (10) Review EFH every 5 years.

A preliminary summary report of the EFH 5-year review for 2010 was reviewed by the AP and the Council at the December 2009 Council meeting. The preliminary report includes reviews of the individual species EFH information by the groundfish stock assessment authors, as well as the review of the non-fishing activities that impact EFH. A revised preliminary draft was mailed to the SSC and made available on the Council website in mid-January, which includes information on the review of fishing effects on EFH. The sections containing the individual species reviews for crab, scallop, and salmon species will be added to the final report, once the Crab and Scallop Plan Teams have had an opportunity to review the author contributions.

Under the current timeline, the report will be finalized in March 2010, and distributed to the Council and the public. The Council will then decide whether any of the new information highlighted in the review warrants initiating FMP amendments to revise EFH descriptions and recommendations in the Council FMPs. It is anticipated that the Council will make these decisions at the April 2010 meeting, once the report is complete.

(d) Review and adopt HAPC criteria and schedule

Under the Council's existing Habitat Areas of Particular Concern identification process, the Council will periodically issue a call for proposals for candidate areas that encompass specific, priority habitat types to be identified as HAPC. The sites proposed under this process are then sent to the Plan Teams for scientific review to determine whether they have ecological merit, and are also reviewed for socioeconomic and management and enforcement impacts. During the last HAPC proposal cycle, in 2003-2004, the Council received feedback from the public and the Plan Teams criticizing the criteria established to evaluate the HAPC site proposals. The Council has asked the SSC to revise the criteria.

In April 2009, the SSC created a workgroup, comprising SSC and Plan Team members, and staff, led by Sandra Lowe (GOA Groundfish Plan Team). Item D-3(d)(1) is a working document that summarizes the proposal evaluation criteria used in the 2004 HAPC process, concerns about the 2004 criteria expressed by the Joint Plan Teams and the SSC, and proposed revisions to the criteria. The SSC reviewed the working document in October 2009, and deferred final recommendations on the criteria until this meeting.

The Council is scheduled to adopt criteria to be used for evaluating HAPC proposals at this meeting. In April, the Council will be considering whether to set new HAPC priorities, which would initiate a new call for proposals on HAPC candidate sites. Should the Council proceed with a new HAPC proposal cycle in April, there are multiple timelines under which a HAPC proposal cycle could proceed, two of which are described below. Should the Council wish to proceed with the shorter timeline, the Council may wish to alert the public of this at this meeting.

Steps in the HAPC process	Timeline A (shortest possible)	Timeline B
Council sets HAPC priorities	April 2010	April 2010
Prepare and issue call for proposals; proposal period open	April 20-May 25 (5 weeks)	May 3-July 26 (12 weeks)
Initial screening of proposals for adherence to priorities; Council selects proposals to go forward for review	June 2010	October 2010
Socioeconomic and enforcement review of proposals by staff	June-July	October-November
Plan Team review of proposals for ecological merit	early September	January 2011
Council decision on whether to formulate proposals into an amendment analysis	October 2010	February 2011
Initial review of amendment analysis	December 2010	April 2011
Final action on amendment analysis	February 2011	June 2011

(e) Report and action as necessary on the AI FEP addendum

The Council's Aleutian Islands Ecosystem Team met January 27-28, 2010, in Seattle. The Team reviewed new information about the AI, and discussed future directions for the FEP and the Team. The Team proposed developing Terms of Reference for the Team, and also a plan for updating the FEP. During the final afternoon, the Team met jointly with the Ecosystem Committee to discuss their suggestions and recommendations. The Team's report is attached as Item D-3(e)(1).

The Ecosystem Committee generally agreed with the direction and schedule suggested by the Team for further work. Additionally, the Committee made recommendations to the Council on the national Coastal and Marine Spatial Planning framework that is currently out for public comment. The Committee's minutes are attached as Item D-3(e)(2).

Draft working document of SSC/Plan Team workgroup to refine the HAPC proposal rating criteria

Context

Essential Fish Habitat (EFH) provisions provide a means for the Council to indentify HAPCs [50 CFR 600.815(a)(8)] within Fishery Management Plans (FMPs). HAPCs are those areas of special importance that may require additional protection from adverse effects. 50 CFR 600.815(a)(8) provides that FMPs should identify specific types or areas of habitat within EFH as habitat areas of particular concern based on one or more of the following considerations:

(i) The importance of the ecological function provided by the habitat.

(ii) The extent to which the habitat is sensitive to human-induced environmental degradation.

(iii) Whether, and to what extent, development activities are, or will be, stressing the habitat type.

(iv) The rarity of the habitat type.

The NPFMC HAPC process is initiated by a public call for HAPC sites that address a specific priority set by the Council. The previous Council HAPC identification process (which occurred in 2004) focused on two specific priority areas:

1. Seamounts in the exclusive economic zone (EEZ), named on National Oceanic and Atmospheric Administration (NOAA) charts, that provide important habitat for managed species.
2. Largely undisturbed, high-relief, long-lived hard coral beds, with particular emphasis on those located in the Aleutian Islands, which provide habitat for life stages of rockfish or other important managed species.

Additionally, nominations were to be based on best available scientific information and included the following features:

1. Sites must have likely or documented presence of Fishery Management Plan (FMP) rockfish species.
2. Sites must be largely undisturbed and occur outside core fishing areas.

The 2004 HAPC process resulted in the designation of Bowers Ridge HAPC, Alaska Seamount HAPCs, and GOA coral HAPCs.

2004 proposal evaluation criteria

Based on the four considerations listed above, the Plan Teams evaluated HAPC proposals using the following criteria:

Score	Local Rarity	Ecological Importance	Sensitivity	Stressed
EFH Final Rule:	*The rarity of the habitat type.*	*The importance of the ecological function provided by the habitat*	*The extent to which the habitat is sensitive to human induced environmental degradation.*	*Whether and to what extent development activities are or will be stressing the habitat type.*
1	Habitat common throughout the Alaska region: Bering Sea, Gulf of Alaska, and Aleutian Islands	Habitat is featureless or unknown; fish are present; reproductive associations with the habitat do not exist	Habitat or structure less sensitive	Habitat is exposed to routine fishing disturbance or natural perturbation
2	Habitat common in one of the Alaska regions, and occurs with less frequency in one or both of the others	Habitat exhibits some structure; fish are present within known substrates; habitat or reproductive associations may exist	Habitat or structure somewhat sensitive	Habitat is exposed to occasional fishing disturbance or natural perturbation
3	Habitat is common in only one of the Alaska regions	Habitat consists of highly diverse or vertical structure; substrate is notable; vulnerable life history stages of fish or habitat reproductive associations exist	Habitat or structure highly sensitive	Habitat is exposed to little or no fishing disturbance or natural perturbation

The following concerns were raised by the Plan Teams and the SSC as a result of the 2004 HAPC process.

General concerns with 2004 evaluation criteria:

1) *Concern*: The proposals deal with habitat *areas*, but the criteria deal only with habitat *types*. This tends to generate a mismatch between the data provided in the proposal and the data required for completion of the tables. For example, a proposal might provide data showing that a given habitat *area* is "stressed" without mentioning whether the habitat *type* in general is similarly stressed. A related problem has to do with homogeneity of habitat type within a proposed area. If a proposed area encompasses more than one habitat type, the ratings in the tables become difficult to interpret. A more precise description defining the meaning of habitat area and habitat type for the purpose of this analysis is needed.

2) *Concern*: The ratings in the tables may imply a greater degree of precision than is warranted by the available data. For example, a rating of 3 under one category should not necessarily be interpreted as carrying the same weight as a rating of 3 under another category. Similarly, a rating of 3 should not necessarily be interpreted as carrying three times the weight as a rating of 1, even under the same category.

3) *Concern*: An evaluation of the level of data utilized in the proposal as well as the level of scientific uncertainty inherent in that data would be useful in this review.

4) *Concern*: Citations should be submitted in full for these proposals such that reviewers could pursue these citations if necessary to evaluate their relevance. Grey literature should be accessible and would assist reviewers.

5) *Concern*: The Teams struggled with the notion in many proposals that HAPC sites that lack information should be designated HAPC *first*, and then evaluated for refinements and further research to determine if the designation was appropriate.

Specific Concerns Relative to the 4 Considerations (Local Rarity, Ecological Importance, Sensitivity, Stressed)

Under each of these considerations specific concerns with the definitions and/or criteria indentified in the last HAPC process are listed.

Local Rarity

6) *Concern*: The usage of the word "common" in the locally rare criteria presents conflicts for interpretation.

7) *Concern*: Under "local rarity," the criteria for ratings of 2 and 3 are logically equivalent.

Ecological Importance

8) *Concern*: Refinement of the current definition or interpretation of Ecological Importance which is "The importance of the ecological function provided by the habitat". The following definition was put forward for discussion: "Ecological Importance is species habitat dependency to reproduce or rear young. (Ecological Importance is not to be all waters or substrates.)". Note: because the definitions are in the EFH final rule, it is not clear that we can change the definition, but we can refine our interpretations.

9) *Concern*: Under "ecological importance," multiple criteria are presented for each rating, making it difficult to assign a rating if some criteria are met while others are not.

Sensitivity and Stressed

(These 2 considerations are related and are addressed together)

10) *Concern*: A higher level of fishing pressure implies a lower "stressed" rating.

11) *Concern*: The definition of "stress" was particularly troubling for the Plan Teams. The Plan Teams interpreted "stress" to be a measure of "relative disturbance". If disturbance is interpreted as density of bottom contact fishing, then an effort must be made to numerically evaluate effort by gear for each site in contrast to the spatial distribution of the fishery overall. The SSC recommends that the definition for "stress" include a consideration of the frequency of disturbance, habitat recovery time and how natural and human disturbances influence habitat form and function. A kelp forest, for example, is subject to natural perturbation from storms and biota has adapted to a relatively fast regeneration time in contrast to slow growing corals found in deeper waters.

The SSC has requested further definition of item iii on page 1 of this document: "(iii) Whether, and to what extent, development activities are, or will be, stressing the habitat type. Specifically the SSC requests information from the definitions provided in the EFH rule and guidelines on the definition of "development" and whether fishing or non-fishing impacts or both were intended to be the focus.

12) *Concern*: Under "stressed," the criteria for ratings of 1 and 2 are expressed in different dimensions (i.e., the criterion for a rating of 2 is expressed in terms of *frequency* of fishing whereas the criterion for a rating of 1 is expressed in terms of *regularity* of fishing).

13) *Concern*: Given the above concerns (4-6), it is clear that a great deal of refinement and clarification of the criteria for "Sensitivity" is needed. This is a broad category which makes it unwieldy for reviewers.

Proposed revisions to the proposal evaluation criteria

The work group proposes the following revised HAPC Criteria Scoring Table as a means to address many of the concerns listed above, to the extent practical.

Factor →	**Rarity**	**Ecological Importance**	**Sensitivity**	**Level of Disturbance** (applicable to activities other than fishing)
EFH Final Rule Consideration	*The rarity of the habitat type.*	*The importance of the ecological function provided by the habitat*	*The extent to which the habitat is sensitive to human induced environmental degradation*	*Whether and to what extent development activities are or will be stressing the habitat type*
Score 0	Habitat[1] common throughout the Alaska regions: Gulf of Alaska, Bering Sea, Aleutian Islands, and Arctic.	Habitat does not provide any ecological associations[2].	Habitat resilient (not sensitive).	Habitat not subject to developmental stress.
1	Habitat less frequent and occurs to some extent in 2 or more regions.	Habitat provides little structure[3] or refugia. Foraging and spawning areas do not exist.	Habitat somewhat sensitive and quickly recovers; 1- 5 years. Effects considered temporary.	Habitat is or will be exposed to minimal disturbance from development.
2	Habitat unique, less frequent, and occurs to some extent in 1 or 2 regions.	Habitat exhibits structure and provides refugia or substrates for spawning and foraging.	Habitat sensitive and recovery is within 10 years. Effects considered temporary, however may be more than minimal.	Habitat is or will be stressed by activities. Short term effects evident.
3	Habitat unique and occurs in discrete areas within only one region.	Complex habitat condition and substrate serve as a refugia, concentrate prey, and/or are known to be important for spawning.	Habitat is highly sensitive and slow to recover; exceeds 10's of years. Effects will persist and more than minimal.	Habitat is or will be severely stressed or disturbed by development. Cumulative impacts require consideration from long term effects.

[1] Habitat includes living (infauna, epifauna, megafauna, etc.) and non-living substrate (rock, cobble, gravel, sand, mud, silt, etc.).
[2] Ecological associations are those associations where the habitat provides for reproductive traits (i.e. spawning and rearing aggregations) and foraging areas; areas necessary for survival of the species. Associations include habitat complexity (features, structures, etc.) and habitat associations (provide refugia, spawning substrates, concentrate prey, etc.). Ecological importance is not to be applied across all waters or substrates.
3 'Structure' refers to three-dimensional structure.

Data Certainty Factor

The Data Certainty Factor (DCF) determines the level of information known to describe and assess the HAPC. The DCF is used to determine if information is adequate prior to taking further action. Thus, a HAPC proposal with a high criteria score and a low DCF is to be highlighted (flagged) as a potential candidate for HAPC and for further consideration as a research priority. The DCFs are color coded according to their weight to provide a visual way of informing the criteria scores, i.e., proposal scores with a DCF of 3 are color coded green, scores with a DCF of 2 are color coded yellow, and scores with a DCF of 1 are color coded red

Weight	Data Certainty
3	Site-specific habitat information is available.
2	Habitat information can be inferred or proxy conditions allow for information to be reliable.
	Habitat information does not exist; neither by inference or proxy.

HAPC Proposal Rank

HAPC ranking formula provides a color coded score (sum of criteria scores) to further the proposal along within the immediate HAPC Process. A high ranked HAPC with a DCF of 3 (score color coded green) has a high criteria score and information exists to assess the site.

HAPC Proposal Rank = Additive HAPC Criteria Score supplemented with Data Certainty Factor

Example evaluation of HAPC proposals:

HAPC Evaluation	Proposal A	Proposal B	Proposal C
Rarity	0	2	3
Ecological Importance	2	1	3
Sensitivity	2	3	3
Stress	n/a	n/a	2
Criteria Total(+)	4	6	11
Data Certainty Factor	3	3	
HAPC Proposal Rank (=)	4	6	
Research Priority Flag			

The top scoring proposals within each color category could then be forwarded for further consideration with the additional information that red high criteria scores may warrant consideration as a research priority and may not be an appropriate candidate for HAPC until further research is conducted.

AI Ecosystem Team

January 27-28, 2010
AFSC, Seattle, WA

DRAFT MEETING REPORT

Team members:

Kerim Aydin	Sandra Lowe
Steve Barbeaux	John Olson
Forrest Bowers	Jennifer Sepez
Diana Evans	Paul Spencer
Sarah Gaichas	Francis Wiese
Carol Ladd	

Absent: Tom Gelatt

Others participating: Jason Anderson, Dave Fraser, Ivonne Ortiz, Jon Warrenchuk, Stephanie Zador

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The Team met all day on Wednesday, January 27, and during the morning and early afternoon of the following day. From 2pm on Thursday, January 28, the Team met jointly with the Council's Ecosystem Committee, in order to discuss with the Committee further action on the FEP. The Team prepared a short handout of comments for the Ecosystem Committee, which are included as the final section of this report. The Team's discussions with the Ecosystem Committee are captured separately in the Ecosystem Committee's minutes from the January 28th meeting.

Team membership

Since the Team last met, there have been some alterations to the composition of the Team. A marine mammal expert, Dr Tom Gelatt, has been appointed to the Team, although he was not able to be present at this meeting. Also Dr Vernon Byrd, seabird expert from the US Fish and Wildlife Service, has retired from the Team. A replacement from USFWS has been proposed, Dr David Irons, who is interested in joining the Team. He also was unable to attend this meeting, but will hopefully be appointed to the Team in the future.

New information on the Aleutian Islands

During the first day of the workshop, the Team heard reports on new information available on the Aleutian Islands ecosystem. A list of the presentations is included below. The Team discussed that much of the new information presented would be useful to add to the FEP, and Ms Evans will write up and circulate a synthesis of the new information presented, and how/where it could be added to the FEP based on the Team discussions.

- Council and other agency actions with respect to the AI, updates from the Alaska Marine Ecosystem Forum — *Diana Evans*
- Update on AI groundfish species — *Sandra Lowe*
- Report on cooperative research acoustic study in the AI — *Steve Barbeaux*
- Population trends for Steller sea lions, harbor seals, N fur seals, whales — *Rolf Ream*
- Update on Adak and Atka fisheries and plants — *Nicole Kimball (teleconference)*
- State-managed fishery activity — *Forrest Bowers*
- Information from the EFH review (including fishing intensity analysis) — *John Olson*

- Update on non-target initiatives, changes to AI spatial management *Paul Spencer*
- Update on communities, processing workforce project *Jennifer Sepez*
- Physical oceanography and climate information *Carol Ladd*
- Update to the AI ecosystem model, AI ecosystem assessment, tracking indicators in the Ecosystem SAFE *Sarah Gaichas/Kerim Aydin*
- AI research and funding of proposals at NPRB *Francis Wiese*

Discussion of future direction for the FEP and AIET

During the second day of the meeting, the Team discussed how to expand the utility of the FEP. The Team agreed that the FEP should be updated, both with the new information discussed during the first day, and also to capture the extensive review of interactions and indicators that was undertaken at the last Team meeting, in September 2008.

The Team had extensive discussions about how to make the FEP more useful as a tool in the management process. Various examples were identified where information from the FEP has proven useful in supporting management actions, but in most cases this is because one or more team members were involved in the relevant action. For example, information from the FEP was presented to the SSC during their discussions of whether to separate Bering Sea and Aleutian Islands Pacific cod harvest specifications. A more current example was the use of FEP ecosystem information in assessing the BSAI blackspotted and rougheye rockfish complex. It was felt that the FEP needs to be highlighted to other people in the management process, including but not limited to the BSAI Groundfish Plan Team, who could benefit from the information available in the document. It was also noted that a continued effort needs to be made to highlight the FEP's primary conclusion, that the Aleutian Islands is a separate ecosystem from the Bering Sea, which some Team members felt was still not given sufficient weight in all quarters of the management process.

The Team considered various ways in which to increase the utility of the FEP as a management tool for actions relating to the Aleutian Islands. This also led to a discussion of what the role of the FEP team should be in support of the FEP and its utility. It was concluded Team's role, as currently set up, is to help provide information on the AI ecosystem that can provide context for management actions affecting the Aleutian Islands. This does not mean that the Team should, for example, provide advice on each specific Council issue that affects the Aleutian Islands. However, it may be helpful to identify a framework or series of steps for using the AI FEP, which could be helpful to others in their management actions. The Team considered that the best way to illustrate this utility might be to identify one or more case studies, instances of management actions that are being considered, where the use of FEP information could inform the action. For example, it was suggested that it may be helpful for the Crab and Groundfish Plan Teams to specify an Aleutian Islands portion of their meetings, during which all Aleutian Island stock assessments are considered together, and an Ecosystem Assessment presentation can be focused specifically on the AI.

The Team also discussed at what level of the management process the AI FEP is intended to be used. Examples of the various levels include incorporating information into stock assessments, or Council analyses, and AI ecosystem considerations by the Council Plan Teams (Crab and BSAI Groundfish), and also by the SSC, AP and Council. The Team noted that it would be most beneficial if the information is incorporated early in the process, and not just at the Council level.

In order to address some of these many questions, the Team recommends that a Terms of Reference be developed for the AIET, which should also address the purpose of the FEP and how it is intended to be used within the management process. The Council's previous direction to the Team was focused on the

development of the FEP; now that it is in place and approved, it seems appropriate to revisit what the purpose of the Team and the FEP should be, and articulate that purpose. The Team did not have time to write out a formal draft for discussion with the Ecosystem Committee or consideration by the Council, but rather suggests that such a draft be prepared via email during the next month, and discussed at the April Council meeting.

The Team also suggests that it may be timely to provide a presentation to the Council that addresses not only the proposed updates to the FEP, but also an effective 'State of the Aleutian Islands ecosystem' report, based on the FEP interactions and indicators. While some of this information is presented annually in the Ecosystem SAFE report, and it is certainly intended and appropriate that the tracking of this information should occur in that format, it was also felt by the Team that a presentation focused just on the AI might be appropriate. The Council has never seen the FEP interactions presented alongside the ecosystem indicator information that are designed to track those interactions, and the annual indicator presentation is always for the Bering Sea, GOA and Aleutian Islands combined, during which the AI ecosystem (on which there is the least data) is more likely to get lost. The Team suggested timing the presentation for February 2011, as hopefully the AI trawl survey will occur this summer, and this would allow information from the survey to be processed and included in the report. The fall is a busy time period for both stock assessment authors and the Council, so the February agenda may be a little easier for scheduling. Also, the February 2011 meeting is in Seattle, and as many of the AIET members are Seattle-based, this would be a good opportunity for them to participate in the presentation.

Finally, the Team also discussed how to prioritize among some of the longer-term projects for further work on the FEP, some of which were identified in the FEP itself, and others of which have been suggested by the Team members. These projects are listed in the 'Comments for the Ecosystem Committee' section at the end of this report. Ms Gaichas and Mr Aydin asked for input on priorities for further work on the AI ecosystem model and the AI ecosystem assessment. Mr Wiese asked for input on how to frame research priorities for the AI in such a way as to attract proposals. The Team continued their discussion of the use of visual tools, such as the Australian star diagrams, as a way to present ecosystem policy tradeoffs in a way that is intuitive and useful to the Council. The Team concluded that it would be helpful to have input from the Ecosystem Committee and the Council about priorities for future work on the FEP; this might be a consideration that could be raised during the discussion of Terms of Reference.

Plan for AIET work

Assuming that the Ecosystem Committee and Council generally approve of the direction the Team proposes to follow, the Team agreed to the following plans for upcoming work.

Prepare a Terms of Reference for approval by the Council

The Team agreed to work via email to prepare a draft Terms of Reference for the AIET, which would also address the purpose of the FEP, and what the relationship of the FEP and the Team is intended to be with other aspects of the Council management process. The Team would propose to have a draft TOR ready for discussion by the Ecosystem Committee and the Council at the April Council meeting.

Updates to the FEP

The Team agreed to revise and update the December 2007 FEP. As occurred during the development of the FEP, each Team member will be responsible for revising one or multiple sections in the document, or providing overall editorial review of the document as a whole. The Team agreed to provide revised sections by May 15, 2010, with the goal that the document could be circulated for overall revision during the summer. Ms Evans will compile a list of updates that have been discussed during the last two Team meetings, and will also distribute the latest copy of the FEP document for the Team to work from.

Updates to the FEP will need to be approved by the Council, which will be targeted for the February 2011 meeting.

Presentations to the Plan Teams

The Team also considered that it would be appropriate to schedule presentations on the AI FEP to the Crab and BSAI Groundfish Plan Teams, at their upcoming meetings. The presentation would include a brief update on the FEP content, and potentially an example of how the FEP information is useful for Plan Team recommendations. The presentations would be scheduled for the information meetings of these Plan Teams, which are the May meeting for Crab, and the September meeting for Groundfish.

Presentation to the Council (Ecosystem Committee, SSC, AP, Council)

For the February 2011 AI ecosystem presentation, the Team will be prepared to present updated information for inclusion in the FEP, a 'state of the AI ecosystem' report on AI interactions and indicators, an illustration of how the FEP information is useful as a management tool, and a discussion of how the FEP could be further developed. Some of this work can be prepared by individual members corresponding via email, but the Team will also be meeting in person in January 2011, at which time it will prepare for the Council discussion.

Annual meeting of the AIET

The Team discussed the timing of their annual meeting, and decided that the January timeframe works better than the previous September team meeting. The Team decided to aim for the first full week of January for their annual Team meeting.

AI Ecosystem Team comments for Ecosystem Committee

The following notes were provided as a handout for discussion with the Ecosystem Committee. Recommendations following from the joint Team and Committee discussions are captured in the Committee's minutes.

Goal: Need to increase visibility / people's awareness and use of the AI FEP

Update Terms of Reference for the Team, and use of the FEP

- Purpose of the FEP: information tool help decisionmaking under the BSAI FMP framework, to focus on the separate AI ecosystem within the context of joint management
- Also: suggest inclusion of specific ecosystem considerations within AI for AI issues
- Role of Team: synthesize information available on AI ecosystem (physical, biological, socioeconomic), make available in way that can be used at all levels of Council management process (Council, SSC, Plan Teams, analytical/stock assessment authors)

Short-term timeline for outputs

February Council meeting – update on Team meeting, discussion with Ecosystem Committee

April Council meeting – Council review of Terms of Reference (maybe example of case study on using the FEP as information for particular Council issue)

May Crab Plan Team – similar presentation as to Council,

September BSAI Groundfish Plan Team – presentation on FEP, case study of using FEP information in blackspotted/rougheye BS/AI spatial management

December Council meeting – annual update on ecosystem indicators

January 2011 – FEP team meeting

February 2011 – presentation to Council, SSC, AP – updates to the FEP, state of AI indicators, case studies about utility of FEP, plan for further analysis and expansion of FEP

Presentation to Council in February 2011

Updated FEP

- New information, refinement of interactions and indicators
- Try to include mapping of new information

State of AI indicators

- Incorporate information from 2010 survey, present all information on AI indicators in one place, will allow us to highlight gaps
- Also, 'ecosystem assessment' of available AI indicators to indicate key trends and summaries

Case study example

- how FEP information would add value to the decisionmaking process (how understanding FEP ecosystem context is a tool to help make decisions)
- how add utility to the management process from having this FEP information

Next steps

- priorization of longer-term issues – any direction about what we should work on here

Economist

- Purpose is to have someone fulfill our terms of reference – identify information about ecosystem interactions, highlight where there may be implications from both economic and ecological perspectives
- Needs to be able to balance market and non-market values
- FEP purpose is big picture – biophysical, biological, and socioeconomic
- this role is not a duplication of current Council analyses of regulatory actions – big picture understanding
- e.g. economist might help to identify that Adak plant is sensitive to price of cod – allows better understanding of viability of community of Adak (ties in with FEP goals, vibrant communities)

Longer-term priorities – how should we balance them?

- Work with the Ecosystem Committee on developing ecosystem policy/ evaluating tradeoffs (using visual tools?)
- Consider interactions with non-managed fish and animals when setting biological reference points (maybe symposium at western groundfish to develop)
- Systematic process for considering ecosystem consideration in harvest specifications
- Quantitative risk assessment
- Expansion of cumulative effects
- Expand geographic area of FEP to look at transition areas to east and west
- What's the most effective way to start filing our data gaps (what are highest priority indices gaps)
- Conceptual model of the AI ecosystem – mechanistic concepts of how the system works (maybe symposium to develop – similar as for BSIERP)

Ecosystem Committee Minutes

January 28, 2010 2-4pm
NMML Conference Room, Alaska Fisheries Science Center, Seattle, WA

Committee: Stephanie Madsen (chair), Jon Kurland, Dave Benton, Bill Karp, Caleb Pungawi, Diana Evans (staff), Chris Oliver (staff)

AI Ecosystem Team: Diana Evans, Sandra Lowe, Forrest Bowers, John Olson, Paul Spencer, Jennifer Sepez, Steve Barbeaux, Kerim Aydin, Sarah Gaichas, Francis Wiese, Carol Ladd

Others attending included: Stephanie Zador, Chang Seung, Jon Warrenchuk, Dave Fraser, Ivonne Ortiz, Jason Anderson, Debra Fischman

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The Committee met jointly with the AI Ecosystem Team.

Aleutian Islands Fishery Ecosystem Plan

The Committee heard a report from the Team about their workshop, at which the Team reviewed new information about the AI, and discussed future directions for the FEP and the Team. The Team suggested that now that the FEP has been developed and approved by the Council, the next step is increase awareness in the management process about the information that is available in the FEP, and how it can better be utilized. The Team and the Committee discussed specific examples and suggestions for improving utilization of the AI ecosystem information at all levels of the Council process (among analysts and assessment authors, at Plan Teams, and in the SSC, AP, and Council arenas). **The Committee concurs that Terms of Reference should be developed for the AI Ecosystem Team,** to articulate the purpose of the Team, the purpose of the FEP, and how the Team and the FEP should interact with existing Plan Teams and the Council process generally. The Committee suggests that the Terms of Reference be developed among Team and Committee members, and presented to the Council in April for approval.

The Committee also concurs with the Team's plan and schedule for updating the FEP. The Team intends to work on incorporating new information available on the Aleutian Islands, and the review of interactions and indicators that was accomplished at the last Team meeting, over the next six months. Noting that the AI trawl survey, which informs many of the AI indicators, is scheduled to occur this summer and that the fall time period is especially busy for stock assessment authors and the Council due to harvest specifications, the Team suggested targeting February 2011 for a comprehensive presentation to the Council. The presentation would include updates to the FEP, a comprehensive review of the state of AI indicators and ecosystem state, and plans for further analysis. In the interim, the Team will also plan to make presentations to the Crab and BSAI Groundfish Plan Teams.

The Committee discussed the Team's recommendation for appointing an economist to the Team, and agreed that this should follow on from the development of the Terms of Reference. With respect to prioritizing longer-term projects for further work on the AI FEP, this will be addressed at future Committee meetings in preparation for the Council discussion in February 2011.

Comments on the national Coastal and Marine Spatial Planning Framework

Mr Oliver explained that a national framework for coastal and marine spatial planning was released for public comment on December 9, 2009, and the comment period is open through February 12, 2010. The eight Regional Fishery Management Councils (RFMCs) have submitted a joint letter addressing some of the major issues that they see with the proposed framework, including a lack of clarity about the relationship between the framework and existing authorities and the proposed composition of regional

planning bodies, and that RFMCs are not mentioned at all in the framework. **The Committee recommends that the Council submit a letter concurring with the RFMC letter, but adding specific comments relevant to Alaska, along the following lines:**

- Many of the ideas encompassed by marine spatial planning are positive, and the Council is already engaged in pursuing many such initiatives. The Council has established an extensive system of protected areas for habitats of particular concern, endangered species, and ecologically sensitive areas. Additionally, the Council has developed a Fishery Ecosystem Plan for the Aleutian Islands, which identifies spatial relationships in the Aleutian Islands ecosystem, and considers not only the effects of the various fisheries which operate in the ecosystem area, but also interactions of other marine activities such as marine shipping, energy development, and military activities. The Council was also instrumental in setting up the Alaska Marine Ecosystem Forum, which brings together all Federal and State agencies in Alaska with jurisdiction over marine activities, to improve coordination and collaboration among these agencies.
- The framework identifies Alaska as a single region. As the Council has previously iterated in many different contexts, the Alaska ecosystem areas are so diverse, physically, biologically, and socially, that considering them as a single system does not allow for meaningful management. However, the Council does agree that having a single regional planning body for Alaska would be advisable, which would provide a centralized point for management agreements and decision making among agencies. At the same time, the ability to further subdivide within Alaska to specify planning teams for each ecosystem area would be critical in order to assemble the appropriate expertise for each area, engage appropriate stakeholders, and appropriately identify regional objectives and information.
- The decision making framework identified in the report presupposes that management agreements will be reached among the Federal, State, and tribal partners that are to be constituents of the regional planning bodies. The management agreements are integral to the implementation of any measures put forward in the CMS plan. The framework does not address what would happen if any of the non-Federal partners are not willing to participate at all in the outlined process, however.
- The framework highlights throughout the importance of a regional approach to implementing marine spatial planning. Should disagreements occur among agencies, however, dispute resolution would be handled by the National Ocean Council in Washington, DC. This effectively removes the seat of power from the regions to Washington, D.C., which is inappropriate for a planning initiative that is intended to be ecosystem-based and reflect the needs of regional stakeholders.
- The framework is unclear about the relationship between this initiative and existing authorities, such as the Magnuson-Stevens Act, the Coastal Zone Management Act, the requirements for tribal consultation, and State of Alaska law. The Council recommends that this relationship be clarified.
- Additionally, the framework also identifies a requirement for consistency with international law, but is not specific about which international law, and how and in what manner it should be applied.
- While the framework explicitly suggests that there will be no new authorities, there is also indication that agencies will need regulatory or statutory changes in order to comply with the new framework. This seems to be a contradiction.
- The process that is envisioned in the framework is likely to be expensive, and will require much in the way of staff and resource effort on the part of various agencies in order for it to be implemented. The Council agrees that the goals of marine spatial planning are worthwhile, but the governance ideas that are proposed in the framework seem more likely to slow down the process for achieving marine spatial planning, rather than propel them forward, especially given progress that has already been achieved in Alaska.

PRIBILOF ISLANDS STEWARDSHIP PROGRAM
P.O. BOX 938
ST. GEORGE ISLAND, AK 99591
907-859-2233
907-859-2297 FAX

Date: 12 February 2010

To: North Pacific Fishery Management Council
605 West 4th, Suite 306,
Anchorage, Alaska 99501-2252

Re: NPFMC February 2010
Agenda Item D-3 (d) HAPC Criteria and (D-3 (c) EFH 5-year Review)

Dear Council Members:

HAPC Criteria

Distracting potentially meaningful discussions on canyons over semantics and questions such as "are they rare"? or, "are they unique" has stymied action. **One glance at a chart of Alaska or of the entire planet will affirm that canyons are RARE. And, if industrial fishing, marine mammal foraging and seabird foraging are independently or jointly considered a proxy for "uniquely productive", the Bering Sea shelf edge canyons certainly stand out. Canyons and the gyres they generate are targeted by all of these predators every year.**

Shelf edge submarine canyons are well-documented sites of enhanced biomass due to their unique shape and connections from deep to shallow environments, with unique ocean current mechanisms that lead to the concentration of prey items like krill. Canyons on the Bering Sea shelf edge seem to serve as conduits for funneling deep oceanic forage species like myctophids onto the shelf environment. Recognizing the uniquely productive properties of canyons, many countries globally and many states nationally have protected undersea canyons from fishing and non-fishing threats. Despite over ten years of testimony, proposals and recommendations by the Plan Teams, SSC, the public, you - the Council have avoided taking action to fully analyze canyons under the directives of EFH or HAPC.

Delays in identifying acceptable "criteria" for meeting the EFH mandates in the MSFCA has likely had irreversible repercussions. How many more trawls have eviscerated canyon seabed depths in the decade over which the NPFMC has contemplated alternate management measures for canyons? Meanwhile, by-catch has skyrocketed, Pollock has

plummeted and declines in seabirds, fur seals and sea lions at the Pribilof Islands continue at an alarming rate.

Rather than leave canyons strictly to a HAPC long term discussion, it may be more prudent to consider an FMP level EFH amendment to analyze whether ALL canyons, like ALL seamounts in the past, merit special consideration for protection from fishing and other threats.

The well documented skate nurseries identified by NOAA and others harbor many species of these long-lived elasmobranchs, including adults, baby skates and extensive egg case deposition areas where some species require at least three years just for embryonic development! How many egg cases have been disturbed or redistributed to less favorable habitats during these years of posturing at the Council?

RECOMMENDATIONS

1. Dedicate staff time and request research assistance from NOAA to address items #1 and #2 on the "Immediate Concerns" Habitat list beginning on page 69 of the EFH 5-year review as soon as possible:
    a. Evaluate habitats of particular concern:
        i. Assess whether Bering Sea canyons are habitats of particular concern, by assessing the distribution and prevalence of coral and sponge habitat, and comparing marine communities within and above the canyon areas, including mid-level and apex predators (such as, short-tailed albatrosses) to neighboring shelf/slope ecosystems.
        ii. Assess the extent, distribution, and abundance of important skate nursery areas in the EBS, to evaluate the need for designation of new HAPCs.
2. Dedicate staff time to address items listed in section II: Habitat Mapping and (research on) ecological function.

I agree with the SSC requests that "the footnoted definition of habitat that accompanies the revised criteria be extended to include the water column as well as the seafloor substrate." I also agree with the SSC's comment about the importance of "research to improve our understanding of EFH for squid and for forage fish." Forage fish and squid, a major forage species, play a major ecological role in the Bering Sea ecosystem as primary "currency" for the transfer of energy from secondary producers to marine mammals and seabirds. Although EFH was identified for these species groups, no explicit management or mitigation measure has been undertaken to minimize effects of fishing or other activity on this critical suite of organisms.

Additional Consideration: Best Available Science

The Pribilof Island Habitat Conservation Area (PIHCA) is considered a *de facto* EFH protection measure. Effectiveness of this measure in meeting the goals for which it was

established should be analyzed. If the area and the fishing restrictions within the PIHCA were designed using the best available science to protect king crab and other species, it appears as the "best" science isn't good enough. Could it be that protecting only the shelf without protecting the corridor connecting it to the deep sea that feeds it is in fact contributing to habitat fragmentation without achieving alleged goals of the action? In the case of king crab, for example, there has been no detectable recovery of Pribilof blue king crab and no significant increase in red king crab in the PIHCA since established in 1995.

Since 2004 the St. George Traditional Council has been requesting for the Council and NMFS, with whom they co-manage northern fur seals and Steller sea lions, "that the 20 nautical protected zone around St. George Island haul-outs be reinstated so that it is comparable to other Alaskan haul-out sites used by similar numbers of Steller sea lions." In the January 2010 draft minutes from the Steller Sea Lion Mitigation Committee Meeting on page 3 it is reported: "At Dalnoi Point on St. George (EBS), scat samples collected in June 2009 found 80% frequency of occurrence of Pollock, all >40 cm in length (commercial size). This is just further evidence of the importance of extending the PIHCA to include the self-break south of St. George and Pribilof Canyon.

Pribilof Islands Habitat Conservation Zone

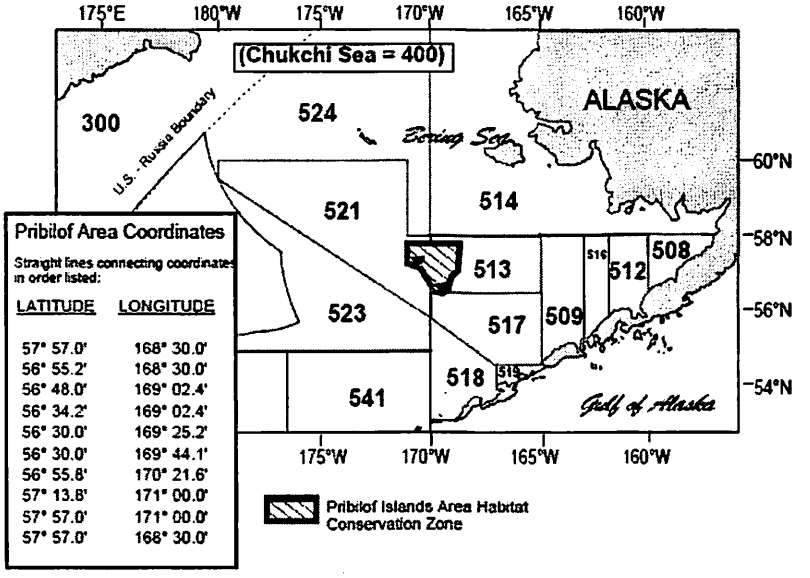

Figure 10 to Part 679. Pribilof Islands Area Habitat Conservation Zone in the Bering Sea

Human Humility and Responsibility

Despite some efforts to map EFH and protect some features in the EEZ, it is imperative that we recognize that Alaska is but one region within the global ocean – with an ecosystem in a fluid, multidimensional realm flowing over a tapestry of physical seabed features. It is even more complex than the terrestrial environment – where many early

efforts to "protect" large predators and other creatures from extinction involved establishing small parks and refuges that comprised only a tiny fraction of the animals' home ranges. Isolating sections of habitat from the connectivity among species and adjacent habitats led rapidly to the demise of most of the very species (Tigers, gorillas, pandas, etc) people sought to protect. This degree of habitat fragmentation and ecosystem unraveling which has occurred in terrestrial environment is now taking place in the aquatic systems globally. I would therefore urge the Council to consider that:

1. EFH includes physical locations important to an FMP species and their prey – even if the organisms do not occupy the benthos for their entire life history.

2. Both motile species and their prey depend upon more than the physical seabed under laying their distribution – they are connected to the system in which they live through benthic-pelagic coupling processes, vertical movement of species within the water column, and species interrelationships we may not yet fully understand.

3. Marine spatial management measures considered under EFH and HAPC should acknowledge the full definitions with the MSFCMA and provide adequate spatial buffers around physical habitats to better provide for comprehensive protection of the ecological functions those habitats provide for FMP species and their prey.

RECOMMENDATIONS

EFH 5-year review

1. Include data on species assemblages in forage fish category and squid category. Indicate what FMP and non-FMP species in the GOA-BSAI consume those forage species. Characterize trophic position as best possible to clarify role in foodweb. Provide species-specific distributional maps – whether complete or incomplete.

2. Provide full profile by species by fine scale area by fishery showing what forage and squid species are harvested incidentally as by-catch.

3. Identify multi-species forage fish and squid "hotspots" based on distribution and by-catch data.

4. Craft an FMP amendment package advancing measures which protect forage species in hotspots from seabed to sea surface from effects of fishing and non-fishing activities.

5. Provide analysis of PIHCA efficacy as EFH mitigation measure. Is it working? If not meeting objectives, consider requesting staff to develop an EFH amendment which addresses forage fish and extending the PIHCA to encompass the self edge

off St. George island and Pribilof Canyon – thereby reconnecting an ecological corridor which will likely provide more comprehensive protection from the habitats and species associated with the Pribilof Island region.

Thank you for your consideration of my comments. Best wishes in your endeavor to mitigate human impacts to marine habitat.

Sincerely,

Karin Holser
Pribilof Islands Stewardship Program

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: D-3(d) HAPC Criteria

	NAME (PLEASE PRINT)	TESTIFYING ON BEHALF OF:
1	Jennifer Spencer-Iiams	Concerned Citizen
2	Brenda Gunderson	Concerned Citizen
3	David Foster	Concerned Citizen
4	George Plastinkoff	Greenpeace - AITC
5	PAULA WALKER	CONCERNED CITIZEN
6	SHELBY SPENCER	CONCERNED CITIZEN
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person " to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

TESTIMONY TO AP
NPFMC MEETING
12 February 2010
Portland Ore

RE: HAPC PROCESS

Greenpeace, the Alaska Inter Tribal Council (AITC), the Alaska Federation of Natives (AFN) (both through resolution), the 12 Regional Corporations, the Alaska Village Corporations, over 200 Alaska Tribal Governments and over 105,000 Alaska's First Peoples;

- Requests the SSC and the AP to support and recommend that the Council take urgent action to list Zhemchug and Pribilof Canyons as habitat areas of particular concern. According to the Office of Habitat Protection Division, there are four criteria, which qualifies these unique areas. They are:

- Importance of the ecological function provided by the habitat.
- Extent to which the habitat is sensitive to human-induced environmental degradation.
- Whether, and to what extent, development activities are, or will be, stressing the habitat type.
- Rarity of the habitat type.

According to our investigation two years ago with our diving investigation, and the science provided by Local and Traditional Knowledge, these Canyons qualify in all four of the above criteria.

The Canyons are an important source of food and nutrients for the entire Bering Sea ecosystem that helps to provide our people with the necessary food to help feed and care for our families. Our traditions and heritage has taught us that all living things are sacred and connected. And if human beings mistreat and disrespect them they will leave us. Perhaps this is what's happening in our waters.

LTK is as valid as western science but we must not compare or confuse them to be equal. Rooted in the kind of time series that western scientists can only dream about, LTK surpasses the understanding of what is contained in scientific journals. Sadly, western knowledge and technology has more often than not contributed to conditions of poor environmental health, through climate change, industrial fishing and ocean acidification.

We are concerned that the Council in 2007 said that not enough is known about the canyons to establish protections against industrial fishing practices. It seems, and LTK teaches us that the opposite is true, that if not enough is known then be very careful with how it is treated.

We hope you will support the idea that these canyons need further study before they are damaged any further. We cannot do any meaningful research while the habitat is being destroyed.

Thank you.

George Pletnikoff
Greenpeace.

GREENPEACE
702 H Street, NW, Suite 300, Washington, DC 20001
Tel: 202-462-1177 • Fax: 202-462-4507
1-800-326-0959 • www.greenpeaceusa.org

To: Members of the North Pacific Fishery Management Council
Re: HAPC criteria and schedule

February 11, 2010

Greenpeace urges the North Pacific Fishery Management Council to take additional mitigation action to protect vulnerable seafloor habitats in the Bering Sea canyons, Aleutian Islands, and the Gulf of Alaska. Bering Sea canyons are mentioned as a priority for research, but the presence of canyon coral and sponge habitats is not mentioned in the Essential Fish Habitat (EFH) review. Proposals to designate Bering Sea canyons as Habitat Areas of Particular Concern (HAPCs) were shelved without Council decision. Allowing these habitats to continue to be subjected to high impact fishing operations is inconsistent with U.S. and international laws enshrining a precautionary approach to fisheries management,

In 2007, Greenpeace and NOAA documented the presence of at least 14 species of deep water corals in Zhemchug and Pribilof canyons, as well as more than 20 sponge species. Greenpeace and NOAA authors of a preliminary study of the findings from Greenpeace's Bering Sea Canyons expedition noted that damage to corals and striations in the substrate was observed on several transects in both canyons, and recommended that canyon coral habitats be prioritized for protection. The authors also reported that commercially important species, most notably Pacific Ocean perch (*Sebastes alutus*) and king crab (*Paralithodes* sp. and *Lithodes* sp.) were observed associated with corals and sponges, corroborating Brodeur's conclusions that the whip coral *Halipteris* sp. provides habitat essential for sustaining POP populations in Pribilof Canyon.[1]

This summary was presented at the 2008 Alaska Marine Science Symposium and the 2008 Deep Sea Coral Symposium and shared with the SSC, AP, and the Council.[2] Many of the coral and sponge species documented in Greenpeace's 2007 Bering Sea Canyons expedition are not known elsewhere in the Bering Sea and are significant range extensions for the species, and at least one, *Aaptos kanuux*, is new to science.[3]

Subsequent to these findings, in NOAA's March 2008 Report to Congress on the Implementation of the Deep Sea Coral Research and Technology Program, Pribilof and Zhemchug Canyons were

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[1] Richard D. Brodeur, Habitat-specific distribution of Pacific ocean perch (Sebastes alutus) in Pribilof Canyon, Bering Sea. Continental Shelf Research 21, Issue 3: 207-224 (2001)
[2] Robert P. Stone and John Hocevar, New Coral Data for Bering Sea Canyons. Alaska Marine Science Symposium 2008. www.greenpeace.org/usa/press-center/reports4/new-coral-data-for-bering-sea
[3] Lehnert et al, A new species of *Aaptos* (Porifera, Hadromerida, Suberitidae) from Pribilof Canyon, Bering Sea, Alaska. *Zootaxa* 1939: 65–68 (2008)

highlighted as areas containing deep sea corals that currently lack protection and are vulnerable to fishing impacts. As prescribed in the Magnuson-Stevens Fishery Conservation and Management Reauthorization Act, "*the [Commerce] Secretary in consultation with the Councils, shall submit biennial reports to Congress and the public on steps taken by the Secretary to identify, monitor, and protect deep sea coral areas, including summaries of the results of mapping, research, and data collection performed under the program.*"

Until full analysis of the data from Greenpeace's Bering Sea canyons expedition are published in a peer reviewed journal later this year, the preliminary results of this study – the only *in situ* survey of Zhemchug Canyon and the only *in situ* study of Pribilof Canyon below 243 meters - presented by NOAA and Greenpeace authors represent the Best Available Science outlined in National Standard 2.

Despite obligations under the Deep Sea Coral Research and Technology Program to "prioritize program activities in areas where deep sea corals are known to occur" and "to develop technologies or methods designed to assist fishing industry participants in reducing interactions between fishing gear and deep sea corals," no action has been taken to prevent damage to canyon coral and sponge habitats.

The draft Essential Fish Habitat Review confirms that several types of fishing damages corals in Alaska, and that coral recovery rates are slow: "Even relatively low fishing intensities still eventually reduced corals to very low levels in exposed areas." Further to this point, it is clear that past NPFMC actions for protecting corals have focused largely upon exclusion of bottom trawl gear. However, the impacts of pelagic gear fished (frequently) in on-bottom mode incur damage to corals and sponges across the wide swath of their paths. The EFH review would be more accurate to address this reality and future actions must be designed to address pelagic gear impacts to vulnerable coral and sponge habitats.

The "draft working document of SSC/Plan Team workgroup to refine the HAPC proposal rating criteria" summarizes concerns mentioned by the Plan Teams and SSC regarding several aspects of the HAPC process. The document does not comment on the additional features adopted by the Council for the 2004 proposal process:

"Additionally, nominations were to be based on best available scientific information and included the following features:

1. *Sites must have likely or documented presence of Fishery Management Plan (FMP) rockfish species.*
2. *Sites must be largely undisturbed and occur outside core fishing areas."*

These additional requirements are inconsistent with federal EFH and HAPC regulations, which are designed to identify essential fish habitats and protect them from adverse effects. Continuing to exclude areas from consideration that are currently vulnerable to adverse effects would not meet the Council's responsibilities.

Finally, we would like to draw attention to resolutions approved by the Alaska Inter-Tribal Council and the Alaska Federation of Natives that call on the Council to protect habitats essential to the breeding and nursery areas for foods upon which native communities depend.
Per the above, Greenpeace recommends that:

- **The Council amends the EFH Review to incorporate the best available scientific information, including maps exhibiting species distributions, for *all* known coral and sponge habitats in the Alaska EEZ;**

- **The Council initiates an accelerated EFH amendment package and HAPC process to protect coral and sponge habitats from the effects of fishing; and**

- **The Council drops the arbitrary and capricious non-statutory HAPC requirement that *"Sites must be largely undisturbed and occur outside core fishing areas."***

Sincerely,

John Hocevar
Oceans Campaign Director
Greenpeace USA
(202) 319-2408