



September 29, 2022

North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501-2252

Re: Agenda Item C8, Essential Fish Habitat

Dear Members of the Science and Statistical Committee,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's oceans and sustaining the working waterfronts of our coastal communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners, and diverse fishing families. Our ways of life, livelihoods and local economies depend on sustainable fishing practices, healthy ecosystems, and productive oceans.

Thank you for the opportunity to comment on the Essential Fish Habitat (EFH) Stock Author Report. Our comments will focus on the overall EFH Fishing Effects (FE) Discussion Paper goals:

- Does the 2022 FE evaluation support the continued conclusion that adverse effects of fishing activity on EFH are minimal and temporary in nature?
- For the species for which the stock author identified that data limitations prevent making the conclusion that adverse effects of fishing activities on EFH are minimal and temporary, does the Plan Team or SSC have guidance on evaluating FE beyond what is provided in this document?
- Responses to the SSC Recommendations

Since the 2005 EFH 5-year review, it has been determined that fishing activities *did have long term effects on habitat but would not be detrimental to fish populations or their habitats*. This is a conclusion AMCC does not support for reasons outlined below.

While looking at the presented habitat disturbance frequency graphs (Figure 1, 2, and 3)¹ it is concerning to see areas of greater than 10% habitat disturbance. While current protocol examines EFH and habitat disturbance from a single species aspect, high levels of habitat disturbance as indicated by effects on a single species does affect that ecosystem as a whole. As

¹ Olson J, Smeltz S and Lewis S (2022) Effects of Fishing on EFH Discussion Paper. North Pacific Fishery Management Council. February 2022.



we are currently facing critically low abundance of many crab stocks in Alaskan waters, we need to start assessing habitat disturbance for its impacts on the ecosystem as a whole and not solely on individual species populations. Disturbance to the core EFH area (CEA) of habitat can affect all the species down to the smallest of feed organisms. Greater protection of EFH has conservation implications far beyond a single species, including coral gardens, seamounts, canyon heads, rocky reefs, sponge beds that provide both protection and food²³⁴.

Ongoing harvest of other target species in disturbed EFH areas prioritizes that harvest opportunity over the critical conservation benefits of prioritizing this habitat for struggling species – and the many other organisms affected by the fishing effects. Concurrently, climate change is influencing biodiversity in ways that are difficult to anticipate. We cannot afford to treat individual species suffering from significant declines as isolated casualties of the climate, and allow other harvests within that same ecosystem to progress without careful consideration of their impact on EFH and other components of that ecosystem matrix. We must do our due diligence to prevent losing a portion of the food web and ecosystem in these areas to support both the recovery of the collapsed species, the ongoing productivity of other species (i.e. trophic cascade), and perhaps most importantly the integrity of ocean biodiversity inextricably linked to intact, healthy habitat. These are the most critical, baseline tools of resilience in the ocean.

In the 2022 EFH FE Discussion paper, none of the species reported to have *insufficient information to make a decision* were elevated to the plan teams¹. It is troubling that an absence of sufficient information leads to inaction instead of conservative adjustments for the overall health of the stocks, particularly with stocks in decline/collapse. There is an ongoing need to incorporate new and more detailed data⁵. It is important that the SSC think critically about that lack of conservation concern, and whether the model inputs and outputs are sufficiently capturing the status and conservation needs of Alaskan waters. With such low abundances of

² North Pacific Fishery Management Council. 2021. Fishery Management Plan for Bering Sea/ Aleutian Islands King and Tanner Crabs. NPFMC, Anchorage, AK.

³ Shester G and Warrenchuk J (2007) US Pacific coast experiences in achieving deep-sea coral conservation and marine habitat protection. *Bulletin of Marine Science*, 81(3)169-184.

⁴ Shester GG, Enticknap B, Mecum B, Blacow-Draeger A, Brock T and Murray S (2021) A Win-Win for Deep-Sea Corals and Fishing: Increasing Seafloor Protections While Restoring Fishing Opportunities Off the United States West Coast. *Frontiers in Marine Science*, 1218. doi: 10.3389/fmars.2020.525619

⁵ National Research Council (NRC) (2002) *Effects of Trawling and Dredging on Seafloor Habitat*. Washington, D.C, National Academy of Sciences, National Research Council.



these crab stocks, new research and additional data is always a priority, but we no longer have the convenience of time. Action must be taken to provide immediate conservation benefits to EFH, while continuing to conduct research that can better inform those conservation measures in future.

AMCC urges the SSC to explore the consequences of addressing EFH across the entire stock range of species. For example, red king crab (RKC) are regionally distinct populations that are managed separately and are thought not to contribute toward other RKC populations. Looking closely at distinct populations' EFH would give a more accurate view of habitat disturbance percentages that might point to concurrent trends in decreasing populations. Conservation in the context of a changing climate and rapidly declining or shifting stocks demands reactions that are more substantial and more timely than ever before. Status quo approaches to habitat protections and ecosystem interactions are insufficient.

In response to SSC recommendations of incorporations into the report:

- No stock author recommended elevating any of the 9 species but stated there was insufficient information to make a decision to elevate for mitigation; AMCC encourages the SSC to push for using a conservation lens while working in areas of less than desirable data, especially when knowing the current state of some of the 9 stocks listed.
- AMCC appreciates the use of unobserved fisheries data in the model development to accurately capture the whole picture of fishing effects.
- AMCC respects the updates to the model that update parameters to data specific to the North Pacific. The North Pacific is home to many long-lived species that have potential differences in growth and recovery time from the habitat. Providing additional visualization of this information is important and appreciated.

We applaud the time and effort of the SSC in supporting the North Pacific Council's mission to prevent, mitigate, or minimize any adverse effects from fishing to the extent practicable, if there is evidence that a fishing activity adversely affects a stock in a manner that is "more than minimal and not temporary in nature." To that end, continuous review of current or future fishing impacts on stock health, and comprehensive ecological analysis to support responsible decision-making, is critical to the conservation of our marine resources and ecosystem health. We appreciate the opportunity to contribute to this dialogue. Thank you for considering our comments.

Respectfully,



Marissa Wilson
Executive Director

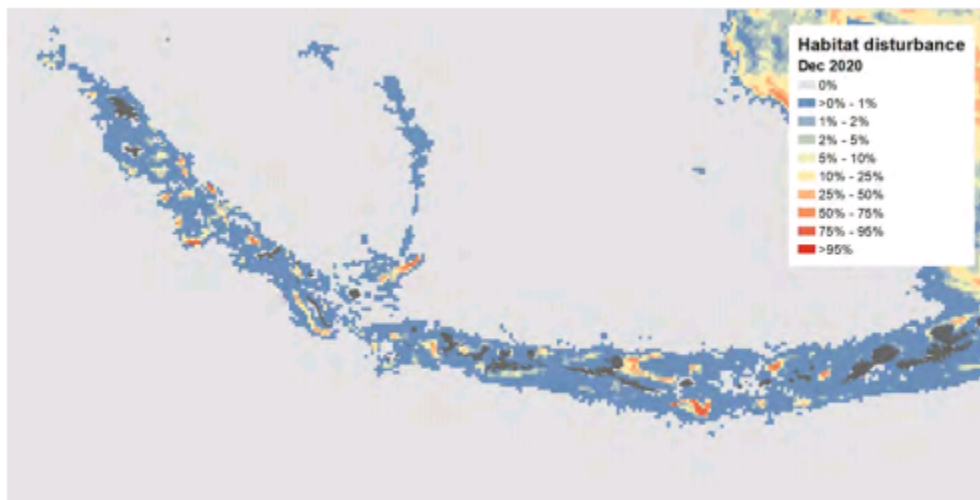


Figure 1. Aleutian Islands cumulative percentage habitat disturbed. All gears combined.

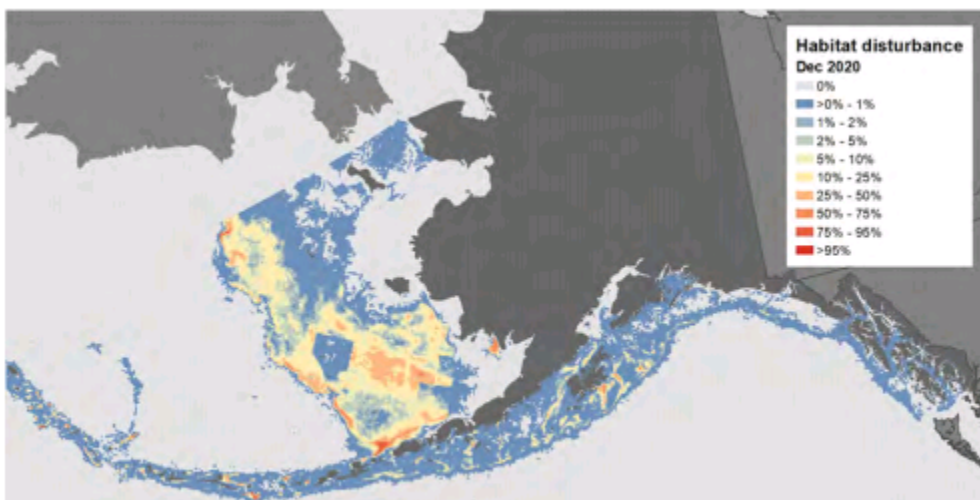


Figure 2. Eastern Bering Sea (EBS) cumulative percentage habitat disturbed. All gears combined.

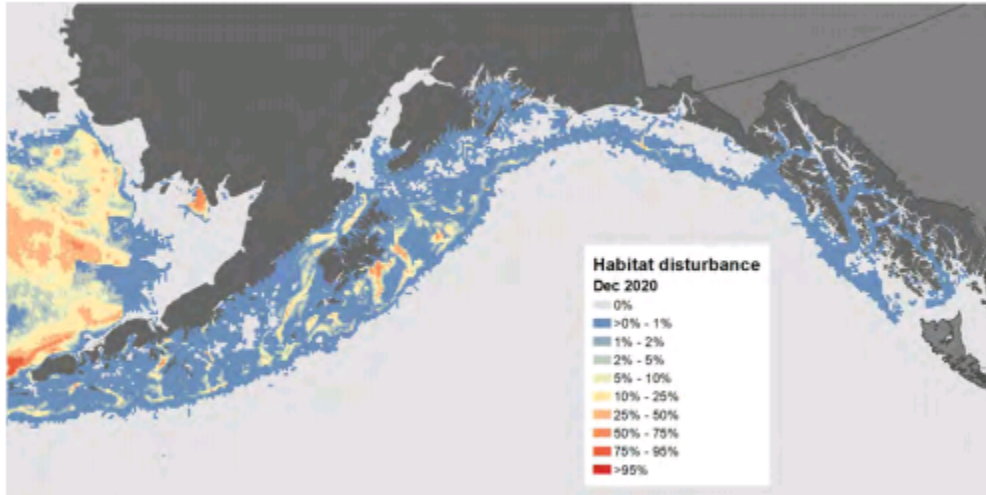


Figure 3. Gulf of Alaska (GOA) cumulative percentage habitat disturbed. All gears combined.