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habitat).⁸ The NPFMC and NMFS must take a different approach than the New England Council and acknowledge here that cold water corals are indeed habitat features.

Habitat Features

The proposed model has increased the number of habitat features (12 geological features and 14 biological features) used to describe the habitat. This approach is interesting but the method used to determine which features are included to describe North Pacific habitats needs to be better explained.

Further, there needs to be consideration of the effect of increasing the number of habitat features and then averaging habitat feature vulnerability and susceptibility in the model output. There may be bias in the model outputs if an area of habitat has a higher proportion of low susceptibility, quicker recovering habitat features; even if highly susceptible, slow recovering habitat features are present. Averaging the recovery and sensitivity values for all the features in the habitat area may bias the model output towards lesser impact. I.e. A habitat area could lose all of its slower recovering habitat features but the model output would show a negligible impact if a larger number of quicker recovering habitat features were present. The model output would therefore be in contrast to a significant change to the habitat.

Conclusion

Given all these limitations, a precautionary approach for interpreting modeled or even observed impacts to habitat is necessary. Much more consideration of habitat at the scale that might be meaningful to feeding, breeding, and growth to maturity both for an individual animal and at the scale of a population is vital.

Oceana supports the EFH conservation actions taken by the North Pacific Fishery Management Council thus far. We look forward to working with you to continue to improve the identification and protection of EFH in all Fishery Management Plans.

Sincerely,

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⁸ Stone, R. P. (2006). "Coral habitat in the Aleutian Islands of Alaska: depth distribution, finescale species association, and fisheries interactions." *Coral Reefs* 25(2): 229-238.