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March 28, 2017

Mr. Dan Hull, Chair  
North Pacific Fishery Management Council  
605 W. 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

RE: C-6 Essential Fish Habitat Omnibus Amendment

Dear Chairman Hull, Dr. Balsiger, and Council Members:

Over the past two decades, the North Pacific Fishery Management Council (NPFMC) and the Alaska Region of the National Marine Fisheries Service (NMFS) have led the effort to designate and protect Essential Fish Habitat (EFH). Oceana commends the Council and NMFS for continuing that leadership and for developing the maps and analyses to support updating the descriptions of EFH,<sup>1</sup> and we appreciate the opportunity to comment. Oceana recommends that the Council select Alternative 2 for each of the 8 action items in the EFH Omnibus Amendment package. Alternative 2 would update the EFH descriptions in the Fishery Management Plans, refine the EFH research priorities, and initiate a process to identify Habitat Areas of Particular Concern (HAPC).

Maintaining the health and resiliency of EFH is necessary to support breeding, feeding, and growth to maturity of the large populations of fish in the North Pacific that are important for commercial, recreational, and subsistence fisheries. Congress has recognized that “[o]ne of the greatest long-term threats to the viability of commercial and recreational fisheries is the continuing loss of marine, estuarine, and other aquatic habitats” and, accordingly, required the identification and protection of EFH.<sup>2</sup> Marine habitats in the North Pacific can be particularly vulnerable to cumulative impacts from human activities like commercial fishing because climate change impacts from warming water temperatures, reduced sea ice cover, and increasing acidification are all more pronounced at northern latitudes. In particular, deep-sea corals, which are important habitat structures, are especially vulnerable to these cumulative impacts. Ensuring the resilience of these EFH features remains a conservation priority.

We support the EFH conservation actions taken by the NPFMC thus far, and urge the agency to select Alternative 2, which would approve the proposed EFH amendments and complete the five-year review of EFH. We look forward to continuing our work with you to find ways to improve the condition and resilience of marine habitat in the North Pacific.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan J. Murray".

Susan Murray

Deputy Vice President, Pacific

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<sup>1</sup> NMFS. *Public Review Draft, EFH Omnibus Amendments, April 2017 Summary Report – Initial Review.*

<sup>2</sup> See, e.g., 16 U.S.C. 1801 §2(a)(9); 1853(a)(7).