


MEMORANDUM

TO: Council, SSC and AP Members

FROM: Clarence G. Pautzke  
Executive Director 

DATE: September 20, 2001

SUBJECT: Draft Programmatic Groundfish SEIS

ESTIMATED TIME 2 HOURS
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**ACTION REQUIRED**

Receive status report and identify possible preferred alternative.

**BACKGROUND**

The Council provided comments to NMFS on the draft Alaska Groundfish Fisheries Programmatic SEIS in June. The public comment period closed on July 26, 2001, with more than 22,000 comment letters received by mail or FAX. Since then, the SEIS Team has been conducting a synthesis of all substantive comments contained in those letters. NMFS will carefully consider all of the comments and make a determination on what changes need to be made to the draft prior to issuing a final SEIS based on its review.

Steve Davis, SEIS Team Leader, will provide the Council with a status report on the team's progress to-date; a review of the comment synthesis process; and provide an overview of the most substantive issues raised by the public concerning the draft SEIS. Recommendations to the Council concerning the next steps to be taken on this project may be available. The Council will consider identifying a possible preferred alternative based on those analyzed in the SEIS.

**AGENDA ITEM C-5**  
**Draft Programmatic SEIS**

**October 2001**

Steven K. Davis  
NMFS  
Anchorage, AK



# ALASKA GROUNDFISH FISHERIES

## Draft Programmatic Supplemental Environmental Impact Statement STATUS REPORT



October 2001

## PROGRAMMATIC SEIS Public Comment Period

- Comment period began on January 26, 2001 and ended on July 25, 2001
- 21,294 letters were received by AKR
- Of the comments received:
  - 20,895 were form letters
  - 329 were personalized letters
  - 70 people provided oral testimony (from public hearings and statewide teleconference)

## Steps for Comment Review and Synthesis

- All letters and testimony were given unique ID#
- All were analyzed for demographic information and content
- All letters and testimony were reviewed and each substantive comment was given a unique comment ID#
- The 21,294 letters generated 6,289 substantive comments

## Comment Tracking and Coding Strategy

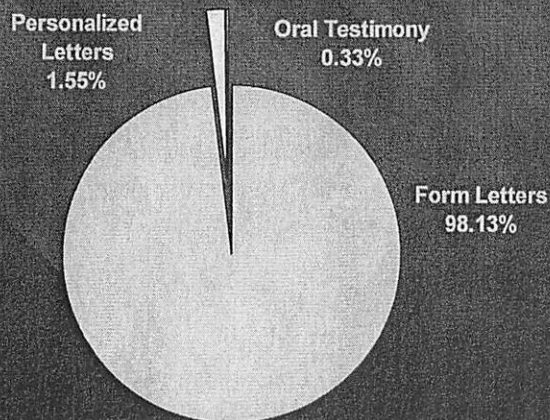
- All substantive comments were entered into a comprehensive database for tracking and synthesis
- These comments were coded by issue categories
  - Frequently a comment was associated with multiple issue categories
- Forty-two issue categories were used to organize the public comments

## Issue category identification

- Examples of the issue categories include:
  - » Native Alaskan concerns
  - » Ecosystem-based management
  - » Economic and socio-economic effects
  - » Gear effects on habitat
  - » Range of Alternatives
  - » Data Quality/Uncertainty
  - » Limits (TAC/MSY/PSC)
  - » Marine Protected Areas
  - » Ecosystem Health/Biodiversity Concerns
  - » General/Editorial
  - » NEPA Compliance
  - » Coastal Community Concerns
  - » Decision-Making Process

## Results from Database

- 21,294 Total Letters Received





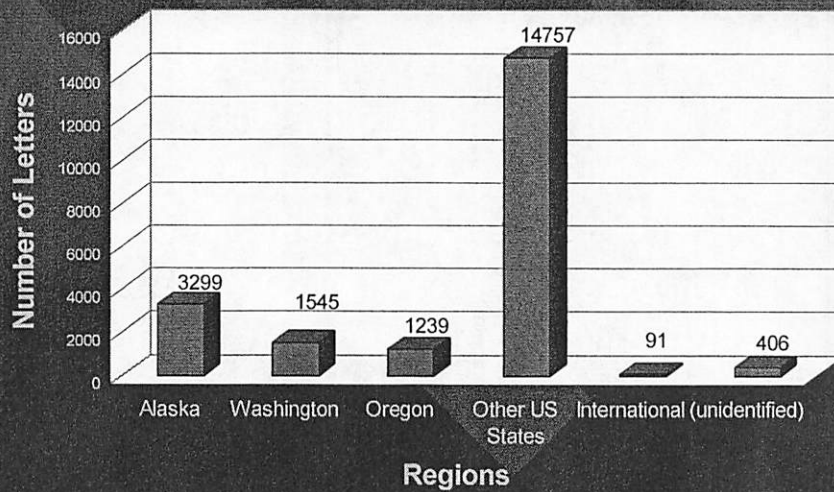
## Form Letters

- 20,895 form letters received in total
- 17 different form letters versions
- 10 form letters types originated from different environmental groups nationwide
- 7 form letter types originated from fishing industry and fishing community groups

## Geographical Distribution of Public Comments

- Public Comments were received from all 50 states as well as Washington, D.C. and Puerto Rico
- Letters were sent in from 28 foreign countries
- The top five US states to submit comments were (respectively): Alaska, California, Washington, Oregon and New York

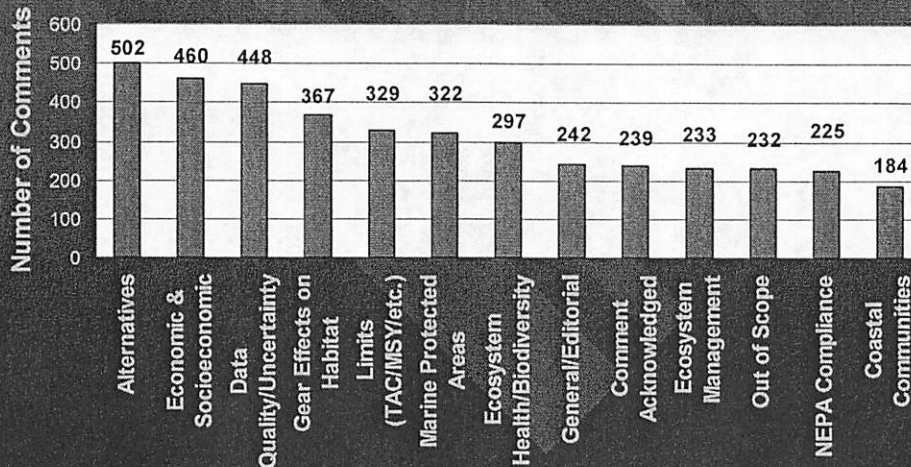
## Number of Letters by Region



## Top Issues: AK and Pacific NW

- Total number of substantive comments:
  - Total: 6298
  - Alaska: 2838
  - Pacific Northwest: 779
- Issues which made the Top 10 list for both areas:
  - » Economic and Socioeconomic Impacts
  - » Alternative issues (scope/range/specific ideas)
  - » Data Quality and Uncertainty Issues
  - » Limits (TAC/MSY/PSC)
  - » General/Editorial/Document Management

## Top Issues by Number of Substantive Comments



## Major concerns resulting from public commentary

- The document should be restructured in a way to assess the effects of one or more ecosystem-based alternatives.
- The SEIS and the 2000 BiOp have conflicting objectives, assumptions, and terms.
- The SEIS public process did not adequately include Native Alaskans and tribal governments.
- Greater consideration and emphasis should be given to Traditional Ecological Knowledge.



- The SEIS should include a greater discussion of uncertainty and recommend a research and monitoring plan.
- Recent data needs to be incorporated into the SEIS including:
  - 2000-2001 Steller sea lion research
  - Recommended changes to the Observer program
  - New information regarding implementation of the American Fisheries Act

- The ranking system for the magnitude and significance of effects appears arbitrary and should be revisited
- MSY-based management should be more fully evaluated with alternative management strategies developed
- The impacts of alternatives on subsistence use of resources were not adequately addressed

- The structure and length of the document made it difficult to understand
- There remains substantial confusion regarding the purpose of a programmatic EIS compared to an action specific EIS
- The present management regime could be better represented as a dynamic, responsive system

# STEPS IN THE NEPA-EIS PROCESS

STEPS

YOU ARE HERE



**Federal Notice of Intent (NOI) to Prepare Programmatic SEIS**  
October 1, 1999

1

**Scoping**  
Scoping Period October 1 - December 15, 1999  
Scoping Report Issued - March 27, 2000

2

**Draft SEIS Issued**  
Draft EIS is published and made available for a 150-day public review  
January 26 - July 25, 2001

3

**Public Comment Review and Synthesis**  
Ongoing

4

**Legal / Policy Decisions Made Concerning Next Step**

5



**OPTION A**

**OPTION B**

**Respond to Comments / Revise SEIS**

**Respond to Comments / Revise Draft SEIS**

6

**Council / NMFS Select Preferred Alternative**

**Council / NMFS Select Preferred Alternative**

7

**Issue Final SEIS**  
Available for minimum 30-day public review

**Issue Second Draft SEIS**  
Available for minimum 45-day public review

8

**Repeat and follow steps 4, 5, 6a to 8a**

**Record of Decision**  
Public statements of agency decisions

9