

PEIS Discussion Framework for Ecosystem Committee

The Council and staff are seeking input on development of a purpose and need and alternatives for the Programmatic EIS. Ideas are welcome and may be provided in any format, however, the questions below aim to help frame the work on the Programmatic and assist the Committee in developing a purpose and need statement and identification of alternatives. The [staff discussion document](#) should provide you context for answering the following questions. *(Please note that page 1 of the discussion document contains the same questions that are on this form.)*

Any answers are, by no means, meant to be final, and the purpose of the questions is to help organize thoughts and to stimulate discussion at the April 2023 Committee meeting. Staff will organize and compile these answers for Committee discussion.

You do not need to answer every question and you have the option to go back and change your responses after submitting the form. You can also submit more than one response to this form.

Please submit your response(s) no later than Monday, March 27th.

Please enter your name in the space below. *

Steve Marx

If applicable, please enter your organization or affiliation in the space below.

Pew Charitable Trusts

1. Why does the Council need to reinitiate a Programmatic evaluation at this time?

The existing programmatic EIS under which the Council currently operates does not address the dramatic and increasing changes in the marine environment that have occurred since it was developed in 2004, nor does it adequately address the full suite of direct, indirect and cumulative impacts of federal fisheries on the marine ecosystem, including Indigenous communities, within the context of climate change.

2. What outcome(s) do you want to achieve through this process?

A clear and robust evaluation of the full suite of direct, indirect and cumulative impacts of federal fisheries in the North Pacific. The evaluation should account for uncertainty in future climate scenarios, including declining productivity, shifts in species distributions and abundance, habitat loss and fragmentation, changes in food web dynamics, etc. The process should also meaningfully engage Tribes and Tribal organizations, including the incorporation of Tradition Knowledge as a fundamental component of the best scientific information available.

3. What scope would you like to see for the new policy?

- *Focused on groundfish fishery, specific species, or all Council-managed fisheries?*
- *A broader or specific geographic range?*
- *Affecting all the management policy or specific components?*

Ideally the scope of the PEIS would include all of the Councils FMPs. However, we also understand that the level and breadth of the evaluation should be commensurate with the role of the FMU species in the ecosystem as well as the impact of the respective fishery on the broader ecosystem and associated social, ecological and economic considerations.

4. What changes would you like to see to the current groundfish management policy and its nine goals and suite of 45 objectives?

The goals and objectives can be found [here](#).

- *Do you feel there are any management goals and/or objectives that need to be added to a new management policy? If so, what are they?*
- *Are there any management goals and/or objectives that have not been prioritized enough in Council decision making? If so, which ones?*
- *Are there any management goals and/or objectives with which you no longer agree, or which need language to be updated? If so, which ones?*

The current groundfish management goals and objectives are not necessarily wrong, misplaced, or out of date. We feel that they remain relevant and could provide a useful framework in moving forward in this PEIS process. The question the Council should rather be asking is whether and how it has made progress in achieving its stated goals and objectives, in particular those related to bycatch reduction, sustainable communities, habitat conservation, equitable use, marine mammals, and Tribal consultation. The PEIS should consider alternative management approaches that may better achieve/advance the Council's existing goals and objectives.

5. Are there any specific regulatory or management-related steps you can think of at this time to better align the Council with future purpose and management objectives?

These may not necessarily end up being folded into the Programmatic, but can provide additional illustration as the Committee and Council decide how to structure alternatives.

The Council should consider amending its FMPs to better and more clearly assess, specify and account for all of the relevant social, ecological and economic factors necessary for the determination of OY, in particular within the context of a changing climate. The current description of OY mostly references the 1981 FEIS and the 2004 PSEIS, and limits the discussion of social and economic factors to direct impacts to the industry. That description should be updated to better reflect a concept of optimum yield that is not just an amount of fish, but that also captures the full suite of factors associated with that level of removals on an annual basis. The FMP also states that, "OY may need to be respecified if major changes occur in the ecological, social, or economic factors governing the relationship between OY and MSY." We believe that major changes have occurred and are increasingly occurring, and thus a reconsideration of what constitutes OY is warranted.

6. Additional Comments

If you have any additional comments you would like to share, please use the space below.

We understand that this process will be iterative and that anticipated outcomes and outputs will change accordingly. However, we hope and believe that this process will provide meaningful opportunities to fundamentally consider the Council's existing management framework, and potential changes or alternative approaches that may better allow the Council to fulfill its conservation and management obligations. Thank you very much for your time and commitment to this process.

This form was created inside of National Oceanic and Atmospheric Administration.

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