

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. *

Chris Tran

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

Aleut Community of St. Paul Island

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

A robust National Environmental Policy Act (NEPA) analysis should set the stage for meaningful change in management. It is important to consider the cumulative impacts of the federally managed groundfish fisheries in relation to impacts on Indigenous communities, Alaskan communities, subsistence needs and impacts to other fisheries.

Changes to marine ecosystems stemming from various factors including commercial fishery behavior and the management of it, as well as other environmental changes, have disproportionately impacted Tribes. With the unprecedented rate of change in the North Pacific, existing NEPA analyses do not adequately address changing climate or incorporate Indigenous Knowledge. The Council and National Marine Fisheries Service (NMFS) have an obligation under the law to address those deficiencies through a NEPA process that prioritizes opportunities for public input. There has been recognition of significant necessary changes to the management of the Alaska offshore federal fishery since the last programmatic in 2004 which need to be fully realized and implemented. This includes the failure to meet the mandate in National Standard 2 to incorporate Traditional Knowledge, agency failures regarding Tribal Consultation, and the need to systematically incorporate an Ecosystem-Based Fisheries Management approach to fisheries management.

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

Management must consider new frameworks and actions to address high variability associated with climate change that considers broader ecosystem and community changes as well as the sustainability of target fisheries. Tribal entities must be robustly and meaningfully included at all stages of a programmatic process. The Council and NMFS should immediately begin outreach for PSEIS input from Tribal entities and communities. Tribe entities should be engaged from the beginning through the end, including in the drafting of key language like purpose and need and alternatives. This includes outreach, two-way engagement, and Consultation. The Council should ensure that Tribes are involved in both informal and formal scoping. Formal scoping includes Tribal consultations and public engagement that is outside of the Council process. Informal scoping includes Council testimony, working committees, and workshops. The Ecosystem Committee is an opportunity to draft an updated PSEIS purpose and needs statement. Language about Tribal engagement and groundfish fisheries impacts towards Tribal communities should be incorporated.

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?*

The scope should extend to include socio-ecologically important species such as crab, salmon and other key predator/prey species associated with groundfish fisheries.

The scope of the policy should cover a broad geographic range which includes the Gulf of Alaska, Bering Sea, and Aleutian Islands. All of the large marine ecosystems in the North Pacific are a connected and an overarching management policy should approach the vast ocean region in a holistic manner.

A broader examination of the way all of the federal fisheries are understood and managed in light of highly-changed current and projected ecosystem characteristics; the diversity of values, knowledge, needs, and stewardship practices which exist that have relevance to the marine ecosystem and the engagement of fishery resources within it; and in light of the epistemic, processual and management advances the Alaska federal fishery management system has made and recognizes needs to be made.

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?*

Aleut Community of St. Paul Island (ACSPI) supports goals towards co-management of fisheries with Tribes and co-production of knowledge with Tribes. To ensure the sustainable and integrated well-being of communities, ecosystems, and economies broadly considered.

Under goal 5, ACSPI supports the addition to advance the conservation of northern fur seals. Management goals should consider current research of fisheries interactions with northern fur seals and address the on-going decline of fur seals in the Bering Sea.

Overall many of the items need to be updated and expanded on. What has been the progress on these items since the last PEIS? There should be consideration on the process on how these policies become actionable items and results. With the unprecedented rate of ecosystem change in the North Pacific, fisheries management needs to be structurally ready, flexible, responsive, adaptable, sustainable, collaborative, diversely informed, and equitable.

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.

To ensure Tribal representation on all Council bodies; ensuring sufficient social science capacity is in place on Council bodies, Council staff, and at the Alaska Fisheries Science Center; a robust system for integrating LK, TK, and subsistence information, including for both short (e.g. rapid) and long term management actions; and requiring incorporation of Tribal Consultation information into Council analyses and decision-making processes before final action.

6. Additional Comments

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

The new Programmatic should build on the progress made with regard to ecosystem based management committee and Tribal involvement in the federal fishery management process. For example implementation of the LKTKS taskforce recommendations, community engagement committee and continued implementation of the vision of the Bering Sea FEP.

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