



May 3, 2023

Bill Tweit, Chairman  
Ecosystem Committee  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501

**Re: Comments regarding Programmatic EIS Draft Purpose and Need Statement and Scope and Framework for Alternatives**

Dear Chairman Tweit and members of the Ecosystems Committee of NPFMC,

Please accept the following comments from SalmonState. SalmonState thanks this Committee for the opportunity to comment regarding the draft purpose and need statement and alternatives for a Programmatic EIS by the North Pacific Fishery Management Council (“NPFMC”) Ecosystem Committee. SalmonState has previously submitted comments to the NPFMC and this Committee encouraging a comprehensive National Environmental Policy Act (NEPA) review process. We are encouraged that this Committee recognizes the need for a comprehensive environmental review and has commenced a process to develop a preliminary description of a purpose and need statement and potential alternatives. SalmonState continues to urge this Committee and the Council to approach a NEPA review process with a goal of informing equitable, climate adaptive, and Ecosystem Based Fisheries Management (“EBFM”) in the North Pacific, that results in the necessary changes in decision-making of the federal fisheries.

SalmonState, an Alaska based conservation effort, works to protect salmon habitat, and promote policies that will guarantee Alaska remains the SalmonState; the home of the world's largest, healthiest and most abundant wild salmon resource, which provides culture, food, income, employment and recreation to Alaskans, Americans and the rest of the world. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

The purpose and need for the Programmatic Environmental Impact Statement (“PEIS”) should be constructed by this Committee to clarify that the PEIS analysis scope will include the status of the Bering Sea and Gulf of Alaska ecosystems and establish a new environmental baseline, the cumulative impacts of implementing federal fisheries management decisions on non-target marine living resources and habitat, coastal and inland communities, and Alaska Native people

and cultures. The purpose and need should further clarify that the PEIS is not simply an update of the outdated 2004 Programmatic Supplemental EIS and 2015 Supplemental Information Report, but a comprehensive NEPA analysis of the Bering Sea and Gulf of Alaska that will inform the EBFM regime for all federally managed fisheries. The 2004 PSEIS and 2015 SIR are narrow in analysis, goals, and outcomes. The single species standard analyzed in the 2004 PSEIS that continues to be the basis of management decisions by the Council and NMFS inherently burdens and devalues all fisheries and dependent communities outside of the federally managed groundfish fisheries. While EBFM was introduced in the 2004 PSEIS, the concept was in its infancy and not widely applied in fisheries management. The development of EBFM over the past two decades through NMFS nationally and in international waters by other countries has crystalized some of the best practices for an ecosystem approach to fisheries management. The PEIS should cover those updates and improvements to fisheries management and reflect the 2016 EBFM policy by NMFS and 2019 implementation plan by the Alaska Region. EBFM should also include the impacts and interactions of the people and communities of the region, including coastal and upriver communities that fish and depend on anadromous species intercepted in the ocean by federally managed fisheries.

Additionally, it is imperative that the PEIS include an evaluation of the cumulative impacts of climate change and federal fisheries management decisions on subsistence and cultural and traditional use resources. As evident in the past several years, the NPFMC decision-making process in managing the Bering Sea and Gulf of Alaska federal groundfish fisheries impacts Alaska Native peoples and communities. The closure of subsistence and direct target fisheries in Western Alaska have a direct and devastating effect on communities along the Yukon and Kuskokwim Rivers that depend upon those fish for income, food security, and the passing on of Alaska Native traditions and cultural practices. These communities have been underserved and underrepresented in federal fisheries management decisions and in the 2004 PSEIS and subsequent 2015 SIR. Furthermore, for an adequate review process and in pursuit of the Administration's Executive Orders regarding equity and Nation-to-Nation relations and NOAA's Equity and Environmental Justice strategy and policy, this Committee and the Council should make clear that Tribal representatives and Indigenous peoples are an integral part of development of this NEPA analysis and provide clarity that PEIS analysis will include Traditional Ecological Knowledge and a robust analysis of impacts to subsistence resources and Alaska Native communities.

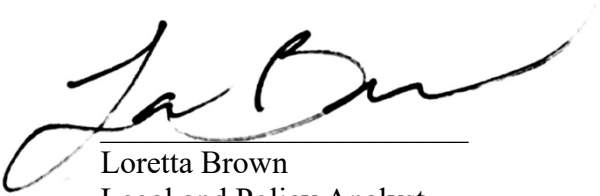
In development of a range of alternatives, this Committee and the Council should clarify that the outcomes of the NEPA process will include directives for real and immediate action to reduce impacts of implementing federal fisheries management on non-target bycatch species, coastal and inland communities, and Alaska Native culture and traditions. Each of the alternatives considered should include, at minimum, more management measures for a climate adaptive fisheries management, reduce impacts of federal fisheries on non-target living marine resources and habitat, incorporate EBFM and Equity and Environmental Justice criteria in establishing the optimum yield range of a target fishery, and include Alaska Native interests and knowledge in federal fisheries decisions.

As discussed above, this NEPA analysis process must include a more comprehensive review of the Bering Sea and Gulf of Alaska, as a simple update to the 2004 groundfish fisheries NEPA

analysis would have limited applicability and cannot fully inform fisheries management decisions and implement the Ecosystem Based Fisheries Management and Equity and Environmental Justice policies as directed by NOAA.

Finally, SalmonState encourages this Committee and the Council to adopt a purpose and need statement and a preliminary description of the range of alternatives within this meeting cycle to allow NMFS to commence the NEPA review process with scoping in a timely manner. We thank you for the opportunity to comment. Please contact Loretta Brown at [loretta@salmonstate.org](mailto:loretta@salmonstate.org) with any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Loretta Brown', written over a horizontal line.

Loretta Brown  
Legal and Policy Analyst  
SalmonState  
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