

# 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. \*

John Iani

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

NPFMC Ecosystem Committee Member

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

I am not certain the Council needs to redo the Programmatic EIS at this time. I believe the current programmatic EIS provides all the tools necessary for the Council to evaluate the North Pacific Ecosystem as it pertains to the Council's management obligations pursuant to the MSFMCA. I do support the Council's review of the goals and management objectives in a wholistic sense to ensure that they reflect the current state of the changes occurring in the ecosystem.

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

Better and more wholistic ecosystem inclusive fisheries management.

### 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?*

I think the scope needs to be broad (all Council-managed fisheries); within the geographic jurisdiction of Council managed fisheries; and affecting all management policies. But the scope needs to encourage and allow specific review of specific sub-areas where information is presented and needs for management changes are pressing. The scope should allow the Council to take appropriate actions as necessary in these sub-areas without having to formally review the entire management of the Council. The scope needs to allow nimble and relatively expedient changes that become necessary.

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?*

I believe that known changes due to climate variations are now documented and occurring with some regularity. I think the current list of goals are sufficient and provide all the Council needs to review and or impact ecosystem management. However, I think all current goals should have a 'climate change circumstance' question or issue defined in each of the goals' management policy. Each of the management objectives could incorporate climate change information into their review by the Council.

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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.*

I think adaptive management needs to be emphasized as a valuable tool for Council action. Too many Council management actions take too much time to implement. It is important to balance the process protections in fishery management decisions but delay can be devastating especially in light of rapidly changing ecosystem impacts.

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## 6. Additional Comments

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

I believe the current programmatic EIS; goals and management objectives are robust and contain all the necessary tools. I do not believe creating a new programmatic, without a justification for doing so, makes much sense. Rather, the Council needs to make decisions about which management objectives are the most critical given the current state of the BSAI and GOA ecosystem indicators. The Council should not let (seeking perfect information) be the enemy of the good (making decisions based on the current state of the science presented). Waiting for "more" will always be attractive but can be very counterproductive.

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

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