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April 1, 2014

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

Dr. James Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

**RE: Agenda Item D-3, Programmatic Supplemental Environmental Impact Statement,  
Supplemental Information Report**

Dear Mr. Olson, Dr. Balsiger, and Council members:

The Council and National Marine Fisheries Service (NMFS) currently are considering revisions to the Programmatic Supplemental Environmental Impact Statement (PSEIS). Council and NMFS staff prepared an extensive Supplemental Information Report (SIR) which will be reviewed at this meeting. To allow for full public review and an informed choice about how best to move forward on this important issue, we recommend that the Council and NMFS allow additional time for public comment on the SIR. The Council and NMFS could accept public comment on the SIR for the next 60 days and establish a process that could begin at a future Council meeting to determine whether and how to update the PSEIS.

The PSEIS was completed in 2004 in response to litigation. *See, e.g., Greenpeace v. National Marine Fisheries Service* (W.D. Wash. 1999). It is “the central environmental document supporting the” Fishery Management Plans for the groundfish fisheries in the Bering Sea, Aleutian Islands, and Gulf of Alaska “and thus provide[s] agency decisionmakers and the public with information necessary for making informed decisions in managing the groundfish fisheries and for setting the stage for future policy decisions and management actions.” *See* PSEIS at I-1. The PSEIS, therefore, is an important tool for the Council and NMFS, and decisions about whether and how to update it should be made carefully.

The information and analysis in the PSEIS also has significant implications for the Council’s commitment to moving toward ecosystem-based management. It is an appropriate vehicle through which to give serious consideration to the large-scale impacts of commercial fisheries on the ecosystem and to think broadly about how best to ensure vibrant ocean ecosystems that support vibrant fisheries.

We commend Council and NMFS staff for preparing an extensive SIR and the appendix to it. Given the importance of the issue, the extensive amount of information, and the challenging questions presented, we request additional time to review the documents and provide substantive comment. We recommend that the Council and agency accept public comment on the SIR for 60 days and begin a process at a future meeting to determine how best to move forward.

Thank you; and we look forward to working with you on this important issue.

Sincerely,

Susan Murray,  
Deputy Vice President, Pacific  
Oceana