

# 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. \*

Becca Robbins Gisclair

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

Ocean Conservancy

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

The marine environment is changing rapidly and unpredictably, and the system of management currently in place is ill-equipped to address those changes. Historic baselines do not necessarily represent future conditions we can expect to see in the next 10-50 years.

In particular, the system was not set up to be responsive to rapid climate change and does not adequately incorporate Indigenous Knowledge, Tribal perspectives or ecosystem components beyond target species that are needed to ensure resilience, adaptation, and sustainability. The current system also does not account for subsistence needs or opportunities in a systemic way

Management must consider new frameworks and actions to address high variability associated with climate change in a way that meaningfully considers broader ecosystem and community sustainability as well as target fisheries. The Council and agency must take steps to address these problems and to ensure that future management provides sustainable and equitable fisheries while maintaining and enhancing community resilience, food security, and ecosystem function. The NEPA process can provide a framework for evaluation of new approaches and a basis of information from which to make informed choices about future direction. And a programmatic NEPA document is an ideal chance to move beyond business-as-usual and consider new tools and ways of approaching management in the face of climate change.

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

Despite the significant amount of ecosystem and climate information presented to the Council annually, many action items emphasize single-species management and economic considerations over equity and ecosystem function.

A programmatic NEPA document should lay the groundwork for meaningful change in the way fisheries are managed that is ecosystem-based and accounts adequately for social and ecological considerations. This process should lead to a new and improved management system that is inclusive of Tribes and Indigenous knowledge and responsive to the current environmental context. This process should move towards collaborative approaches to management with Tribes, and meaningful engagement of Tribes and Tribal entities throughout the process

### 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 new policy should focus on all federally-managed species in the Gulf of Alaska, Aleutian Islands and Bering Sea. It should not be limited to FMP-managed groundfish fisheries.

### 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 new policy should focus on all federally-managed species in the Gulf of Alaska, Aleutian Islands and Bering Sea. It should not be limited to FMP-managed groundfish fisheries.

### 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.*

Please see additional comments submitted by Ocean Conservancy.

## 6. Additional Comments

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

Please see additional comments submitted by Ocean Conservancy

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