

## 1 **Programmatic EIS: Background**

2 A Programmatic Environmental Impact Statement (Programmatic EIS) should  
3 constitute the central environmental document supporting the Federal Fishery  
4 Management Programs in the Alaskan Exclusive Economic Zone. The last time NOAA  
5 and the Council performed a programmatic review of federal fisheries management in  
6 the Alaska EEZ was completed in 2004 through the Programmatic Supplemental EIS  
7 (PSEIS) for the Groundfish fisheries of the Gulf of Alaska and the Bering Sea/Aleutian  
8 Islands and their respective Fishery Management Plans (FMPs) for each region.

9 The 2004 PSEIS, focused on the groundfish fisheries, was perhaps the most  
10 comprehensive analysis performed by NOAA Fisheries and the Council for the federal  
11 fisheries in Alaska. The objectives were intended to be durable, and the Council  
12 worked to implement specific policies adopted pursuant the 2004 PSEIS over the next  
13 several years, through the groundfish work plan, resulting in a number of important and  
14 groundbreaking fishery management policies and programs.

15 While the PSEIS was comprehensive for its time, the escalating and far-ranging effects  
16 of climate change were not anticipated during the preparation and adoption of the 2004  
17 PSEIS. The effects of climate change affect all species and fisheries managed pursuant  
18 to federal FMPs and regulations in all geographic regions that make up the Alaska  
19 EEZ, and we now understand that the current rate of change is substantially faster than  
20 was previously known. In light of this reality, the Council needs a broad analysis that  
21 evaluates both the effects of climate change on the ecosystems and fisheries in the  
22 Alaska EEZ, and also how those effects impact the processes used by the Council and  
23 NOAA to engage the public, including Indigenous communities and tribes. Unlike the  
24 2004 PSEIS, this new analysis should encompass a scope beyond just the groundfish  
25 fisheries but should also consider the Council's management framework across all its  
26 managed fisheries. Federal fishery management programs for the Alaska EEZ are  
27 intertwined and interconnected in a manner not envisioned in 2004, and the analysis  
28 needs to consider the interactions between the various components of the management



29 system for numerous fisheries, species, and geographical areas.

30 In the early 2000's, NOAA Fisheries and the Council chose to develop a programmatic  
31 analysis in recognition of the "significant changes [that] have occurred in the resource  
32 and its environment over the past 20 years." At that time, the EIS documents  
33 supporting the groundfish FMPs were roughly 20 years old with outdated analyses and  
34 data. While the NEPA documents that support recent individual Council actions are  
35 more robust than pre-2000, the situation is strikingly similar in that the environmental  
36 condition is substantially different; the fisheries have evolved as limited access  
37 privilege programs and other allocation mechanisms have been implemented; new  
38 participants and interests have emerged; and the socio-economic landscape is markedly  
39 different than in 2004 including the growing interest and capacity of Alaska Native  
40 Tribes and tribal entities who are seeking a meaningful voice in the management  
41 process.

