

1 **Programmatic EIS: Purpose and Need**

2 Purpose

3 The purpose is to examine and as necessary, revise the current fishery management
4 policies and procedures affecting the human environment in the Exclusive Economic
5 Zone off Alaska across all Council-managed fisheries. Given changing conditions in
6 the fisheries and the environment that have occurred since 2004, is the current
7 management framework, including the policies and procedures that guide fishery
8 management, adequate to meet the challenges of climate change? Does our
9 management framework appropriately recognize the rights and needs of Alaskan tribes
10 and subsistence cultures? Are our current allocation schemes and fishery limited
11 access privilege programs (LAPPs) meeting the objectives that were envisioned when
12 they were implemented? Is our science-management interface operating
13 effectively? The analysis will develop and evaluate a reasonable range of alternatives
14 for amending management policies and procedures so that an updated and robust
15 NEPA document, considered in an MSA environment, can support, improve, and guide
16 federal fishery management programs and actions now and into the future.

17 18 Need

19 There is an urgent need to evaluate potential changes to fishery management policies
20 and procedures in the Alaska EEZ in light of the rapidly escalating effects of climate
21 change on marine ecosystems in Alaska. This evaluation will include a comprehensive
22 review of the individual and cumulative effects of all federal fishery management
23 programs in the Alaska EEZ. Climate related environmental change has affected a
24 broad range of ecosystem components. In the past decade alone, there have been
25 several dramatic fishery collapses for target species such as Bering Sea crab and Gulf
26 of Alaska cod, and numerous other target species have significant if less dramatic



27 declines. Additionally, non-target species are also experiencing serious population
28 declines. The dramatic declines of Western Alaska chinook and chum salmon stocks,
29 which are not making enough escapement to meet biological requirements stands out.
30 Other effects are less well known or prominent, such as the effects of warming on
31 marine habitats, the slow march by some species northward, and effects on food webs
32 and basic marine productivity.

33 The far-reaching effects of climate change affect all species, and all regions, in the
34 Alaska EEZ. They also affect multiple aspects of the fishery management process.
35 Rights based fishery management programs are most successful under relatively static
36 conditions, but changing conditions can have dramatic effects on how these programs
37 perform. Climate related impacts to non-target species can have differential impacts on
38 fishery participants and gear groups. Climate related impacts on subsistence resources
39 can have dramatic impacts to the cultures, economies, and communities of Alaska's
40 Indigenous peoples.

41 While the Council and NOAA Fisheries have conducted NEPA related analyses on
42 individual actions, and other reviews have taken place such as the 2015 SIR review of
43 the PSEIS, EFH 5-year reviews, or program and allocation reviews, there has not been
44 a hard look at the individual and cumulative ecosystem effects and impacts to the
45 human environment of the federal fisheries management programs off Alaska. A
46 programmatic NEPA analysis and EIS provides the best avenue for taking a hard look
47 at the matrix of fisheries, resources, and people affected by climate change, and the
48 policies and procedures needed to address these issues, to inform potential changes to
49 current fishery management policies and procedures.

50



51 **Programmatic EIS: Scope and Framework for Alternatives**

52 The federal action under consideration is amending the management policies and
53 procedures in all federal fisheries managed under the Magnuson-Stevens Act and the
54 Halibut Act for fisheries in the Gulf of Alaska, the Bering Sea and Aleutian Islands,
55 and Arctic regions.

56 The analysis should focus on four foundational pillars of the federal fishery
57 management regime most affected by climate related impacts:

- 58 1. **Ecosystem effects and EBFM.** The analysis could look at current policies and
59 practices to determine if they meet the emerging challenges facing the marine
60 ecosystems, fisheries, and management processes in Alaska. Are current policies
61 forward looking, allowing the management regime to anticipate and proactively
62 address ecosystem effects from climate change or other challenges? Do the current
63 policies or practices account for the needs of non-target species or enhance
64 ecosystem resilience? Have appropriate ecosystem indicators been identified, and
65 are there improvements that can be made to the management system to utilize
66 information regarding the status of these indicators to strengthen conservation and
67 management? The analysis should consider and identify additional policies or
68 practices to enhance the evolution of EBFM.
- 69 2. **Current allocations and LAPP fishery management programs.** The Council has
70 performed evaluations of individual LAPPs and fishery allocations. But there has
71 not been a review of these programs taken together, that looks at the cumulative
72 effects of these programs, and whether they are meeting their original intent. The
73 promotion of LAPPs was a key component of the 2004 groundfish management
74 policy. Are there challenges or unanticipated consequences from such programs to
75 fishery participants, fishing communities, or fishing economies, particularly in the
76 context of rapid environmental change? Have federal fishery management
77 programs resulted in unanticipated and/or unnecessary restrictions or impediments
78 to participation in entry level fisheries, or do fishery management programs provide
79 opportunities for entry level participants to work their way up in the fisheries? Do



80 LAPPs and sector allocations provide opportunities for improved fishery practices
81 such as bycatch avoidance or improved efficiencies? The analysis should explore
82 the performance of existing programs as well as the challenges and opportunities
83 arising from LAPPs and allocations. The analysis should consider and identify
84 potential conservation benefits through improved fishery practices as well as
85 opportunities or challenges to entry level participation in federal fisheries.

86 3. **Tribal and Indigenous engagement.** The impacts of federal fisheries on the
87 cultures, economies, and subsistence ways of life in rural Alaska communities are a
88 rapidly growing area of concern in the federal fishery management process.

89 Concerns regarding the impacts of federal fisheries on subsistence resources and
90 the Indigenous cultures and communities supported by those resources have
91 dramatically escalated in recent years. This is true for all regions of the Alaska
92 EEZ. The recognition of Tribes in Alaska, coupled with the growing interest and
93 capacity of Tribal entities were not anticipated in 2004, and warrant special
94 attention. The Council has taken several steps and actions to improve and facilitate
95 engagement with Tribes and Indigenous peoples, especially in rural Western
96 Alaska. But current engagement with Indigenous peoples and Tribes has largely
97 been through an ad hoc mix of committees, work groups and task forces. The
98 analysis should review these initiatives to consider and identify policies and
99 procedures that can build on these initial steps to ensure that Indigenous peoples
100 and Tribes have a meaningful role in the fishery management process.

101 4. **The Intersection of Science and Management.** There is an urgent need to better
102 understand the effects of climate change on the ecosystems and fisheries of the
103 Alaska EEZ. Developing a more robust knowledge base is necessary to fully
104 understand, anticipate, and address the effects of climate change. This knowledge
105 base should include both western science as well traditional Indigenous knowledge.
106 There are several processes at play to inform the scientific process regarding the
107 needs and priorities for federal fishery management in Alaska. The Council's SSC
108 provides a list of research priorities, which are approved by the Council and then
109 forwarded to the Alaska Fishery Science Center and entities like the NPRB. In
110 addition, NOAA develops its own research priorities which may or may not align



111 with the research priorities of the Council and the interested public. The role of
112 Indigenous knowledge (IK) remains unclear, but IK certainly offers opportunities
113 to improve the overall understanding of climate change related impacts. Would
114 improved communication, coordination and expanded funding for research and
115 analysis benefit the scientific and management processes? How can IK be better
116 incorporated into the process? What mechanisms might be employed to accomplish
117 these goals? The analysis should look at opportunities for building a stronger and
118 more robust knowledge base to inform fishery management.

