



Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 W. 3rd Avenue, Suite 400
Anchorage, AK 99501

June 2, 2023

Jon Kurland, Regional Director
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

Re: D2 Programmatic EIS Discussion

Dear Chair Kinneen and Council Members,

SalmonState appreciates the opportunity to submit comments to the North Pacific Fishery Management Council (“NPFMC”) regarding the Ecosystem Committee’s report, draft purpose and need statement, and range of alternatives for a Programmatic NEPA analysis. SalmonState has previously submitted comments¹ to the NPFMC, including the Ecosystems Committee, encouraging a comprehensive National Environmental Policy Act (NEPA) review process. We continue to urge NPFMC to approach a NEPA review process with a goal of informing equitable, climate adaptive, and ecosystem-based federal fishery management in the Bering Sea and Gulf of Alaska.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a Salmon State by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

As mentioned in numerous comment letters² from SalmonState to this Council and the Ecosystems Committee regarding the undertaking of a NEPA analysis for federal fisheries in the Bering Sea and Gulf of Alaska, the 2004 Programmatic Supplemental Environmental Impact Statement (“PSEIS”) and 2015 Supplemental Information Report (“SIR”) for the groundfish fisheries in the Bering Sea Aleutian Islands and Gulf of Alaska are outdated and can no longer adequately inform this Council or NOAA Fisheries of appropriate management measures to fulfill both entities’ responsibilities under MSA. Since the publication of the 2004 PSEIS for Groundfish in the Bering Sea and Gulf of Alaska, ocean conditions, habitat, and fish populations have changed dramatically. The Bering Sea and Gulf of Alaska have already endured and are currently experiencing radical changes. Rising ocean temperatures are altering the marine

¹ See, previous SalmonState comments attached to this letter.

² *Id.*

ecosystem and changing fish species distribution and productivity, leading to a series of cascading impacts to the marine ecosystem and the people who depend on its resources. To better inform future federal fisheries management and correct the current management failings, this Council should recommend to NOAA Fisheries that the agency conduct a comprehensive NEPA review of the Bering Sea and Gulf of Alaska federal fisheries management and ecosystems.

SalmonState provides the following recommendations regarding the Ecosystem Committee Recommendations for PEIS and May 2023 Ecosystems Committee Report³:

This Council should clearly state the NEPA analysis scope will include a comprehensive analysis of the cumulative impacts of climate change and federal fisheries management of the Bering Sea and Gulf of Alaska and is not simply an update or supplement to the 2004 PSEIS and 2015 SIR for the groundfish fisheries. The new NEPA review should contain an analysis of the status of the Bering Sea and Gulf of Alaska ecosystems, establish a new environmental baseline, examine the cumulative impacts of implementing federal fisheries management decisions on non-target marine living resources and habitat, coastal and inland communities, and Alaska Native people and cultures.

The Council should clearly specify that one of the goals and purposes of the NEPA analysis is to guide implementation of NOAA Fisheries' Equity and Environmental Justice Strategy⁴, Ecosystem-Based Fisheries Management Policy⁵, and the Local Knowledge, Traditional Knowledge, and Subsistence Protocol⁶ developed by this Council's LKTK Task Force.

All action alternatives considered by this Council and NOAA Fisheries should reflect the incorporation and implementation of EEJ strategy, EBFM policy, and LKTK protocol in all federal fisheries management decisions by this Council and the agency in the Bering Sea and Gulf of Alaska. In development of a range of alternatives, this the Council and NOAA Fisheries should clarify that the outcomes of the NEPA process will include directives for real and immediate action to reduce impacts of implementing federal fisheries management on non-target living marine resources, coastal and inland communities, and Alaska Native culture and traditions, undertake management measures

³ <https://meetings.npfmc.org/CommentReview/DownloadFile?p=2b296e82-8f3c-4a80-8af2-9e1d3e72a92c.pdf&fileName=D2%20Ecosystem%20Committee%20Recommendations%20for%20PEIS.pdf> and <https://meetings.npfmc.org/CommentReview/DownloadFile?p=b02cb123-fc5c-49e4-9c42-0dc41ebc73fa.pdf&fileName=D2%20May%202023%20Ecosystem%20Committee%20Report.pdf>

⁴ NOAA Fisheries, Equity and Environmental Justice Strategy, May 2023, <https://media.fisheries.noaa.gov/2023-05/NOAA-Fisheries-EEJ-Strategy-Final.pdf>

⁵ NOAA Fisheries, Ecosystem-Based Fisheries Management Policy, February 2018, <https://www.fisheries.noaa.gov/resource/document/ecosystem-based-fisheries-management-policy> and NOAA Fisheries, Ecosystem Based Fisheries Management Alaska Region Implementation Plan, April 2019, https://media.fisheries.noaa.gov/dam-migration/ak_ebfm_final_april2019.pdf

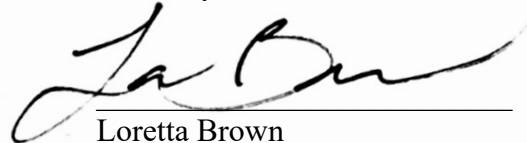
⁶ NPFMC LKTK Task Force, Protocol for Identifying, Analyzing, and Incorporating Local Knowledge, Traditional Knowledge, and Subsistence Information in the North Pacific Fishery Management Council's Decision-making Process, March 2023, <https://meetings.npfmc.org/CommentReview/DownloadFile?p=be2fe4dd-ea5b-47f9-b829-be1e2e09c5ee.pdf&fileName=LKTKS%20Protocol.pdf>

for a climate adaptive fisheries management, and implement the EEJ strategy, EBFM policy, and LKTK protocol in all federal fisheries decisions.

SalmonState strongly supports the comments and recommendations submitted to the Ecosystems Committee from Western Alaska Native and subsistence entities, including those submitted by the Kuskokwim River Inter-Tribal Fish Commission,⁷ Association of Village Council Presidents and Tanana Chiefs Conference,⁸ Kawerak, Inc.,⁹ and the Aleut Community of St. Paul Island.¹⁰ We urge this Council to adopt those recommendations set forward in those comment letters listed here in the Purpose and Need statement and description of the Range of Alternatives for the NEPA analysis. We also urge this Council to encourage NOAA Fisheries to invite those entities and the Alaska Native Tribes of Western Alaska as cooperating agencies in the NEPA process, as well as engage with those entities and Tribes early and often throughout the NEPA review process in both informal and formal Tribal Consultation.

Finally, SalmonState encourages this Council to adopt a purpose and need statement and a preliminary description of the range of alternatives within this meeting cycle to allow NOAA Fisheries to commence the NEPA review process in a timely manner. We thank you for the opportunity to comment. Please contact Loretta Brown at loretta@salmonstate.org with any questions regarding these comments.

Sincerely,



Loretta Brown
Legal and Policy Analyst
loretta@salmonstate.org

⁷ https://meetings.npfmc.org/CommentReview/DownloadFile?p=3e1305f8-d34c-49df-8c67-b4005621e2d8.pdf&fileName=2023-05-04_PEIS%20EcoComm%20comment.pdf

⁸ https://meetings.npfmc.org/CommentReview/DownloadFile?p=59656eb1-ac48-4171-abfc-4c0bc2e160aa.pdf&fileName=AVCP_TCC%20Ecosystem%20Committee%20Comments_May%207%202023.pdf

⁹ <https://meetings.npfmc.org/CommentReview/DownloadFile?p=80a5081f-b54e-41fd-9af7-4ece884bee64.pdf&fileName=May2023%20PEIS%20letter%20EC.pdf>

¹⁰ https://meetings.npfmc.org/CommentReview/DownloadFile?p=0937efaa-6cfb-4b6b-b8c6-41c2324ca7b8.pdf&fileName=ACSPI_EC_PEIS%20comment_5May23.pdf



February 3, 2023

Simon Kinneen, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Jon Kurland, Regional Director
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

RE: D2 PSEIS Discussion Paper

Dear Chairman Kinneen, Director Kurland, and Council Members,

Please accept the following comments from SalmonState. SalmonState is an Alaska based and focused on supporting innovative and effective public interest projects. We work within Alaska to guarantee the State remains a Salmon State by protecting and preserving habitats and promoting fish first policies. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

I. The NEPA Review Process Should be a Comprehensive North Pacific Ecosystems and Impacts of Federal Fisheries Management on those Ecosystems, with the Purpose of Informing Equitable, Climate Adaptive, and Ecosystem-Based Federal Fishery Management

As we have stated in previous comments to the Council, SalmonState is deeply concerned with the current state of crisis in the North Pacific ecosystem. As discussed by this Council, Council staff, and NMFS, the Bering Sea and Gulf of Alaska are at the forefront of climate change, and conditions have changed dramatically since the turn of the millennia. Rising ocean temperatures are altering the marine ecosystem and changing fish species distribution and productivity, leading to a series of cascading impacts to the marine ecosystem and the people who depend on its resources. Ecologic and economic important fish populations, including but not limited to Red King crab, snow crab, Chinook salmon, and chum salmon, are experiencing steep declines. It has become evident that the current scope of review of the 2004 Programmatic Supplemental Environmental Impact Statement and other NEPA analyses for federal fisheries in the North Pacific are outdated. This scope of review is inadequate to adapt to current and future conditions, and ignore the severe burdens placed upon Alaska's most dependent—fishing participants, Alaska Native people, and coastal communities. To better inform future federal fisheries management and correct the current management regime flaws, a comprehensive NEPA process must be undertaken.

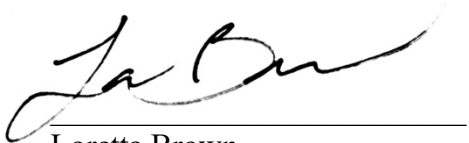
SalmonState supports the Ecosystems Committee report and recommendation,¹ “the Council move forward with initiating a North Pacific PEIS and begin the process for developing the purpose and need statement and a range of alternatives by tasking the Committee to draft a purpose and need statement for Council review.”² SalmonState also urges the Council to direct the Ecosystem Committee to engage Alaska Native Tribe representatives in the development of the purpose and need statement and range of alternatives.

II. Throughout the NEPA Review Process, NMFS and the Council Must Engage Indigenous Peoples

SalmonState encourages this Council and NMFS to invite Indigenous representation to be an integral part of the current and future decision-making processes managing the Bering Sea and Gulf of Alaska federal fisheries, including the development of a NEPA analysis for the North Pacific. Alaska Native coastal communities in Western Alaska are bearing the burden of conservation measures due to low fish abundance in species that continue to be bycaught in the federally managed fisheries. The closure of subsistence and direct target fisheries in Western Alaska have a direct and devastating effect on communities along the Yukon and Kuskokwim Rivers that depend upon those fish for income, food, and a foundation of their culture. Furthermore, the interests and concerns of these communities have been consistently underrepresented in the Council’s NEPA analysis. Any NEPA analysis conducted by this Council and NMFS must include early and ongoing Government to Government Consultation with Alaska Native Tribes and be consistent with the Presidential Memorandum on Uniform Standards for Tribal Consultation³.

We appreciate the opportunity to offer our comments. Please contact Loretta Brown at loretta@salmonstate.org with any questions regarding these comments

Sincerely,



Loretta Brown
Legal and Policy Analyst
SalmonState
loretta@salmonstate.org

¹ <https://meetings.npfmc.org/CommentReview/DownloadFile?p=ca672bd1-42b0-4fa0-8514-6e2de0a26896.pdf&fileName=D2%20Ecosystem%20Committee%20Report.pdf>

² *Id.*

³ *See*, Biden-Harris Administration Announces New Actions to Support Indian Country and Native Communities Ahead of <https://www.whitehouse.gov/briefing-room/statements-releases/2022/11/30/fact-sheet-biden-harris-administration-announces-new-actions-to-support-indian-country-and-native-communities-ahead-of-the-administrations-second-tribal-nations-summit/>



Bill Tweit, Chair
Ecosystem Commit
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

March 27, 2023

Jon Kurland, Regional Director
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

Re: Programmatic EIS Discussion

Dear Chair Tweit and Ecosystem Committee Members,

SalmonState submits the following comments regarding the call for input on development of a purpose and need and alternatives for a Programmatic EIS by the North Pacific Fishery Management Council (“NPFMC”) Ecosystem Committee. SalmonState has previously submitted comments¹ to the NPFMC encouraging a comprehensive National Environmental Policy Act (NEPA) review process. We urge this Committee and the Council to approach a NEPA review process with a goal of informing equitable, climate adaptive, and ecosystem-based federal fishery management in the Bering Sea and Gulf of Alaska.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a Salmon State by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

- I. The 2004 PSEIS is outdated. The North Pacific is at the forefront of climate change. The 2004 PSEIS is focused on the economic gains of the trawl fleet, and not responsive to the impacts of the fishery on other fish, fisheries, communities, and ecosystem, and is no longer reliable to inform the sustainability of the fisheries of the Bering Sea and Gulf of Alaska.**

Since the publication of the 2004 Programmatic Supplemental Environmental Impact Statement for Groundfish in the Bering Sea and Gulf of Alaska, ocean conditions, habitat, and fish populations have changed dramatically. The Bering Sea and Gulf of Alaska have already endured and are currently experiencing radical changes. Rising ocean temperatures are altering the marine ecosystem and changing fish species distribution and productivity, leading to a series

¹ See, https://meetings.npfmc.org/CommentReview/DownloadFile?p=503a55d6-39d0-4b04-aaaa-08bc63c87c5f.pdf&fileName=D2_PEIS_SalmonStacvte_02%2002%202023.pdf

of cascading impacts to the marine ecosystem and the people who depend on its resources. In the past several years, important fish to Alaska's economy and Alaskan's livelihoods, including halibut, crab, Chinook salmon, and chum salmon, are experiencing steep declines. It has become evident that the current scope of review of the 2004 Programmatic Supplemental Environmental Impact Statement is outdated. The 2004 review and the 2015 Supplemental Information Report are inadequate to adapt to current and future ocean conditions, and applies the National Standards in an unbalanced manner that has aggravated the severe burdens placed upon Alaska's most dependent fishing participants, Alaska Native people, and coastal communities. To better inform future federal fisheries management and correct the current management regime failings, this Ecosystems Committee should urge the Council to undertake a comprehensive NEPA review of the Bering Sea and Gulf of Alaska ecosystems.

II. Development of the PEIS should include Local Traditional Knowledge, with meaningful consultation with Alaska Native Tribes.

SalmonState encourages this Council and NMFS to invite Tribal representatives and Indigenous peoples to be an integral part of development of this NEPA analysis. As evident in the past several years, the NPFMC decision-making process in managing the Bering Sea and Gulf of Alaska federal fisheries impacts Alaska Native peoples and communities. Alaska Native coastal communities in Western Alaska are bearing the brunt of the burden of conservation measures due to low fish abundance in species that continue to be bycaught in the Bering Sea and Gulf of Alaska federally managed fisheries. The closure of subsistence and direct target fisheries in Western Alaska have a direct and devastating effect on communities along the Yukon and Kuskokwim Rivers that depend upon those fish for income, food security, and the passing on of Alaska Native traditions and cultural practices. Furthermore, the interests and concerns of these communities were underrepresented in the 2004 PSEIS analysis and the subsequent 2015 SIR. Any NEPA analysis conducted by this Council and NMFS should include early and ongoing Government to Government Consultation with Alaska Native Tribes that is consistent with the Presidential Memorandum on Uniform Standards for Tribal Consultation², as well as incorporation of local, Traditional and Ecological Knowledge.

III. Outcomes and Goals and Scope of a new NEPA analysis should be broad and comprehensive

In the development of a NEPA analysis in the face of rapidly changing ocean conditions, falling fish populations, shifting food web, and displacement of species ranges and habitat, this Committee and the Council cannot continue with business as usual. Rather, the NEPA review must be a comprehensive review that informs Ecosystem-Based Fishery Management, not with a single species or stock focused, but holistically analyzes the full ecosystem, including communities and other fisheries. A primary outcome of the NEPA review of the Bering Sea and Gulf of Alaska should incorporate conducting management of federal fisheries through true Ecosystem-Based Fishery Management; including setting Total Allowable Catch limits and Prohibited Species Catch caps for bycatch with a comprehensive look at the target fishery's impacts to the whole ecosystem, including other fisheries, communities, and habitat. Such

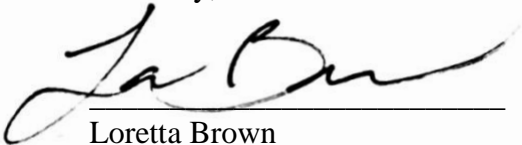
² Ahead of <https://www.whitehouse.gov/briefing-room/statements-releases/2022/11/30/fact-sheet-biden-harris-administration-announces-new-actions-to-support-indian-country-and-native-communities-ahead-of-the-administrations-second-tribal-nations-summit/>

ecosystem management should also balance the economic benefits of target fishery with the economic, cultural, and ecological devastation it causes and exacerbates, rather than giving the target fishery's economic benefits an unbalanced weight. This will help inform federal fishery management decisions that are balanced, based on the most up-to-date science, and reflective of the impacts of those decisions to the marine ecosystem.

A comprehensive NEPA review that encompasses the ecosystems within the Bering Sea and Gulf of Alaska would inform necessary updates to federal fisheries management including climate adaptive fishery management, equitable conservation measures for fish population, and scientific information that includes Traditional Ecological Knowledge. The 2004 PSEIS and 2015 SIR are narrow in focus, goals, and outcomes, with the NEPA analysis centered around the groundfish fisheries. This single-species and stock has limited applicability and cannot fully inform federal fisheries management decisions as to the ecosystem status and impacts of federal decisions on said ecosystem. The goals and objectives of the 2004 PSEIS and 2015 SIR are set at a standard to maintain and benefit the optimum yield and economic revenue of the Alaska pollock fishery. This single species standard inherently burdens all other fisheries and dependent communities because they are not substantially contributing to the success of optimum yield for the pollock fishery. The Bering Sea and Gulf of Alaska federal fisheries should be managed based on Ecosystem-Based Fishery Management, and a comprehensive NEPA analysis of the Bering Sea and Gulf of Alaska can inform such management regime in an efficient and effective manner that the 2004 and 2015 review documents are lacking. A comprehensive analysis can direct policies that create a standard that encompasses the impact on all federally managed fisheries, other species, and the dependent Alaskan and Alaska Native communities.

SalmonState is deeply concerned with the status of fish populations throughout Western Alaska and management decisions enabling wasteful practices by the Bering Sea and Gulf of Alaska pollock trawl fleet. As discussed above, SalmonState supports a comprehensive NEPA analysis of the Bering Sea and Gulf of Alaska ecosystems to update the 2004 PSEIS and 2015 SIR to better inform an Ecosystem-Based Fishery Management approach.

Sincerely,

A handwritten signature in black ink, appearing to read "Loretta Brown", written over a horizontal line.

Loretta Brown
Legal and Policy Analyst
loretta@salmonstate.org



May 3, 2023

Bill Tweit, Chairman
Ecosystem Committee
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Re: Comments regarding Programmatic EIS Draft Purpose and Need Statement and Scope and Framework for Alternatives

Dear Chairman Tweit and members of the Ecosystems Committee of NPFMC,

Please accept the following comments from SalmonState. SalmonState thanks this Committee for the opportunity to comment regarding the draft purpose and need statement and alternatives for a Programmatic EIS by the North Pacific Fishery Management Council (“NPFMC”) Ecosystem Committee. SalmonState has previously submitted comments to the NPFMC and this Committee encouraging a comprehensive National Environmental Policy Act (NEPA) review process. We are encouraged that this Committee recognizes the need for a comprehensive environmental review and has commenced a process to develop a preliminary description of a purpose and need statement and potential alternatives. SalmonState continues to urge this Committee and the Council to approach a NEPA review process with a goal of informing equitable, climate adaptive, and Ecosystem Based Fisheries Management (“EBFM”) in the North Pacific, that results in the necessary changes in decision-making of the federal fisheries.

SalmonState, an Alaska based conservation effort, works to protect salmon habitat, and promote policies that will guarantee Alaska remains the SalmonState; the home of the world's largest, healthiest and most abundant wild salmon resource, which provides culture, food, income, employment and recreation to Alaskans, Americans and the rest of the world. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

The purpose and need for the Programmatic Environmental Impact Statement (“PEIS”) should be constructed by this Committee to clarify that the PEIS analysis scope will include the status of the Bering Sea and Gulf of Alaska ecosystems and establish a new environmental baseline, the cumulative impacts of implementing federal fisheries management decisions on non-target marine living resources and habitat, coastal and inland communities, and Alaska Native people

and cultures. The purpose and need should further clarify that the PEIS is not simply an update of the outdated 2004 Programmatic Supplemental EIS and 2015 Supplemental Information Report, but a comprehensive NEPA analysis of the Bering Sea and Gulf of Alaska that will inform the EBFM regime for all federally managed fisheries. The 2004 PSEIS and 2015 SIR are narrow in analysis, goals, and outcomes. The single species standard analyzed in the 2004 PSEIS that continues to be the basis of management decisions by the Council and NMFS inherently burdens and devalues all fisheries and dependent communities outside of the federally managed groundfish fisheries. While EBFM was introduced in the 2004 PSEIS, the concept was in its infancy and not widely applied in fisheries management. The development of EBFM over the past two decades through NMFS nationally and in international waters by other countries has crystalized some of the best practices for an ecosystem approach to fisheries management. The PEIS should cover those updates and improvements to fisheries management and reflect the 2016 EBFM policy by NMFS and 2019 implementation plan by the Alaska Region. EBFM should also include the impacts and interactions of the people and communities of the region, including coastal and upriver communities that fish and depend on anadromous species intercepted in the ocean by federally managed fisheries.

Additionally, it is imperative that the PEIS include an evaluation of the cumulative impacts of climate change and federal fisheries management decisions on subsistence and cultural and traditional use resources. As evident in the past several years, the NPFMC decision-making process in managing the Bering Sea and Gulf of Alaska federal groundfish fisheries impacts Alaska Native peoples and communities. The closure of subsistence and direct target fisheries in Western Alaska have a direct and devastating effect on communities along the Yukon and Kuskokwim Rivers that depend upon those fish for income, food security, and the passing on of Alaska Native traditions and cultural practices. These communities have been underserved and underrepresented in federal fisheries management decisions and in the 2004 PSEIS and subsequent 2015 SIR. Furthermore, for an adequate review process and in pursuit of the Administration's Executive Orders regarding equity and Nation-to-Nation relations and NOAA's Equity and Environmental Justice strategy and policy, this Committee and the Council should make clear that Tribal representatives and Indigenous peoples are an integral part of development of this NEPA analysis and provide clarity that PEIS analysis will include Traditional Ecological Knowledge and a robust analysis of impacts to subsistence resources and Alaska Native communities.

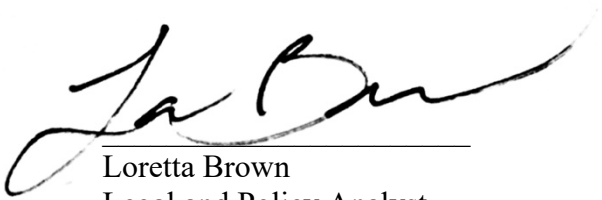
In development of a range of alternatives, this Committee and the Council should clarify that the outcomes of the NEPA process will include directives for real and immediate action to reduce impacts of implementing federal fisheries management on non-target bycatch species, coastal and inland communities, and Alaska Native culture and traditions. Each of the alternatives considered should include, at minimum, more management measures for a climate adaptive fisheries management, reduce impacts of federal fisheries on non-target living marine resources and habitat, incorporate EBFM and Equity and Environmental Justice criteria in establishing the optimum yield range of a target fishery, and include Alaska Native interests and knowledge in federal fisheries decisions.

As discussed above, this NEPA analysis process must include a more comprehensive review of the Bering Sea and Gulf of Alaska, as a simple update to the 2004 groundfish fisheries NEPA

analysis would have limited applicability and cannot fully inform fisheries management decisions and implement the Ecosystem Based Fisheries Management and Equity and Environmental Justice policies as directed by NOAA.

Finally, SalmonState encourages this Committee and the Council to adopt a purpose and need statement and a preliminary description of the range of alternatives within this meeting cycle to allow NMFS to commence the NEPA review process with scoping in a timely manner. We thank you for the opportunity to comment. Please contact Loretta Brown at loretta@salmonstate.org with any questions regarding these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Loretta Brown", written over a horizontal line.

Loretta Brown
Legal and Policy Analyst
SalmonState
loretta@salmonstate.org