



September 29, 2023

Bill Tweit,
Vice-Chair
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: E Staff Tasking - BSAI and GOA Federal Fisheries Programmatic EIS, Tribal Consultation Should be Early and Ongoing

Dear Chair Kinneen, Council Members, and Director Kurland,

SalmonState is an Alaska based and Alaska focused project working 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 fisheries.

I. The Council should prioritize the development of a Programmatic EIS for the Bering Sea, Aleutian Islands, and Gulf of Alaska

SalmonState appreciates the opportunity to submit comments to the North Pacific Fishery Management Council (“NPFMC”) regarding the recommendation and efforts by the Ecosystem Committee and to commence a Programmatic NEPA analysis for all federally managed fisheries of the Bering Sea Aleutian Islands and Gulf of Alaska. SalmonState, like many members of the public, has previously submitted comments to the NPFMC and the Ecosystem Committee encouraging a comprehensive National Environmental Policy Act (NEPA) review process. We continue to urge this Council to initiate a NEPA review process with a goal of achieving equitable, climate adaptive, precautionary, and ecosystem-based federal fishery management in the Bering Sea and Gulf of Alaska. Attached to this letter you will find the SalmonState letter submitted to the Ecosystem Committee with specific comments regarding the draft purpose and need statements and range of alternatives from the Ecosystems Committee and this Council in June.

In the past few years SalmonState has submitted numerous comment letters to the Ecosystem Committee and the NPFMC regarding the undertaking of a NEPA analysis for federal fisheries in the Bering Sea and Gulf of Alaska. SalmonState would like to reiterate for this Council that the 2004 PSEIS for the Bering Sea Aleutian Island and Gulf of Alaska Groundfish Fisheries is

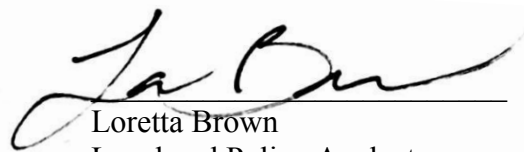
outdated. The North Pacific is at the forefront of climate change. The 2004 PSEIS is focused on maximizing economic gains of the trawl fleet, and not responsive to the impacts of the fishery on other fish, fisheries, communities, and ecosystem, and is no longer reliable to inform the sustainability of the fisheries of the Bering Sea and Gulf of Alaska. Failing to develop a comprehensive NEPA analysis for the Bering Sea and Gulf of Alaska's federally managed fisheries will perpetuate the inequity placed on Alaska Native people and coastal communities and continue to exacerbate the impacts of climate change on vulnerable marine species and the people that depend upon them.

II. This Council should incorporate recommendations from Alaska Native Tribes and Tribal entities in formal and informal meaningful consultation early and ongoing in the development and decision-making of fisheries management decisions.

Over the past several years, individuals, organizations, Tribal entities, and communities have come to this Council expressing deep concern over declining Chinook and chum salmon runs, the crash of some Bering Sea crab stocks, and a decrease in halibut abundance throughout the North Pacific Ocean. Western Alaska traditional and customary fishers, small boat direct fishery participants, and sport fishermen have all foregone multiple fishing seasons in response to this situation and repeated requests to this Council for immediate action have been summarily dismissed. Furthermore, under the current Council process, Alaska Native individuals and communities do not have the equal access to this Council, nor do they have adequate representation on the Council. Alaska Native entities and communities, small-boat fishermen, and sport and charter fishers do not have the same financial resources to participate in the Council meetings or send lobbyists on their behalf in the same manner as many of the industry interest groups. As such, we strongly encourage this Council to make the effort to engage with those Tribes, entities, and groups in a meaningful way when making management decisions. This Council should engage Alaska Native Tribes and Tribal entities early and often in informal and formal Tribal Consultation throughout Council decision making processes and in preparation for and development of NEPA analyses.

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 'La Brown', written over a horizontal line.

Loretta Brown
Legal and Policy Analyst
loretta@salmonstate.org