

WASHINGTON DEPARTMENT OF FISH AND WILDLIFE REPORT ON
CONSIDERATION OF 2015-2016 AND BEYOND HARVEST SPECIFICATIONS AND
MANAGEMENT MEASURES

As we mentioned at the March Council meeting, the Washington Department of Fish and Wildlife (WDFW) supports moving forward with having a revised schedule in place for the 2015-16 biennial groundfish specifications and management process, and with moving forward with Amendment 24 for the longer term. However, we also identified some concerns with Amendment 24 that we would like to reiterate and elaborate on.

Background

One of the key potential benefits of Amendment 24 is a programmatic approach to groundfish management that could save staff time and resources in future biennial management cycles. In order to successfully achieve this efficiency outcome, the Tier 1 Environmental Impact Statement (EIS) needs to include a thorough, broad defensible analysis of environmental—including ecological, biological, and economic—impacts, individually and cumulatively, over the long-term, which will take considerable effort to produce. Such effort should also produce NEPA analyses that are more useful for the Council’s conservation and management decisions and the public’s understanding and engagement in them.

In an effort to begin to reap the efficiency benefits sooner, Council staff has made it clear that they would like to complete the Tier 1 EIS in concert with the 2015-16 biennial process, which would have final Council approval scheduled for June 2014. Given the critical need for a comprehensive long-term environmental impacts analysis, WDFW questions whether this timeline will allow for an analysis that can be completed, read, and understood by the Council and deemed defensibly strong and sufficiently robust in its thoroughness to remain valid and useful over a number of cycles.

While considering the need for Amendment 24, the Council also finalized its Fishery Ecosystem Plan (FEP) and considered how to further incorporate ecosystem considerations into its management processes. The Council recognized the connections between the FEP and the Tier 1 EIS and, at the Council’s request, the Ecosystem Plan Development Team developed Initiative 9, which was provided to the Council in April. This initiative describes a proposed method to complete this critical analysis. To be robust, the Tier 1 EIS must incorporate many of the efforts the Council has heard discussed under its ecosystem related agenda items. And if, as planned, the EIS is to cover four biennial cycles following the approval of the amendment, then it should also be a tool to further the Council’s progress toward ecosystem based fisheries management.

In order for WDFW's delegation to have sufficient time to read, understand and digest the EIS for final approval in June, we believe that a near-final EIS would be needed by March. Backing up the schedule from there, in order for the Council staff who have been tasked with writing this draft EIS to meet that timeline, we think it is necessary for them to have assistance, primarily NOAA Fisheries Science Center staff who are conversant with the Integrated Ecosystem Assessment or other ecosystem models and ecological indicators of the California Current Ecosystem the Council has been considering.

In recognition of this, WDFW proposed, and the Council unanimously approved, a motion in March to revise its Amendment 24 Workgroup to include ecosystem experts from the Scientific and Statistical Committee (SSC) and the NOAA Fisheries Science Centers. However, later that week, the Council decided that, given Council workload and other activities, such as the Managing the Nation's Conference, this revised workgroup would not need to meet in the near-term (i.e., before the June meeting). In April, the Council also discussed how the Amendment 24 Workgroup may not be the best fit for this task given its charge.

Recommendation

WDFW continues to believe that the long-term environmental impacts analysis—its usefulness and strength— and would benefit from having additional scientific expertise and input into the design and production of the Tier 1 EIS. At the same time, we recognize there are costs associated with expanding the current Amendment 24 Workgroup in terms of travel expense and coordination time from staff. To that end, we propose expanding the “project team” to include ecosystem experts from the SSC and the NOAA Fisheries Science Centers and request that the SSC identify four or five individuals that they would recommend for this effort at this meeting.

The expanded “project team” would be charged with: providing an independent peer review of the current draft EIS and guidance on the overall approach relative to accounting for environmental impacts; discussing the available data and resources for the long-term impact analysis; and recommending revisions to the EIS outline and contents, as needed.

We also propose that this expanded “project team” hold two work sessions, which would be open to the public to attend and observe—one between the June and September Council meetings and another between September and January—and that they provide status reports in September and March. We understand that the timing of these work sessions may not be ideal, given this is an “on-year” for science and STAR panel reviews, but believe it is necessary in order to complete a near-final EIS by March.

We also request that the SSC review the draft EIS and provide their report to the Council in March relative to the usefulness and strength of the long-term environmental impacts analysis. More detailed questions for the SSC may be identified after we receive the initial report from the expanded “project team.”