

Joint Council Staff and National Marine Fisheries Service Report on Harvest Specifications and Management Measure Documentation

The Pacific Fishery Management Council (Council) and the National Marine Fisheries Service (NMFS) coordinate development of the biennial groundfish harvest specifications and management measure analyses and documentation suitable for National Environmental Policy Act (NEPA) requirements, other applicable laws, and decision-making. To achieve this requires interrelated documentation, including but not limited to, (1) quantitative and detailed analytics to inform Council recommendations, and (2) impacts analysis to satisfy NEPA requirements. This informational report serves to detail how NMFS and Council staff will document the process.

With regards to NEPA documentation, the Council is most familiar with NEPA documents like Environmental Impact Statements (EIS) or Environmental Assessments (EA). These document types are commonly used for groundfish actions the Council recommends to NMFS. In the past, Council and NMFS staff (hereinafter “project team”) have integrated the Council analytical documents (e.g., [Agenda Item G.6, Attachment 2, April 2020](#)) with the NEPA document to form one large record (e.g., [Agenda Item F.1, Attachment 8, June 2020](#)) that is submitted for final evaluation and approval by NMFS.

While this tactic has been successful in the past, it comes with a few drawbacks. The final NEPA document can easily exceed 300 pages when all the analyses are combined. Like all NEPA documents, the final version must go through multiple levels of review and clearance at NMFS to ensure it meets all legal requirements. The length and detail of this integrated document has the potential to inadvertently impact implementation timelines.

To reduce the review burden and potentially decrease clearance time for the NEPA document, the project team plans to modify how the NEPA document is approached. To that end, the project team is moving forward with a plan to separate analyses that were previously integrated. While no action is needed by the Council, the project team’s goal with this statement is to provide complete transparency of our process so the Council knows what to expect.

In general, the detailed analytics presented to the Council will not substantively change. The Council documents will continue to provide highly detailed analytical information, published in the briefing book, from which the Council can base its recommendations upon. The NEPA document (EA/EIS) will, however, be markedly shorter, drawing its information and conclusions from the Council analytical documents, incorporating them by reference. The information and conclusions will be presented in a largely qualitative fashion that may reduce necessity for new or updated NEPA analyses for some types of groundfish actions in the future.

In summary, the Council should expect familiar analytical documentation in briefing book materials that is detailed enough to inform the various specifics needed to weigh and formulate comprehensive recommendations.