

## Historical Performance of Gulf Council Scoping hearings

Staff is proposing the Council consider putting less emphasis on scoping hearings and more on holding Advisory Panel (AP) meetings for stakeholder input in the early stages of plan amendments. Please note that our AP and SSC meetings, as well as the Council meetings and associated public testimony, provide extensive opportunities for the public to provide information to the Council that NMFS can use to support their scoping process, and by extension, the NEPA requirements.

Each series of hearings takes staff approximately two weeks to complete and given the resources required for both scoping and public hearings, the scoping hearings may not be adequately fulfilling the Council's or NMFS' needs with regard to the NEPA scoping process requirements. Since 2011, the Council has held 48 scoping hearings for 6 amendments and 75 public hearings for 8 amendments. During the past 4.5 years, attendance at scoping hearings has been approximately one-third of the attendance at public hearings. In total, 635 people attended these scoping hearings and 1,493 people attended public hearings. Average attendance at scoping hearings was 13 attendees, whereas at public hearings it was 20 attendees. Also, the average median number of attendees at scoping hearings was 10, whereas the average median number of attendees at the public hearings was 19, almost twice as many. Interestingly, regardless of the type of hearing, about half of them were attended by 5 or less people.

The entire Council process, including AP and SSC meetings, public hearings, Council meetings and Council meeting testimony, together forms the largest part of the informal NEPA Scoping Process for NMFS. As it is the NMFS' responsibility, not the Council's, to fulfill scoping requirements, they publish a Notice of Intent in the Federal Register once they determine an Environmental Impact Statement (EIS) is needed. Not every action requires scoping as a scoping process is only required by NEPA when an EIS is anticipated, and is not a required part of an Environmental Assessment (EA) or Framework Amendment process. The majority of Council actions involve EAs, not EISs.

We think the relatively poor attendance at the scoping hearings may be due because they occur too early in the Council process to get the public's attention. Staff is suggesting we replace traditional scoping hearings with a series of online scoping workshops, in addition to the input we get from the appropriate AP(s) or SSC(s). We believe this combination of stakeholder input would provide the Council with a more in-depth review of options papers to help the Council identify issues and potential solutions at these early stages.

Staff also suggests we hold more AP meetings throughout the year. However, the time and effort required to conduct 3 to 4 series of hearings a year that we have been doing (including both scoping and public) are detracting from efforts that might more productively be spent in working with our APs.

No immediate Council action is necessary on this topic. Staff does request that for future amendments, the Council consider placing more emphasis on using our APs and online capabilities for stakeholder input and less on in-person scoping hearings.