

FINDING OF NO SIGNIFICANT IMPACT

Gear and Operational Requirements in Pelagic Longline Fisheries (RIN 0648-BK74)

April 11, 2022

The National Marine Fisheries Service (NMFS) will prohibit the use of wire leaders in the Hawaii deep-set longline fishery. In addition, NMFS will require fishermen, with limited exceptions, to remove fishing gear from any oceanic whitetip shark caught in longline fisheries operating under the Fishery Ecosystem Plan for Pelagic Fisheries of the Western Pacific (FEP); including the Hawaii deep-set and shallow-set longline fisheries and American Samoa longline fishery. The action is intended to increase post-hooking survival of threatened oceanic whitetip sharks.

I. Purpose of Finding of No Significant Impact (FONSI):

The National Environmental Policy Act (NEPA) requires the preparation of an Environmental Impact Statement (EIS) for any proposal for a major federal action significantly affecting the quality of the human environment (42 U.S.C. § 4332(C)). The Council on Environmental Quality (CEQ) Regulations direct agencies to prepare a Finding of No Significant Impact (FONSI) when an action not otherwise excluded will not have a significant impact on the human environment (40 CFR §§1500.4(b), 1500.5(b), and 1501.6). To evaluate whether a significant impact on the human environment is likely, the CEO regulations direct agencies to analyze the potentially affected environment and the degree of the effects of the proposed action (40 CFR § 1501.3(b)). In doing so, agencies should consider the geographic extent of the affected area (i.e., national, regional, or local), the resources located in the affected area (40 CFR § 1501.3(b)(1)), and whether the project is considered minor or small-scale (NAO 216-6A CM, Appendix A-2). In considering the degree of effect on these resources, agencies should examine, as appropriate, short- and long-term effects, beneficial and adverse effects, and effects on public health and safety, as well as effects that would violate laws for the protection of the environment (40 CFR § 1501.3(b)(2)(i)-(iv); NAO 216-6A CM Appendix A-2 - A-3), and the magnitude of the effect (e.g., negligible, minor, moderate, major). CEQ identifies specific criteria for consideration (40 CFR § 1501.3(b)(2)(i)-(iv)). Each criterion is discussed below with respect to the proposed action and considered individually as well as in combination with the others.

In preparing the FONSI, we consider the 2022 Final Environmental Assessment (EA) for Pelagic Longline Gear and Operational Requirements in Pacific Island Fisheries to Improve Survivorship of Oceanic Whitetip Sharks (NMFS and WPFMC 2022). This EA evaluated the affected area, the scale and geographic extent of the proposed action, and the degree of effects on those resources including the duration of impact, and whether the impacts were adverse and/or beneficial and their magnitude. The EA is hereby incorporated by reference per 40 CFR § 1501.6(b).



The EA, prepared using the 2020 CEQ NEPA regulations, analyzes the potential impacts on the human environment from prohibiting wire leaders in the Hawaii deep-set longline fishery and requiring fishermen to remove trailing gear from oceanic whitetip sharks in all longline fisheries operating under the FEP. NMFS published a proposed rule describing this action in the *Federal Register* on January 19, 2022 (87 FR 2742). We received comments from 46 individuals and 2 organizations all generally supporting the action. Comments included expanding the proposed rule to other fisheries, other species of sharks, and all bycatch species, as well as recommending additional gear and handing requirements to further reduce oceanic whitetip and other shark mortality. We considered public comments in finalizing the EA, in making a decision on the selected management action, and prior to finalizing this FONSI. The comments we received did not change the alternatives considered, the expected fishery outcomes, or the analysis of environmental or fishery effects in the draft EA. We respond to comments in detail in the final rule.

In the EA, the Council and NMFS considered the environmental effects of three management alternatives:

- Alternative 1. No action (status quo/current management).
- Alternative 2. Prohibit wire leaders in the Hawaii deep-set longline fishery and:
 - 2a Require removal of trailing gear from oceanic whitetip sharks in the Hawaii deep-set longline fishery only, or
 - 2b Require removal of trailing gear from oceanic whitetip sharks in all western Pacific pelagic longline fisheries operating under the FEP (preferred alternative).
- Alternative 3. Prohibit wire leaders and require removal of trailing gear from oceanic whitetip sharks in all western Pacific pelagic longline fisheries operating under the FEP.

Alternative 2b is the preferred alternative. Our analysis in the EA indicates that this alternative would, overall, have either negligible or minor short- and long-term impacts to the operation of the fishery or to target and non-target species, bycatch species, protected species, or on marine habitats relative to the baseline. This alternative is expected to result in an approximately 30% reduction in mortality of threatened oceanic whitetip sharks caught by Hawaii deep-set vessels in the short- and long-term, though this is considered a minor improvement relative to the baseline. While 30% may seem like more than a minor improvement, we classed the effect as minor given the number of oceanic whitetip sharks caught in the fishery. NMFS will continue to regulate and monitor the fishery to ensure sustainability and the effects of the action on survival rates of oceanic whitetip sharks.

II. Approach to Analysis:

The analysis in the EA evaluates the potential effects of prohibiting wire leaders in the Hawaii deep-set longline fishery and requiring fishermen, with limited exceptions, to remove fishing gear from any oceanic whitetip shark caught in longline fisheries operating under the FEP. The EA considered the geographic setting and scope of the proposed action and its effects relative to the baseline. We considered short- and long-term effects, beneficial and adverse effects, and the potential for additive or synergistic effects. Our analysis evaluated the proposed gear and

handling requirements on target and non-target stocks (EA, section 4.1), other marine resources affected by the fishery (EA, section 4.2), and considered any effects of the management action on fishery participants, affected fishing communities, and management agencies (EA, section 4.3–4.5) as summarized below.

The scale of the proposed action is determined to be minor and, therefore, not considered to meaningfully contribute to a significant impact to specific resources. The proposed action would not result in major beneficial or adverse effects on non-target or bycatch species, protected species, marine habitats, or other marine resources. Given the characteristics of the fishing fleet, the proposed action would not result in impacts to air quality, noise, water quality, view planes, or terrestrial resources. The proposed action is connected to other actions associated with management of these fisheries under the FEP (EA, section 4.6), but there is no indication that the effects of the proposed action would add to the effects of other projects such that the effects taken together would be significant. The Western Pacific Fisheries Management Council (Council) and NMFS, through the FEP, manage longline fisheries to meet established domestic and international conservation and management objectives. International conservation and management measures for these fisheries are developed by the Western and Central Pacific Fisheries Commission (WCPFC) and Inter-American Tropical Tuna Commission (IATTC), to which the United States is a party.

III. Geographic Extent and Scale of the Proposed Action:

The EA describes the management area where the subject fishery is authorized and thus the area where environmental effects are analyzed. Specifically, the EA describes that the action area geographically as all areas where longline fishing vessels operate under the FEP and includes portions of the U.S. exclusive economic zone (EEZ) around Hawaii, American Samoa, Guam, the Commonwealth of the Northern Mariana Islands (CNMI), and the Pacific Remote Island Areas (PRIA) that are open to commercial fishing and large longline vessels, and the adjacent high seas. The EA notes that there are currently no active longline vessels operating in the U.S. EEZ around Guam or CNMI under the Western Pacific general longline permit. The action is regional in its geographic extent as it includes the EEZ and international waters adjacent to Hawaii and American Samoa in the North and South Pacific Oceans (EA section 1.4). We conclude that the scale of effects is minor because the management action would, at most, have only minor impacts on fishing operations and these fisheries continue to fish sustainably.

IV. Degree of effect

A. The potential for the proposed action to threaten a violation of Federal, state, or local law, or requirements imposed for environmental protection.

This proposed action will not threaten a violation of any Federal, state, or local law, or requirement imposed for the protection of the environment. The proposed action of prohibiting wire leaders in the Hawaii deep-set longline fishery and handling requirements for oceanic whitetip sharks in all FEP longline fisheries (Alternative 2b) is consistent with the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) and other applicable laws including those imposed for environmental protection. The proposed action is

also consistent with international conservation and management measures defined by the WCPFC or IATTC. Council deliberations took place in public forums with opportunities for public comments during development of its recommendations. NMFS and Council staff developed the EA and coordinated with government natural resource agencies of Hawaii and American Samoa and the public. NMFS provided opportunities for the public to review and comment on the EA with publication of the proposed rule (85 FR 73029; November 16, 2020) and did not receive any comments indicating that the proposed action has the potential to violate an international, Federal, state, or local law imposed for environmental protection (EA, section 1.8).

B. The degree to which the proposed action is expected to significantly affect public health or safety?

Fishermen have used wire leaders in the Hawaii deep-set fishery to reduce the risk of crew injuries resulting from "fly back." Fly backs can occur when retrieving fishing gear (hauling) if the line under tension between the hook and the weighted swivel breaks, is bitten off by sharks, or the hook is thrown from a fish and the weighted swivel flies back toward the vessel at high speed. The use of wire leaders between the hook and the weight reduced the chance that the leader will break or be bitten-off, thereby minimizing fly backs. To address the potential increased risk of fly back associated with using monofilament leaders instead of wire leaders, the Council, NMFS, and Hawaii Longline Association (HLA) are working with Hawaii deep-set longline fishermen to ensure best safety practices, including offering training on construction and use of a reusable fly back prevention device from materials readily available on longline vessels (EA, section 4.5.1). These safety training efforts are expected to reduce safety risks to fishermen of the proposed action to negligible over the short- and long-term.

The longline fisheries operating under the FEP are not known to experience or cause other public health or safety-at-sea issues. The proposed rule would not change the operation of the fishery in ways that would create new health or safety issues. Therefore, there is no potential for other significant adverse effects to public health or safety (EA, section 4.5).

C. The degree to which the proposed action is expected to affect a sensitive biological resource including Federal threatened or endangered species and critical habitat

The proposed action will have negligible effects on endangered or threatened species and critical habitat in the short and long term with the exception of oceanic whitetip sharks. We expect a minor improvement to the post-hooking survival rates of threatened oceanic whitetip sharks that interact with longline fishing gear relative to baseline as a result of this action. Section 3.2 of the EA describes the endangered and threatened species potentially affected by the proposed action. The EA describes previous Biological Opinions under which longline fisheries have operated at the time the EA was prepared. Section 3.2.1 of the EA describes reinitiation of Endangered Species Act (ESA) section 7 consultations for the Hawaii deep-set longline fishery and the American Samoa longline fishery (summarized below). The information in the EA indicated that these fisheries are not likely having a significant effect on the overall population size of any protected species, are not likely to reduce appreciably the likelihood of both survival and

recovery of any species in the wild, and do not cause an adverse modification of critical habitat. Under the proposed action, NMFS does not anticipate a change in gear types used beyond the prohibition of wire leaders in the Hawaii deep-set longline fishery, areas fished, level of interaction with ESA-listed species or critical habitat, as compared to baseline conditions. Therefore, the action will not have effects on endangered or threatened species, seabirds, or critical habitat that have not been previously considered or authorized in ESA consultations or Marine Mammal Protection Act (MMPA) determinations (EA, sections 4.3.2, 4.3.3), besides the minor improvement expected for oceanic whitetip shark survival rates in the short- and long-term relative to baseline.

The Hawaii longline fisheries operate under a False Killer Whale Take Reduction Plan (Plan) implemented on December 31, 2012, pursuant to section 118(f) of the Marine Mammal Protection Act (MMPA) to reduce the level of incidental mortality and serious injury to the Hawaii pelagic and Hawaii insular stocks of false killer whales (77 FR 71260; November 29, 2012). One measure in the Plan utilizes so called "weak hooks" designed to straighten and free hooked false killer whales. Plan regulations at 50 CFR 299.37 include specifications for leaders meant to ensure hooks can straighten prior to the leader breaking. This action to prohibit wire leaders is not expected to alter effectiveness of the weak hook or other measures under the Plan.

On October 4, 2018, NMFS Pacific Islands Regional Office (PIRO) requested reinitiation of formal consultation under section 7 of the ESA for the Hawaii deep-set longline fishery in response to exceeding the ITS for east Pacific green sea turtle, the listing of the oceanic whitetip shark and giant manta ray as threatened, and the designation of critical habitat for the main Hawaiian Islands (MHI) distinct population segment of the insular false killer whale. On October 4, 2018, April 15, 2020, December 18, 2020, and November 17, 2021, NMFS determined that the continued operation of the fishery during the period of consultation will not violate ESA Sections 7(a)(2) and 7(d) (EA, section 3.2.1).

On April 3, 2019 PIRO requested reinitiation of ESA section 7 consultation for the American Samoa longline fishery based on several reinitiation triggers. The fishery exceeded the ITS for the east Indian West Pacific, Southwest Pacific, Central South Pacific, and East Pacific green sea turtle DPS; hawksbill; and olive ridley sea turtles in 2018. Listing of the oceanic whitetip shark, giant manta ray, and chambered nautilus as threatened species also triggered the requirement for reinitiated consultation. On April 3, 2019, May 6, 2020, and July 13, 2021, NMFS determined that the continued authorization of the fishery during the period of consultation will not violate ESA Sections 7(a)(2) and 7(d) (EA, section 3.2.1).

On April 15, 2021 NMFS announced a positive 90-day finding on a petition to list the shortfin mako shark (*Isurus oxyrinchus*) as threatened or endangered under the ESA and to designate critical habitat concurrent with the listing, so NMFS is initiating a status review of the species to determine whether listing under the ESA is warranted. If the short fin mako shark is listed, NMFS would consult as required under ESA section 7 to determine the effects of these fisheries on this species.

In summary, based on the analysis in the EA, the proposed action is not expected to change the fishery in a way that would result in new or additional effects to listed species beyond those that already occur, except for a minor improvement in oceanic whitetip shark post-hooking survival rates over the short and long term relative to the baseline.

1. The degree to which the proposed action is expected to affect a sensitive biological resource including stocks of marine mammals as defined by the Marine Mammal Protection Act

Sections 3.2.2 and 4.2 in the EA describe the potential for the fisheries to affect marine mammals. The Hawaii deep-set longline fishery is classified as a Category I fishery under the 2021 List of Fisheries (LOF), and the American Samoa longline and Hawaii shallow-set longline fisheries are classified as Category II fisheries. The proposed 2022 LOF (86 FR 43491, August 9, 2021) maintained these classifications, changed the Hawaii shallow-set longline fishery participation from 13 to 11 vessels/persons, and did not change the Hawaii deep-set and American Samoa participation levels. A Category I fishery is one with frequent serious injuries and mortalities incidental to commercial fishing, and a Category II fishery is one with occasional serious injuries and mortalities. Among other requirements, owners of vessels or gear engaging in a Category I fishery are required under 50 CFR § 229.4 to obtain a marine mammal authorization to lawfully take incidentally marine mammals by registering with the NMFS marine mammal authorization program. Under the proposed action, fishery operations are not expected to differ substantially from the baseline. The proposed action would not modify vessel operations or other aspects of the fishery that would be expected to alter effects on marine mammals. NMFS does not expect the fisheries to affect marine mammals in any manner not previously considered under the List of Fisheries classifications or authorized under the commercial fishing take exemption of Marine Mammal Protection Act section 118 (EA, sections 3.2.2 and 4.2).

2. The degree to which the proposed action is expected to affect a sensitive biological resource including essential fish habitat identified under the Magnuson-Stevens Act

This proposed action would have no effect on essential fish habitat (EFH) or habitat areas of particular concern (HAPC) identified under the Magnuson-Stevens Act. Sections 3.2.9 and 4.2.4 of the EA describe that FEP longline fisheries are not known to cause substantial damage to the ocean, coastal habitats, corals, or marine habitats, including designated EFH and HAPC for any management unit species. The analysis explains that the proposed action would not change the fishery in any way that would lead to substantial alterations to marine habitats relative to the baseline. Under the proposed action, the fishery would operate at the same average level as the baseline alternative. NMFS does not expect the proposed action to change areas fished or fishing methods as compared to baseline conditions (EA, Section 4.2.2). For these reasons, the proposed action is expected have a negligible effect on areas designated as EFH or HAPC.

3. The degree to which the proposed action is expected to affect a sensitive biological resource including bird species protected under the Migratory Bird Treaty Act

The proposed action would have negligible effects on bird species protected by the Migratory Bird Treaty Act relative to the baseline. Seabirds are vulnerable to fisheries through hooking and entanglement, which may result in injury or mortality; however, seabird interactions are relatively rare in the Hawaii deep-set longline fishery. NMFS previously implemented mitigation measures in these fisheries to limit seabird interactions, including night-setting, weighted branch lines, and seabird handling and release techniques, which collectively resulted in a reduction in total seabird interactions in Hawaii shallow- and deep-set fisheries by over 90% by 2006 (EA, section 3.2.7). NMFS does not expect the proposed action to change areas fished, or fishing methods as compared to baseline conditions, and the prohibition of metal wire leaders is not expected to modify seabird interaction rates. For these reasons, the fishery conducted under the proposed alternative would have no effect on seabirds relative to the baseline.

4. The degree to which the proposed action is expected to affect a sensitive biological resource including national marine sanctuaries or monuments;

The action area for the proposed action does not overlap with any marine sanctuaries or monuments, and thus would not affect marine sanctuaries or resources (EA, sections 4.2.4).

5. The degree to which the proposed action is expected to affect a sensitive biological resource including vulnerable marine or coastal ecosystems, including, but not limited to, shallow or deep coral ecosystems;

The proposed action is expected to have no effect on shallow or deep coral ecosystems or other sensitive biological resources. As described in EA section 3.2.9, the fishery is not currently adversely affecting vulnerable ecosystems. The proposed action is not expected to change the way this fishery is conducted, and it would not change regulations that are in place to prevent and minimize adverse effects from longline fisheries. For example, longline fisheries are not permitted in sensitive marine ecosystems around Hawaii, Guam, Commonwealth of Northern Mariana Islands, American Samoa, or in the North West Hawaiian Islands (50 CFR § 665.806). For this reason, the proposed action is not expected to lead to adverse effects to ocean, coral or coastal habitats; or unique areas such as marine protected areas, marine sanctuaries or marine monuments (EA, section 4.2.4).

6. The degree to which the proposed action is expected to affect a sensitive biological resource including biodiversity or ecosystem functioning (e.g., benthic productivity, predator-prey relationships, etc.)

The proposed action is not expected to adversely affect biodiversity or ecosystem functioning relative to baseline. There have been no identified impacts to marine biodiversity and/or ecosystem function from FEP longline fisheries (EA, section 4.5.2). Because the proposed action would not substantially modify vessel operations or other aspects of these fisheries, NMFS does not anticipate the proposed action would result in changes in gear types used beyond the use of wire leaders, areas fished, or fishing methods, as compared to baseline conditions. Since the

proposed action would not change key attributes of the fishery, NMFS expects no effects on biodiversity or ecosystem function relative to baseline from the proposed action.

D. The degree to which the proposed action is reasonably expected to affect a cultural resource: properties listed or eligible for listing on the National Register of Historic Places; archeological resources (including underwater resources); and resources important to traditional cultural and religious tribal practice.

The proposed action would not adversely affect cultural or archeological resources or resources important to traditional cultural and religious tribal practice. NMFS is not aware of any districts, sites, structures, or objects listed in or eligible for listing in the National Register of Historic Places within areas fished by FEP longline fisheries, and longline fisheries are not known to result in adverse impacts to scientific, historic, archeological or cultural sites (EA, section 4.5.2). The proposed rule would not change FEP longline fisheries in any manner that would result in effects to such sites; therefore, there is no potential for loss or destruction of significant scientific, cultural, or historical resources in the marine environment.

E. The degree to which the proposed action has the potential to have a disproportionately high and adverse effect on the health or the environment of minority or low-income communities, compared to the impacts on other communities (EO 12898).

The proposed action would not have disproportionately high and adverse effects on the health or the environment of minority or low-income communities, compared to the impacts on other communities. The FEP longline fisheries are not known to have a large adverse environmental effect on stocks of fish that may be caught by subsistence fisherman, or on other marine resources that may be targeted for subsistence consumption (EA, section 4.3) These fisheries are sustainably managed and do not pollute marine waters, and so do not have adverse effects to human health or on marine life. NMFS and the Council manage these fisheries through the FEP and Federal regulations that are intended to conserve marine resources and habitats to enhance the economic and social well-being of fishing communities, including members of minority populations and low-income populations. The proposed rule would not change the fishery in any manner that would result in changes with respect to impacts on these populations. As a result, there would not be a disproportionately high and adverse impact to minority or low-income populations with respect to the availability of fish, other environmental effects, or health effects if NMFS implements the proposed action.

F. The degree to which the proposed action is likely to result in effects that contribute to the introduction, continued existence, or spread of noxious weeds or nonnative invasive species known to occur in the area or actions that may promote the introduction, growth, or expansion of the range of the species.

The proposed action would not have the potential to import, introduce, or contribute to the spread of noxious weeds or nonnative invasive species. The fishery is not known to be introducing or spreading non-indigenous species (EA, section 4.5.3) and the proposed action would not change fishing activities in any way that would result in the potential for non-indigenous species to be introduced or spread. NMFS does not anticipate the proposed action

would result in changes in gear types used, areas fished, or fishing methods, as compared to baseline conditions. Thus, the proposed action would not result in the introduction or spread of a non-indigenous species.

G. The potential for the proposed action to cause an effect to any other physical or biological resources where the impact is considered substantial in magnitude (e.g., irreversible loss of coastal resources such as marshland or seagrass), or over which there is substantial uncertainty or scientific disagreement.

The proposed action is not expected to cause an effect to any other biological or physical resource where the impact is considered substantial in magnitude or over which there is substantial uncertainty or scientific disagreement. The fishery is not known to be causing substantial environmental effects to resources (see section C, above). This fishery is managed both domestically and internationally to ensure sustainability and reduce potential effects on marine resources. The proposed action would not change the conduct of the fishery in a way that would have a substantial effect on resources (see section C, above). Finally, the effects of the proposed action, as analyzed in the EA, are not controversial. The Council's Scientific and Statistical Committee reviewed the scientific basis for the alternatives considered in this action. Scientists at the Pacific Island Fisheries Science Center developed and published analyses that supported the anticipated benefits of the action to oceanic whitetip sharks. Both NMFS and the Council provided opportunities for members of the public and fishery scientists and resource managers to review and comment on the environmental effects analysis. NMFS did not receive comments indicating substantial uncertainty in our effects analysis or that there may be scientific disagreement. The anticipated outcomes of the proposed action are not highly uncertain or controversial, and are supported by fishermen, other fishery stakeholders, and the public, as indicated by comments from 46 individuals and 2 organizations generally supporting and no comments opposing the proposed rule (EA, Section 1.8).

V. Other Actions Including Connected Actions

There are past, ongoing, and potential future actions that affect FEP longline fisheries that have the potential to interact with the proposed action. The EA (section 4.6) divided these actions into those that related to target and non-target stocks, protected resources, and socio-economic setting. The analysis in the EA found that no past, present, or reasonably foreseeable actions in any of these three categories combine or interact with the effects from the proposed action to result in cumulatively significant impacts (EA, section 4.6).

VI. Mitigation and Monitoring

Regulations for longline fisheries operating under the FEP include mitigation measures to prevent significant effects. As described in EA section 3.4, NMFS and the Council will continue to monitor these longline fisheries through required logbooks, vessel monitoring systems, observer reports, and other requirements consistent with 50 CFR § 665. The number of interactions with oceanic whitetip sharks will be recorded in logbooks and by observers when present. Observers will also provide estimates of the amount of trailing gear remaining on oceanic whitetip sharks when released.

The proposed action was developed to be consistent with the conservation and management objectives of the FEP, the Magnuson-Stevens Act, and other applicable laws, including international requirements. NMFS does not anticipate adverse effects from the proposed action on any aspect of the human environment, and expects minor improvements in post-hooking survival rates of oceanic whitetip sharks that interact with longline gear and potentially minor reduction in adverse effects on other protected species where the use of monofilament leaders will ease release by fishermen.

DETERMINATION

The CEQ NEPA regulations, 40 CFR § 1501.6, direct an agency to prepare a FONSI when the agency, based on the EA for the proposed action, determines not to prepare an EIS because the action will not have significant effects. In view of the information presented in this document and the analysis contained in the supporting EA, it is hereby determined that the proposed action will not significantly impact the quality of the human environment. The EA is hereby incorporated by reference. In addition, all beneficial and adverse impacts of the proposed action as well as mitigation measures have been evaluated to reach the conclusion of no significant impacts. Accordingly, preparation of an EIS for this action is not necessary.

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Date

April 11, 2022

Regional Administrator, Pacific Islands Regional Office

References

NMFS and WPFMC. 2022. Pelagic Longline Gear and Operational Requirements in Pacific Island Fisheries to Improve Survivorship of Oceanic Whitetip Sharks, Final Environmental Assessment Including a Regulatory Impact Review (RIN 0648-BK90). April 11, 2022.

Attachment: 2022 EA