

Inflation Reduction Act Funding for Climate Resiliency Planning: Workplan

December 1, 2023

As described in the [staff paper](#) presented at the October 2023 Council meeting, the Regional Fishery Management Councils have an unprecedented opportunity to invest in climate resiliency with support from the Inflation Reduction Act (IRA). NOAA Fisheries has dedicated \$20 million to the Councils for fishery management and governance actions in support of the following objectives:

1. Implementation of fishery management measures necessary to advance climate ready fisheries by improving climate resiliency and responsiveness to climate impacts; and
2. Development and advancement of climate related fisheries management planning and implementation efforts in support of underserved communities¹.

In October 2023, the Council indicated its interest in supporting a NPFMC proposal for IRA-funded activities and deliverables along the lines of a staff [conceptual approach](#) presented during the meeting. We are planning to submit a proposal in two parts, totaling \$2.5 million, that will fund a temporary staff position for the duration of the grant (2024-2027), and analytical work and workshops in support of Council projects that evaluate the Council's climate readiness and implement pathways and tools to better adapt to uncertainty.

The Council's interest in October was to use the funding to accelerate or expand upon existing Council climate-related priorities and initiatives. The Council focused on existing initiatives in recognition that despite the injection of additional funding, preparation and review of IRA projects will still affect the staff and Council capacity available for the Council's ongoing workload and priorities. Staff have developed a proposal for two projects. First, the funding would support completing the programmatic evaluation of the Council management policy and objectives, including potential adjustments to be adaptive to climate-driven marine ecosystem changes and include new knowledge pathways and management tools, through a Programmatic Environmental Impact Statement (PEIS) as [initiated](#) by the Council in June 2023. Second, the funding would support initiating tactical work on the science and management recommendations relating to assessment and climate science identified in the SSC's [report](#) on the February 2023 workshop on rapid environmental change. The Council also emphasized continuing to provide opportunities for Tribal entities and stakeholders to contribute to the development of the PEIS and climate-related initiatives. As a result, we have included funding for several workshops in support of IRA-funded projects, as a means to allow a more informal and open dialogue among Council, SSC, and AP members and stakeholders and Tribal entities as these projects develop.

In October, the Council tasked staff to bring back a workplan for the IRA funding proposal, highlighting the scope and timeline for what might be accomplished with IRA funds, including the PEIS, if the Council is successful in its proposals. We have developed a timeline and milestones for activities that we can accomplish using the grant funding, should we be successful (Table 1). The sections that follow the table describe each of the proposal elements in more detail.

At this December meeting, staff are looking for Council feedback on whether this is the right approach for use of the IRA funding opportunity, as we will be submitting proposals before the February 2024 Council meeting. Additionally, for tasking purposes, we would assume that the Council endorses continuing to plan for IRA projects to proceed along the timeline provided unless we receive

¹ In the North Pacific, many fishing communities that are substantially dependent on or engaged in the harvest and processing of fishery resources may also be underserved communities (see definitions in the [NOAA Equity and Environmental Justice Strategy](#), p.5). This paper considers support for "fishing communities" as opposed to "underserved communities" in line with National Standard 8 guidelines, and in recognition that communities are complex socioeconomic and cultural groups that may or may not identify themselves as underserved.

feedback to the contrary, although of course the Council will continue to adjust tasking priorities for all projects, including those supported by IRA funding, at each meeting during staff tasking.

Table 1 Draft timeline and milestones for use of IRA funding (if proposals are successful)

Council meetings	Dedicated staff position	Management policy amendments through a Programmatic EIS	Assessment and climate science amendments	
Feb		Council input on structure and alternatives for PEIS, questions for workshop	SSC identifies dynamic reference point or other case studies for SCS8	
Apr			SSC scopes contract work needed for sablefish MEY case study	
Jun		2024	CCTF Climate Scenario Planning Council Workshop	
(summer)			July: Issue Notice of Intent to Prepare a Programmatic EIS	August: SCS 8 national workshop
Oct			Review scoping comments, CCTF report and refine alternatives	Discussion paper on potential directions, initiate analysis of climate resilient tools (e.g. reference points, harvest control rules)
Dec				
(Feb)			PEIS Council Workshop	SSC Workshop on key components
Apr			Draft PEIS	
Jun				
Oct			Initial review draft	
Dec			Final PEIS; adopt revised management policy and objectives	
(Feb)		2026	PEIS Implementation Council Workshop	
Apr			Initiate actions for next steps	
Jun				Final action
Oct			Initial review(s)	
Dec				
				Final action(s)
2027				

Staff position – Climate Project Manager

The Council is including financial support for a staff position in the IRA funding proposal. The intent is for the staff person to perform the following duties:

- Serve as overall lead for the Council on the suite of Council activities funded under the IRA grant. Strategic planning on the implementation of the IRA workplan, and how to meet goals and track progress. Working with other Council analysts, ensure individual projects continue to align with the proposal objectives and timelines.
- Facilitate workshops that bring scientists, policy makers, and user groups together to discuss and develop policy changes in support of climate adaptation.
- Develop communication tools on the Council’s current state of climate readiness, the Council’s goals for projects supported by IRA funding, and regular progress reports and achievements. Act as the central point of contact for the Council and stakeholders on IRA-funded activities.
- Work with Council staff, agency partners, and contractors to prepare and contribute to a variety of reports, discussion papers, and as appropriate, regulatory impact analyses and environmental impact analyses, to assist the Council in developing fisheries policy and amending fishery management plans.

The staff person will also provide support for the Council and Council committees in matters relating to the climate readiness IRA funding initiative.

IRA Project – Management policy amendments through a programmatic evaluation

A primary project under the IRA funding proposal would be to develop an operational, adaptive climate-resilient management policy for all active federal fisheries managed under the Council’s jurisdiction, using the vehicle of the PEIS that the Council initiated in June 2023. The action alternative that the Council identified for this evaluation is to “adopt a more adaptive ecosystem-based management policy and objectives for Council managed fisheries which would enable the Council to develop and implement climate-resiliency tools; new pathways to incorporate indigenous, local, and traditional knowledge; and new tools to assess and adapt to risk in the face of additional uncertainty in stock status and distribution due to climate driven marine ecosystem changes.”

The process of developing the programmatic evaluation is an opportunity for the Council to articulate a strategic policy vision for what is climate resilient management in the North Pacific federal fisheries, which would drive operational changes (analytical and decision tools, management measures, Council process changes) as needed to bring the management framework in line with this policy. The programmatic evaluation process explicitly links and extends across all Council fisheries the work-to-date on climate readiness, ecosystem-based management, and integration of diverse knowledge sources.

The programmatic evaluation is broad and high-level in scope, and the Council has the potential to focus it in a number of ways as different approaches to policies, knowledge pathways, and management tools are considered. The programmatic evaluation will build on existing work such as the Bering Sea Fishery Ecosystem Plan Climate Change Taskforce (CCTF)’s Climate Readiness Synthesis, by taking a comprehensive look at Council management tools to better understand their current flexibility and limitations, how they interact, and think about how to build approaches that are specifically designed to work well under climate change. Themes from the Council’s recent discussions related to building climate readiness were highlighted in the October 2023 staff paper and are summarized in Attachment 1, however, more direction is still needed from the Council regarding how to structure the programmatic evaluation to best meet the Council’s intent. Some specific ideas that have been raised at the SSC and Council that could be folded into the programmatic evaluation include how to modify the management process to better react to abrupt rather than gradual changes; how to frame and communicate the Council’s risk tolerance and exploration of risk-based tools, both for stock considerations but also for

fishing business and community outcomes; how to define community resilience; how to define precautionary management; how to integrate climate science outputs (such as ACLIM and GOACLIM) in decisionmaking; how to consider equity and environmental justice in management; and how to recognize the reliance of Alaska tribes and communities on subsistence resources affected by Council fisheries.

Staff are also proposing to use the Climate Scenario Planning Workshop that is being scoped by the Council's CCTF as an opportunity to hone in on key topics and concerns that can be further evaluated in the programmatic evaluation. The goal of the workshop is to think broadly about incremental and transformational solutions and tools available within and beyond the current management process, which could be effective to address large climate impacts and changes. Using "what if" scenarios, especially related to climate-related disruptions that the Council has already experienced, provide an opportunity to learn from past experience as well as explore and test hypothetical future scenarios. Linking the workshop to the implementation vehicle of the programmatic evaluation of the Council's management policy provides a direct avenue to put these discussions into effect. The workshop format, with interactive breakout sessions and facilitated discussion, also provides a different point of access for a range of stakeholders and Tribal participants to the development of the programmatic evaluation. Discussing resilience and adaptive capacity with the Council community could help build a shared understanding of how and why people might respond to change, and how these responses might impact the effectiveness of management measures.

The Council has identified a Programmatic EIS as the vehicle for this strategic evaluation, and thus the Council must comply with the recent changes to NEPA which include a two-year timeframe from the issuance of the Notice of Intent to the final Secretarial Record of Decision on the selected alternative. As illustrated in Table 1, staff proposes bringing the programmatic evaluation as an agenda item to the Council in February 2024 to get further input from the Council on initial scoping questions, and the climate scenario planning workshop in the summer will also provide direction. Based on that input, NMFS would issue a Notice of Intent for the Programmatic EIS over the summer, so that in October 2024 the Council could review scoping comments and the workshop report for any final refinement of PEIS alternatives before staff prepare the analysis for review in 2025.

In the funding proposal, we intend to request funding for two further Council workshops on the programmatic evaluation. The workshop in 2025 would provide an opportunity for further discussion around a particular issue that the Council identifies as relevant – for example, an opportunity to invite community members to discuss how the Council might define community resilience. In 2026, the intent would be to use a workshop format to discuss next steps following Council adoption of a revised management policy, and in what areas to prioritize further changes to the management framework in order to align with the Council's objectives. With respect to timing, the 2024 climate scenario planning workshop is being proposed by staff to occur during the June Council meeting, in order to take advantage of the fact that Council, SSC, and AP members are already gathered as are many members of the public. For 2025 and 2026, staff have tentatively considered holding the workshop during the week that the February Council meeting would usually occur, assuming that the Council continues with its intent to forego the February Council meeting as possible. The IRA funding proposal, if successful, would support Council, SSC, and AP attendance at a standalone meeting in those years.

The Council staff lead for the PEIS is Sara Cleaver. Other Council analysts will also need to contribute to the analysis, including the new Climate Project Manager, and some additional contract help may also be required. The Climate Project Manager will facilitate workshops in support of the programmatic evaluation. While the new staff hire and contract help will contribute additional capacity, the Council should anticipate that completing the PEIS will impact other actions on the Council's workload.

IRA Project – Assessment and climate science amendments

The second major project to be funded under the IRA grant would be a corollary to the strategic programmatic policy evaluation. Its purpose would be an in-depth analysis of how to use assessment and climate science to increase adaptive management capacity, using recommendations from the SSC's February 2023 workshop report. The Council [supported](#) exploration of the following questions:

- Are dynamic reference points an alternative to current management practices reasonable, given the current Council processes under the Magnuson Stevens Act? This includes consideration of when to change the time periods over which reference points are calculated for crab and groundfish stocks.
- Could/should we incorporate social or economic objectives (e.g., maximum economic yield, biomass thresholds) into adaptive management approaches for some stocks?
- As stocks expand and shift, are regional allocations of catches in the EBS and NBS appropriate and could they be dynamic enough to address temporal variability?
- Can risk considerations be improved upon in the context of both stock assessments (ABC considerations) and management (TAC considerations)?

The IRA funding provides an opportunity to contract for analytical support and a workshop to further develop one or more of the ideas that have been identified. Additional examples to consider from the [October 2023 SSC report](#) include review and revision of the Tier system, review and revision to harvest control rules, consideration of dynamic reference points, how to make the TAC setting process more flexible, metrics needed to modify (add or delete) FMP species as species distributions and abundances continue to change.

The SSC also intends to capitalize on the August 2024 national meeting of the Scientific Coordination Subcommittee of the Council Coordination Committee (SCS8) to assist with NPFMC discussions. The SCS8 workshop will explore strategies for how to adapt ABC control rules given the highly variable and changing dynamics of climate, recruitment, and productivity, and use of alternative reference points and indicators in the absence of analytical assessments. The workshop will also address how SSCs can better use their expertise in the social sciences to provide critical insight on the potential for control rules to achieve management goals, and how fisheries and communities can adapt to dynamic conditions. The SSC intends to identify NPFMC case studies to bring to SCS8 that dovetail with the Council's interests in exploring assessment and climate science questions in our region (to be identified in February and April 2024), and through the IRA funding (if successful), the Council may be able to send additional NPFMC participants to benefit from the national discussion.

The Council staff lead for the assessment and climate science amendments is Dr. Diana Stram, and other Council staff will also contribute to the analysis. The Council will also work closely with the Alaska Fisheries Science Center and Council Plan Teams in the development of this analysis and any resulting amendments. As identified in Table 1, following SCS8, the SSC and Council will review a discussion paper that will allow them to prioritize and set a roadmap for how to move forward with exploring changes that may be relevant for the NPFMC process. Depending on the work needed to fully evaluate any concepts that the Council initiates, and the availability of contract and AFSC staff to assist, it is possible that the timeline identified in Table 1 may need to be adjusted. It will be important to ensure that timing of work on the assessment and climate science amendments is coordinated with the development of the PEIS, so that the strategic policy that the Council adopts through the PEIS is consistent with the tactical changes that are evaluated in these amendments.

ATTACHMENT 1 Synthesis of themes related to building climate resiliency

The Council has been considering needs related to climate-resilient fisheries through several recent initiatives. In order to help the Council consider what objectives, issue areas, or projects might be included in a NPFMC proposal for IRA funding, in October 2023, staff reviewed recent documents and prepared a synthesis of common themes. Documents that were reviewed include the Climate Readiness Synthesis prepared by the Council’s Climate Change Taskforce, the report from the SSC’s February 2023 workshop, and the NMFS Being Sea, Gulf of Alaska, and Arctic Climate Science Strategy Regional Action Plans. The themes are summarized below (and described in more detail in the October 2023 [staff paper](#)). These themes will continue to guide Council work in support of climate related fisheries management planning and implementation efforts.

Theme 1: Support a Council process that can be both proactive and responsive

The Council can develop strategies to think proactively, respond quickly, and better understand linkages between management approaches and adaptive capacity, including by:

- Evaluating and improving the climate resilience of management actions: The Council can build on the CRS by taking a comprehensive look at its management tools to better understand their current flexibility and limitations, how they interact, and think about how to build approaches that are specifically designed to work well under climate change.
- Learning from past experience and “what if” scenarios: The Council has already experienced climate-related disruptions to the Gulf of Alaska Pacific cod and Bering Sea crab stocks. The Council can analyze what has been learned from these experiences, as well as explore and test hypothetical future scenarios to consider how to respond. The 2024 Climate Scenarios workshop will support this.
- Supporting a timely, responsive Council process: The decision-making and regulatory process are designed to support deliberation and public involvement, and can move slowly as a result. The Council can explore how to support the public process while also enabling rapid response to change and systematically looking at management actions through a climate readiness lens. The Council can consider how to build climate adaptivity into prescriptive management actions such as harvest control rules.
- Building a shared understanding of resilience and adaptative capacity: People, communities, and fisheries are likely to respond to climate change in very different and personal ways. Discussing resilience and adaptive capacity with the Council community could help build a shared understanding of how and why people might respond to change, and how these responses might impact the effectiveness of management measures.

Theme 2: Build and use climate information on-ramps

The Council can contribute to building on-ramps and capacity for considering climate information in Council processes, including by:

- Including more climate information in analytical products: The CRS describes opportunities for increasing the uptake of climate information into SAFE reports and Ecosystem Status Reports. There are opportunities for further dialogue with SAFE report authors, especially as the Council refines its priorities and information needs for climate readiness including through the PEIS process and 2024 Climate Scenario Workshops.
- Strengthening the Council community's ability to talk about risk: Climate change will require making decisions in the face of increasing uncertainty, and clearly communicating with stakeholders about the likelihood and consequences of climate change impacts. The Council can become more conversant in the language of risk and risk tolerance through more dialogue with the SSC (i.e., the newly formed Council-SSC subgroup) and exploration of risk-based management approaches and tools including risk policies and risk tables.
- Linking ecosystem approaches with climate readiness: Ecosystem-based management approaches can help account for changing ecosystem conditions and provide a pathway for bringing diverse sources of knowledge into the Council process. The Council can more clearly articulate how EBFM supports climate readiness and continue building on EBFM approaches.

Theme 3: Include stakeholders and partners in building climate readiness

The Council can more fully integrate diverse knowledge bases and support two-way stakeholder engagement to support climate readiness, including by:

- Strengthening engagement with Alaska Native communities: The Council can take steps to more fully integrate traditional knowledge and support two-way dialogue with Tribes and stakeholders, as detailed in the LKTKS protocol and on-ramps documents, and the CRS.
- Communicating clearly and regularly about climate readiness planning: Climate change amplifies the need for the Council to communicate about its work and to discuss complex issues in clear, accessible terms. The Council can consider how to create new and more accessible opportunities for participation and information sharing.
- Building a stronger network of partnerships: Climate change deepens the need for coordination and collaboration across agencies, research partners, industry sectors, communities, tribal governments, and other groups to share knowledge, fill data gaps, and account for the impacts of other activities. The Council can continue efforts to increase accessibility and broad participation in the Council process. Workshops are one way to provide greater access.