



D4 Programmatic Evaluation

October 2025

Action Memo

Council staff: Katie Latanich

Action required: Determine next steps on the Programmatic Evaluation

BACKGROUND

At the Council's direction, and in response to public testimony and capacity concerns, staff work on the Programmatic Evaluation is currently on pause. At this meeting, staff are requesting direction on next steps, and whether the Council would like to resume staff work on this action or take no further action at this time.

The Council initiated the Programmatic Evaluation in 2023, following discussions through the Council's Ecosystem Committee. The action associated with the Programmatic Evaluation is to revise¹ the management policy, goals, and objectives for all federal fisheries managed under the Magnuson-Stevens Fishery Management and Conservation Act (Magnuson-Stevens Act or MSA) and the Northern Pacific Halibut Act (Halibut Act) under the authority of the North Pacific Fishery Management Council (Council) in the Gulf of Alaska, the Bering Sea, and Aleutian Islands. The purpose of this action would be to ensure that the Council's policy guidance, as stated in the goals and objectives for each fishery management plan (FMP), is comprehensive, can meet current and forthcoming challenges in the federal fisheries, and improves the Council's ecosystem-based management approach.

In addition to a draft Purpose and Need Statement, the Council adopted the following alternatives for this action in June 2023²:

Alternative 1: Maintain current ecosystem-based management policy and objectives for Council managed fisheries (status quo).

Alternative 2: 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 Council last considered the Programmatic Evaluation at its April 2025 meeting. Consistent with Council direction, staff prepared a [discussion document](#) that included a draft set of cross-FMP goals and examples of potential management objectives associated with Alternative 2 as a starting point for further

¹ While the Council's June 2023 motion used the term "clarify," any changes to the management policy, goals, and objectives stated in the FMP would result in an amendment to the FMP. As such, and to avoid ambiguity, the potential Federal action is identified as "revising" the management policy and objectives. This and other proposed changes to the Purpose and Need Statement are provided in the C4 April 2025 [discussion document](#).

² D2 Council [motion](#), June 2023

discussion by the Council and public, and to allow staff to begin a detailed analysis of this action.³ The Council received an Advisory Panel report and public testimony that supported conducting a retrospective evaluation of whether existing policy guidance has been met. Comments also expressed the perception that the current scope of the Programmatic Evaluation has evolved from earlier discussions and may no longer meet the public’s expectations for this action. At the April meeting, **the Council recommended pausing work on the Programmatic Evaluation “to reassess Council and NMFS resources and allow for further consideration of the need, appropriate vehicle, and process to address changes to Fishery Management Plan (FMP) goals and objectives.”**⁴

Council and NMFS resources and capacity continue to be a source of uncertainty. Council staff work on the Programmatic Evaluation is supported by Inflation Reduction Act (IRA) funding. Since April, the Council has received from NMFS the full \$2.5 million of funding it applied for to support climate readiness planning. However, recent and potential changes to NMFS staffing and budget unpredictability for both organizations create ongoing uncertainty. Additional considerations associated with possible directions for the Council on this action are discussed below.

OPTIONS FOR NEXT STEPS

Option 1: Resume staff work on the Programmatic Evaluation

The Council could choose to resume staff work on the Programmatic Evaluation, recognizing Council and NMFS resources and capacity continue to be a source of uncertainty. **If the Council directs staff to resume work on the Programmatic Evaluation, staff would also request clear guidance on Alternative 2 at this time.** As emphasized during the April 2025 discussion of this action, a clearly defined set of alternatives is needed for staff to proceed with analysis. It is important for the Council and public to understand the potential scope of changes to FMP policies, goals, and objectives that could be considered through this action, and how the Council intends for revised policy guidance to shape future management actions. As with every Council action, staff would work with NMFS to determine the appropriate analytical steps and level of NEPA review for this action once the Council defines a clear set of alternatives.

In order to provide this feedback the Council could refer to the [discussion document](#) provided for the Council's April 2025 discussion of the Programmatic Evaluation. Based on the Council’s earlier direction to staff, this discussion document provided a draft set of revised cross-FMP goals and examples of corresponding management objectives to help elicit feedback and structure a discussion of next steps. The revised goals and examples of management objectives provided in this document are largely based on the Council’s ongoing climate resilience planning including the work of the Climate Change Task Force, discussions at the June 2024 Climate Scenarios Workshop, and the work of the Local Knowledge, Traditional Knowledge, and Subsistence Task Force.

At the April meeting, staff requested more guidance on how the Council intends to interpret Alternative 2 to *Adopt a more adaptive ecosystem-based management policy and objectives*, including the following prompts:

- Does the Council want to consider an approach to Alternative 2 that would update FMP policy language to be more in line with existing and planned Council initiatives? (This is described as Approach 2a in the April 2025 discussion document.)
- Does the Council want to consider an approach that is more precautionary and risk averse than the current trajectory? If so, what could this look like? What are examples of more risk-averse

³ C4 Programmatic Evaluation [Discussion Paper](#), April 2025

⁴ C4 Programmatic Evaluation [motion](#), April 2025

management objectives the Council would like to consider for analysis? (This is described as Approach 2b in the April 2025 discussion document.)

If the Council resumes work on the Programmatic Evaluation, staff would strongly encourage the Council to provide clear guidance to ensure an analysis is responsive to the Council's interests and helps to move the discussion forward. Specifically, staff would request direction on 1) whether the Council has a preferred approach to interpreting Alternative 2 or would like to consider both approaches described in the April 2025 discussion document, and 2) the substance of a more risk-averse and precautionary approach, if this is an approach the Council would like to consider.

Option 2: Take no further action on the Programmatic Evaluation at this time

The vehicle and process for setting FMP policy guidance are Council decisions, and **there is no requirement for the Council to update policy guidance via the Programmatic Evaluation process.** If the Council chooses to take no further action, staff would not schedule the Programmatic Evaluation for further discussion unless directed to do so. **As with any action, the Council could choose to bring this action back at any time, but may need to develop a new or revised Purpose and Need statement and alternatives.**

If the Council recommends taking no further action on the Programmatic Evaluation at this time there are two next steps that staff will undertake.

1. *Adjustments to IRA workplan:* Taking no further action on the Programmatic Evaluation would necessitate adjustments to the Council's IRA work plan. The Council's IRA funding proposal envisioned the Programmatic Evaluation as a vehicle for supporting two of the three funding objectives: Objective 1: Develop a climate-resilient management policy and Objective 2: Continue work to incorporate Local Knowledge and Traditional Knowledge. If the Programmatic Evaluation does not move forward, staff will propose potential adjustments, including adjustments to how resources are allocated to the three IRA funding objectives. Staff would provide an update on IRA work planning during staff tasking at a future meeting.
2. *Reinstitute triennial review of Groundfish FMP Objectives:* The Council generally conducts a comprehensive review of its Groundfish Management Policy every three years.⁵ This is not an MSA requirement, but the Council established this regular review cycle in the Groundfish FMPs as a means for adaptive management. The most recent [triennial review](#) was completed in 2022 and provides an example of the structure and content of previous reviews.⁶ Reviews are typically discussed by the Council early in the calendar year, and the next triennial review would have been folded into the Programmatic Evaluation process.⁷ **If the Council chooses to take no further action on the Programmatic Evaluation, staff will switch gears and resume preparation of a Groundfish Management Policy review.**

This review could follow the same approach as prior reviews, which involved reviewing a summary of Council activities relative to Groundfish FMP goals and objectives, with focus on the time period since the last review occurred, and provided an opportunity for the Council to consider whether to undertake additional activities to fulfill goals and objectives. It may also be appropriate for this review to take into account a longer-term perspective, comprehending the full 20 years since the Council adopted the policy, or other Council priorities that have emerged in

⁵ Reviews were conducted annually through 2019, when the Council moved to change the review cycle to every three years to align with the multi-year timespan of major Council actions. See D5 [motion](#), February 2019

⁶ D3 Groundfish Management Policy [Review](#), February 2022

⁷ The Council's E1 Groundfish Workplan [Update](#) from April 2025 clarified that "the Council's action to initiate a revised Programmatic Evaluation of Council fisheries, to be reviewed in 2025-2026, [would] constitute the next comprehensive review."

more recent years. For example, the review process could provide a vehicle for considering Council policy guidance on, for example, climate resilience and integration of Local Knowledge, Traditional Knowledge, and Subsistence information, which have also been a focus of the Programmatic Evaluation process. Staff would prepare a short work plan for this action for the Council to discuss during staff tasking at the December 2025 meeting.

This review is only required by and would be limited to the Groundfish FMPs at this time, in order to adhere to the requirements and schedule for triennial reviews and due to limitations on staff capacity. If the Council finds this exercise valuable, it could consider applying a similar approach to other FMPs in the future.