

C4 Programmatic Evaluation

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- Background
- Discussion document Section 4.2: Examples of revised cross-FMP goals and potential objectives
- Potential actions



Informational Webinar

- Held March 6th, recording available on the Council's YouTube channel
- Informational only; orientation to discussion materials and opportunities for engagement

[illegible]

Purpose and need statement

Adopted June 2023

The federal action under consideration is to clarify the management policy and objectives for all federal fisheries managed under the Magnuson-Stevens Act and the Halibut Act under the jurisdiction of the North Pacific Fishery Management Council (Council) in the Gulf of Alaska, the Bering Sea, and Aleutian Islands, including objectives for adapting to the effects of climate change. The purpose of this action is to ensure that the management framework of the Council is adequate to meet current and forthcoming challenges in the federal fisheries, and to describe and implement that framework in a comprehensive manner to improve the Council's ecosystem-based management approach. Given changing conditions in the fisheries, new Council efforts, and significant climate-related impacts on the marine ecosystem, there is a need to evaluate the management policy and objectives for federal fishery management to be adaptable and responsive in order to better meet the objectives of the Magnuson Stevens Act and Halibut Act, to ensure long-term sustainability of the stocks managed under those statutes, and to sustain participation in and benefits from the fisheries over time. The Council intends to ensure that the management framework is structured to use the best available science, which includes climate science and local and traditional knowledge, and also recognizes Alaska tribes and communities that rely on subsistence resources.



Purpose and need statement

Adopted June 2023

The federal action under consideration is to ~~clarify~~ **revise** the management policy, **goals** and objectives for all federal fisheries managed under the Magnuson-Stevens Act and the Halibut Act under the ~~jurisdiction~~ **authority** of the North Pacific Fishery Management Council (Council) in the Gulf of Alaska, the Bering Sea, and Aleutian Islands, including objectives for adapting to the effects of climate change. The purpose of this action is to ensure that the ~~management framework of the Council's~~ **policy guidance** is ~~adequate~~ **comprehensive, can** to meet current and forthcoming challenges in the federal fisheries, and ~~to describe and implement that framework in a comprehensive manner to improve~~ **s** the Council's ecosystem-based management approach. Given changing conditions in the fisheries, new Council efforts, and significant climate-related impacts on the marine ecosystem, there is a need to evaluate the management policy, **goals** and objectives for federal fishery management to be adaptable and responsive in order to better meet the objectives of the Magnuson Stevens Act and Halibut Act, to ensure long-term sustainability of the stocks managed under those statutes, and to sustain participation in and benefits from the fisheries over time. The Council intends to ensure that the ~~management framework~~ **policy guidance** is structured to use the best available science, which includes climate science and local and traditional knowledge, and also recognizes Alaska tribes and communities that rely on subsistence resources.



Dec 2024 → April 2025 & Potential Action

As directed by the Council (December 2024), the discussion document provides **ideas** for revised, cross-FMP **goals** and **objectives** as a starting point for discussion (also referred to as “strawman” language), using Groundfish FMP goals as a starting point.

This will be an iterative process. Short term:

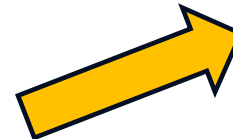
1. Minor revisions to Purpose and Need Statement (see document)
2. Discuss and potentially adopt a set of goals for further analysis (based on Groundfish FMP)
3. Provide direction on objectives that could support Alternative 2

Policy Statement

Goals

Objectives

Tactics and strategies



Programmatic Evaluation basics

- **What:** Ensure the Council's policy guidance is comprehensive, can meet current and forthcoming challenges, and improves the Council's ecosystem-based approach
 - Use best available science, including climate science and LKTKS
 - Recognize Alaska tribes and communities that rely on subsistence resources
- **Why:** Changing conditions, new Council efforts, and significant climate-related impacts to North Pacific fisheries
- **How:** Revise the management policy, goals, and objectives for all FMPs under the authority of the Council (excluding the Arctic)
 - Original intent to analyze through NEPA process and preparation of EIS



National Environmental Policy Act (NEPA)

- NEPA is not action forcing.
- NEPA is a policy mechanism to evaluate the potential environmental impacts of Federal actions significantly affecting the quality of the human environment.
- After the Council selects an action (FMP amendment and/or regulation change), NMFS uses established criteria to determine the appropriate NEPA document (more on next slide).



NEPA results in one (or more) of three documents

1. Categorical Exclusion (CE)

- Action fits into an established category and has no significant effects on the quality of the human environment

2. Environmental Assessment (EA)

- determines whether an action has the potential to cause significant effects on the quality of the human environment. Results in either:
 - i. Finding of No Significant Impact (FONSI) report, or
 - ii. Go to step 3 (EIS)

3. Environmental Impact Assessment (EIS)

- Potentially significant impacts to the quality of the human environment
- Record of Decision (ROD)



Language clarification: Programmatic

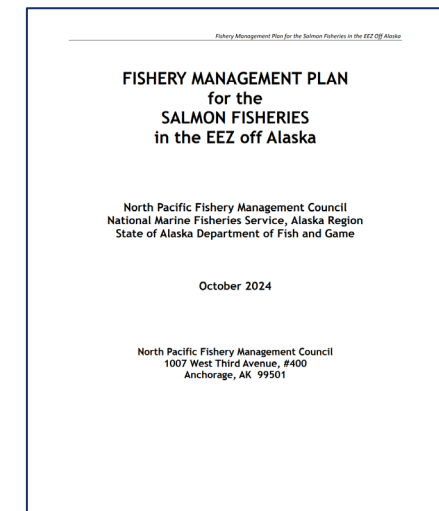
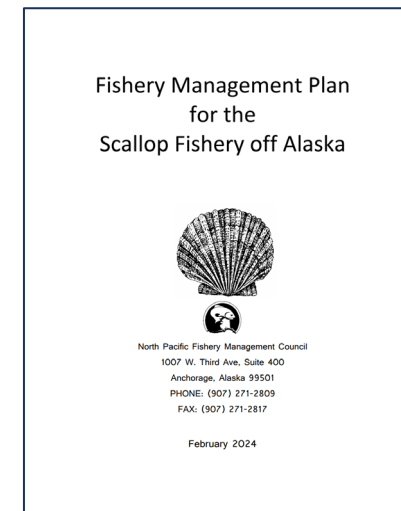
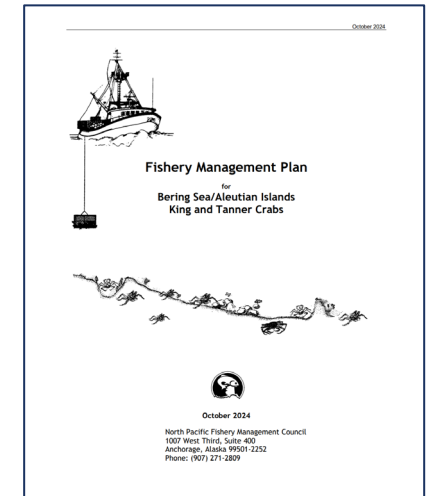
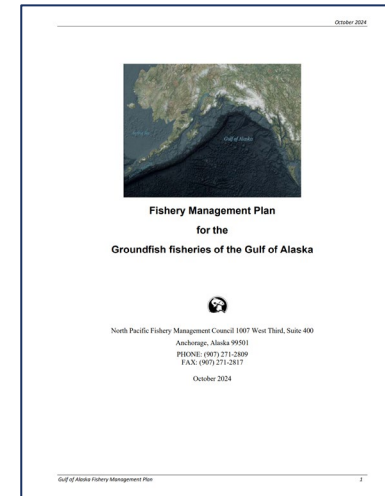
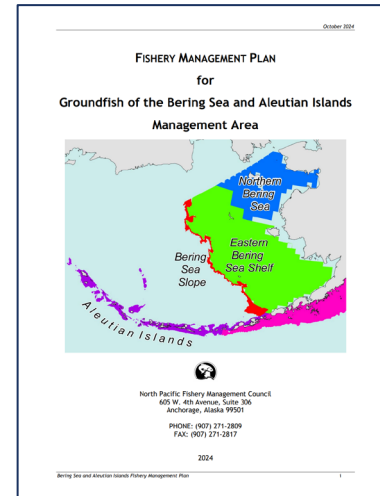
- A **programmatic action** - the current action, evaluating at the program or FMP level, changes to the goals, objectives...
- **Programmatic EIS** - a level of analysis under NEPA that examines at the program or FMP level, the effects of changes to the FMP on the human environment.

This programmatic evaluation is not a replacement of the 2004 PSEIS nor the 2015 SIR.



Where do current FMP policies, goals, and objectives live?

- Each of the Council's FMPs includes a section on policies, goals, and objectives
- Structured differently and developed at different times in the Council's history
- Other Council policies and documents provide strategic guidance
 - NPFMC Ecosystem Policy
 - Bering Sea Fishery Ecosystem Plan
 - Local Knowledge, Traditional Knowledge, and Subsistence Information Protocol



Developing consistent guidance across FMPs



**Focus of
Programmatic
Evaluation**



How can updated policy guidance be useful?

- **Does not result in immediate nor required changes to management measures, not action forcing**
- Look ahead; recognize emerging challenges
- Document practices for using best available science
- Communicate the Council's values and priorities
- Provide transparency and rationale
- Guide and inform future Council actions
- Provide a template to evaluate progress



How and when does the Council refer to FMP guidance?

Example: Groundfish
workplan updates
(December 2024)

Goal	Management Objective	Council actions	
		October 2024	December 2024
1. Prevent Overfishing <i>Maintain Sustainable Harvest</i>	1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.	Climate workshop report • Climate science/SCS8 paper • Groundfish harvest proposed specifications • GOA rockfish spatial mgmt	• Climate planning discussion • Groundfish harvest final specifications
	2. Continue to use the optimum yield caps for the BSAI and GOA groundfish fisheries.		
	3. Provide for adaptive management by continuing to specify optimum yield as a range.		
	4. Provide for periodic reviews of the adequacy of F40 and adopt improvements, as appropriate.		
	5. Continue to improve the management of species through species categories.		
2. Promote Sustainable Fisheries and Communities	6. Promote conservation while providing for optimum yield in terms of the greatest overall benefit to the nation with particular reference to food production, and sustainable opportunities for recreational, subsistence, and commercial fishing participants and fishing communities.	These considerations are applied in all Council management recommendations. See specific actions also under Goals 1,7 and 8. • USCG Reports	
	7. Promote management measures that, while meeting conservation objectives, are also designed to avoid significant disruption of existing social and economic structures		
	8. Promote fair and equitable allocation of identified available resources in a manner such that no particular sector, group or entity acquires an excessive share of the privileges.		
	9. Promote increased safety at sea.		



Comparing and contrasting FMP guidance

Discussion document includes:

- Appendices with current FMP policies, goals, and objectives
- Excerpts from other sources of guidance (Ecosystem Approach, Bering Sea FEP, LKTKS Protocol)
- Tables comparing **structure** and **content**

Example: Table 3: Comparison of FMP goals and objectives by theme

Theme	References National Standards?	Groundfish FMPs	Crab FMP	Scallop FMP	Salmon FMP
Groundfish goal themes					
1 - Biological sustainability	1	Yes	Yes	Yes	Yes
2 - Social and economic benefits; communities	8	Yes	Yes	Yes	Yes
3 - Ecosystems	NA	Yes	No	No	No
4 - Bycatch	9	Yes	No	No	Yes



Programmatic Evaluation Alternatives

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.



Interpreting and analyzing Alternative 2

How does the Council want to interpret and analyze Alternative 2? Objectives could look more like:

- **Approach 2a, Planned initiatives:** Objectives could reflect risk-averse and adaptive work that is planned or ongoing
- **Approach 2b, More risk averse:** Objectives could reflect a stronger, more risk-averse approach to achieving goals and outcomes such as biological sustainability, community resilience, flexible and responsive management, Tribal and community engagement, and/or other goals

The Council may wish to explore one or both approaches. The discussion document explores both of these approaches.



Cross-FMP goals and objectives

Why consider revisions to goals and objectives?

- To support the Purpose and Need Statement and Alternative 2 (adaptive, ecosystem-based, use best available science, ...)
- To improve consistency across FMPs
- To recognize current conditions and challenges
- To reflect and clarify current Council practices and reinforce other guidance (e.g., Ecosystem Policy, Bering Sea FEP, LKTK Protocol)

Revisions are suggested for some but not all goals



Cross-FMP goals and objectives

Where do ideas for revised goals and objectives come from?

(not comprehensive, see Section 3.2)

- Council's climate work and products: Climate Readiness Synthesis, Final Report, Climate Resilience workplan (in progress), report from Climate Scenarios Workshop
- Integration of the Council's Ecosystem Policy
- SSC workshops
- Consistency with the LKTKS Protocol
- Consistency with the National Standards
- Consistency with NMFS guidance



Discussion Document Section 4.2: Examples of revised cross-FMP goals and potential objectives



Contents of Section 4.2

Table 2: Main content of discussion document

- Provides **examples** of how Groundfish FMP goals could be revised as cross-FMP goals
- Provides **examples** of objectives, based on recent Council work and discussions
 - 2a: Existing or planned initiatives – ideas provided
 - 2b: More risk averse approach – *some* ideas provided
- **This is a summary** - see Appendix 1 for additional discussion

Table 2: Revised cross-FMP goals and examples of objectives under different approaches to Alternative 2

	Alternative 1	Alternative 2		
Theme	Current Groundfish FMP Goal	Examples of revised cross-FMP Goal	Example objectives Approach 2a: Existing or planned initiatives	Example objectives Approach 2b: More risk averse
1 - Biological sustainability	Prevent overfishing	Prevent overfishing, achieve optimum yield, and maintain long-term biological sustainability of managed stocks.	<ul style="list-style-type: none">• Develop and review harvest policies that consider and are responsive to climate-driven uncertainty and risks• Consider climate information in rebuilding plans	<ul style="list-style-type: none">• Adopt a more precautionary approach to mitigate and buffer against climate impacts



Contents of Section 4.2

Process reminders

- Based on existing Groundfish FMP goals (9) and objectives (45) as a starting point
- This table focuses on new information – not all existing groundfish objectives are carried through at this time
- Carryover of existing groundfish and other FMP goals and objectives would be addressed later

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Section 4.2: Examples of revised goals and potential objectives

Orientation to Table 2: Revised goals

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Example cross-FMP goals

More substantial changes:

Goal 1 – Biological sustainability

Goal 2 – Social and economic benefits; communities

Goal 3 – Ecosystems

Goal 7 – Management measures

Goal 8 – Tribal and community access and engagement

Goal 9 – Best available science

Goal 10 (added) – Council process

No changes suggested:

- Goal 4 – Bycatch; Goal 5 – Seabirds and marine mammals; Goal 6 - Habitat

- Summary of revisions and potential objectives is provided in Table 2 of Section 4.2
- Detailed explanation in Appendix 1



Goal 3 - Ecosystems

Current Groundfish FMP goal: Preserve food web

Example (revised) cross-FMP goal: Maintain healthy, productive, biodiverse, and resilient marine ecosystems that support sustainable fisheries and a range of services and users

Why consider revisions? (described in Appendix 1)

- Wording adapted from Ecosystem Policy
- Include the updated term “ecosystem” in place of “food web”
- Link healthy ecosystems with desired outcomes, including biological sustainability, resilience, and benefits to user groups



Goal 8 – Tribal and community access and engagement

Current Groundfish FMP goal: Increase Alaska Native Consultation

Example (revised) cross-FMP goal: Support Tribal and community access and engagement

Why consider revisions?

- Would improve consistency across FMPs
- Clarify the Council's responsibilities and practices with regard to Tribal Consultations
- Distinguish between formal Tribal Consultation (NMFS) and expand the goal to include additional forms of engagement and outreach that the Council also supports.



Goal 9 – Best available science

Current Groundfish FMP goal: Improve data quality, monitoring, and enforcement

Example (revised) cross-FMP goal: Use best available science that draws on the full range of available sources

Why consider revisions?

- Focus wording on best available science
- Include the “full range of available sources” to recognize a broad range of information inputs and knowledge systems, including climate science and LKTKS



Goal 10 – Council process (added)

Current Groundfish FMP goal: NA

Example cross-FMP goal: Support an open, transparent, and inclusive public process

Why consider adding a Council process goal?

- Consistency across FMPs
- Recognize ideas from the Climate Scenarios Workshop
- Provide a way to identify consistent, actionable objectives and evaluate progress toward their implementation



Section 4.2: Examples of revised goals and potential objectives

Orientation to Table 2: Examples of revised objectives

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Example objectives for Goal 1 – Biological sustainability under Approach 2a

Goal 1 – Biological sustainability

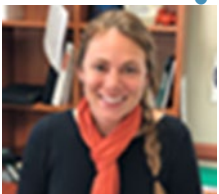
Current Groundfish FMP goal: Prevent overfishing

Example (revised) cross-FMP goal: Prevent overfishing, achieve optimum yield, and maintain long-term biological sustainability of managed stocks.

What could this look like in practice?

Example objectives under **Approach 2a: Existing or planned initiatives**

- Develop and review harvest policies that consider and are responsive to climate-driven uncertainty and risks
- Consider climate information in rebuilding plans



Example objectives for Goal 1 – Biological sustainability under Approach 2b

Goal 1 – Biological sustainability

Current Groundfish FMP goal: Prevent overfishing

Example (revised) cross-FMP goal: Prevent overfishing, achieve optimum yield, and maintain long-term biological sustainability of managed stocks.

What could this look like in practice? Another approach

Example objectives under **Approach 2b: More risk averse**

- Adopt a more precautionary approach to mitigate and buffer against climate impacts



Example objectives for Goal 7 – Management measures under Approach 2a

Goal 7 – Management measures

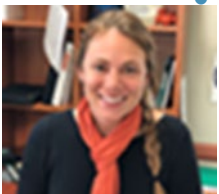
Current Groundfish FMP goal: Promote equitable and efficient use of fishery resources

Example (revised) cross-FMP goal: Promote flexible, responsive management measures that enable adaptation to changing conditions

What could this look like in practice?

Example objectives under **Approach 2a: Existing or planned initiatives**

- Improve capacity and procedural mechanisms to support timely response to early warnings and signals of change
- Support the adaptive capacity of people and communities by identifying barriers and solutions to enable diversification and flexibility



Example objectives for Goal 7 – Management measures under Approach 2b

Goal 7 – Management measures

Current Groundfish FMP goal: Promote equitable and efficient use of fishery resources

Example (revised) cross-FMP goal: Promote flexible, responsive management measures that enable adaptation to changing conditions

Example objectives for Goal 7 – Management measures under Approach 2a

What could this look like in practice? Another approach

Example objectives under **Approach 2b: More risk averse**

- Consider “if-then” mechanisms for automating climate-informed management responses
- Develop capacity to support flexible and responsive management tools including dynamic and in-season management



Interpreting and analyzing Alternative 2

Questions to consider:

- Does the Council want to consider an approach that looks more like Approach 2a (planned and existing initiatives), or Approach 2b (more risk averse than Approach 2a for one or more goals)? Or both?
- What are examples of more risk-averse management objectives? (Examples are provided for some goals but not others, reflecting Council and public discussions)

The Council could choose to explore both approaches, as well as to add to or modify the two existing alternatives.



Potential action April 2025

1. Minor revisions to Purpose and Need Statement
2. Discuss and potentially adopt a set of goals for further analysis
3. Provide direction on objectives for Alternative 2
 - Approach 2a: Existing or planned initiatives
 - Approach 2b: More risk averse

Reminder: the Council has flexibility to make changes at any point prior to final action



Next steps

Steps for later in the process

- Finalize wording of goals and objectives
- Develop and approve policy statement
- Further discussion of key questions e.g., defining precautionary and risk averse
- Cleanup and carryover of existing FMP guidance (Groundfish, Crab, Scallop, Salmon FMPs)

Late 2025 and beyond

- Coordinate with NMFS staff to assess appropriate level of NEPA analysis
- Staff would begin draft analysis for initial review
- Potential for progress update Oct 2025 at the earliest
- Draft analysis in first half of 2026

