

D4 Programmatic Evaluation

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October 2025



D4 Action memo: Programmatic Evaluation

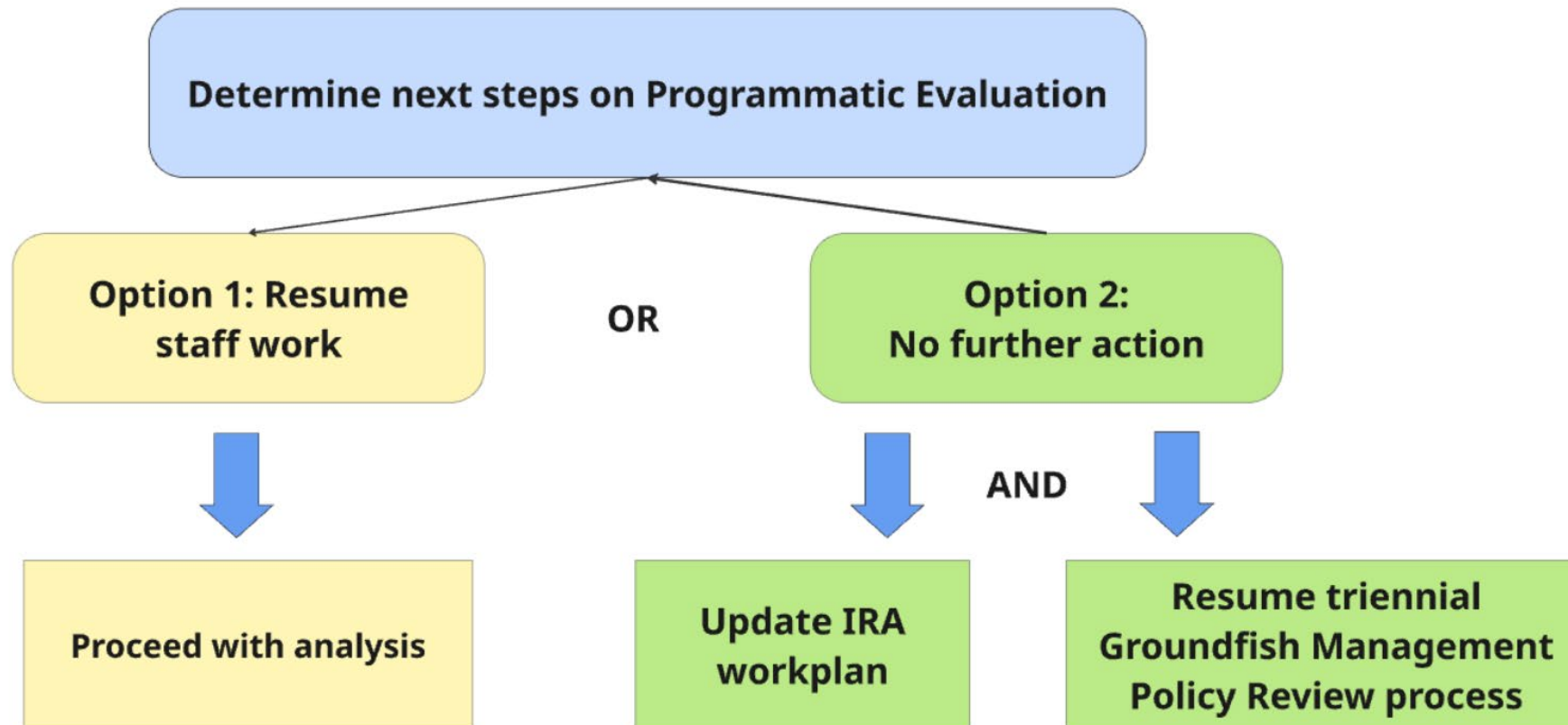
Current status: Staff work paused

April 2025 C4 Council [motion](#): The Council recommends pausing the Programmatic evaluation process 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.



D4 Action memo: Programmatic Evaluation

October 2025 decision point and implications



Review: April 2025 C4 Discussion on the Programmatic Evaluation



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.**

**The C4 April 2025 [discussion document](#) suggested minor wording changes including using the term “revising” the management policy and objectives*



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)



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.



Looking back: C4 Discussion, April 2025

December 2024: Council directs staff to develop discussion document, including draft language as a starting point for discussion

April 2025 potential actions:

- Review [discussion document](#)
- Review and approve proposed wording changes to Purpose and Need Statement
- Provide further guidance on Alternative 2 including a revised set of high level, cross-FMP **goals** and further direction on the range of management **objectives** to be included in the analysis



Looking back: C4 Discussion, April 2025

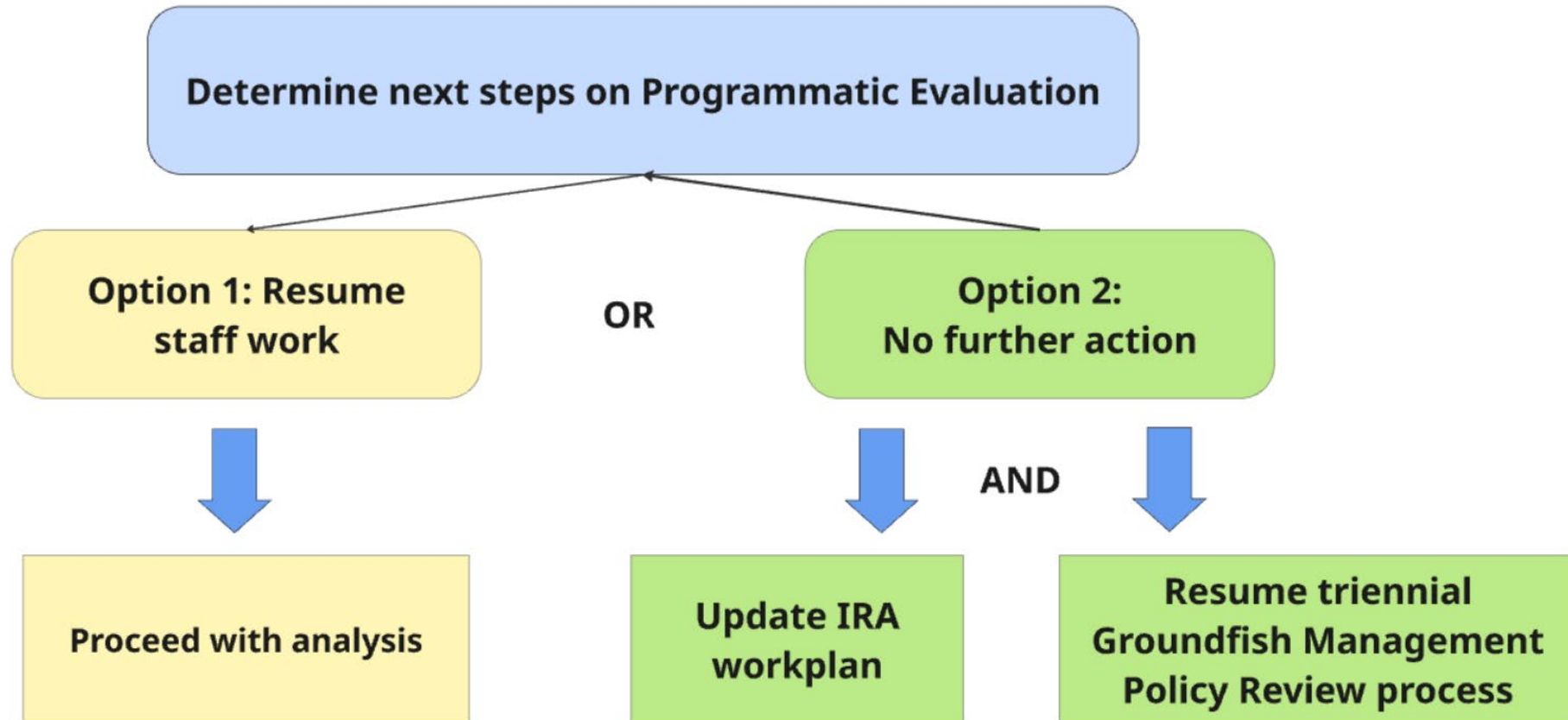
April 2025 C4 Council [motion](#): The Council recommends pausing the Programmatic evaluation process to reassess Council and NMFS resources and allow for further consideration of the need, appropriate vehicle, and process to address changes to Fishery Management Plan (FMP) goals and objectives.



October 2025 Discussion



October 2025 decision point and implications

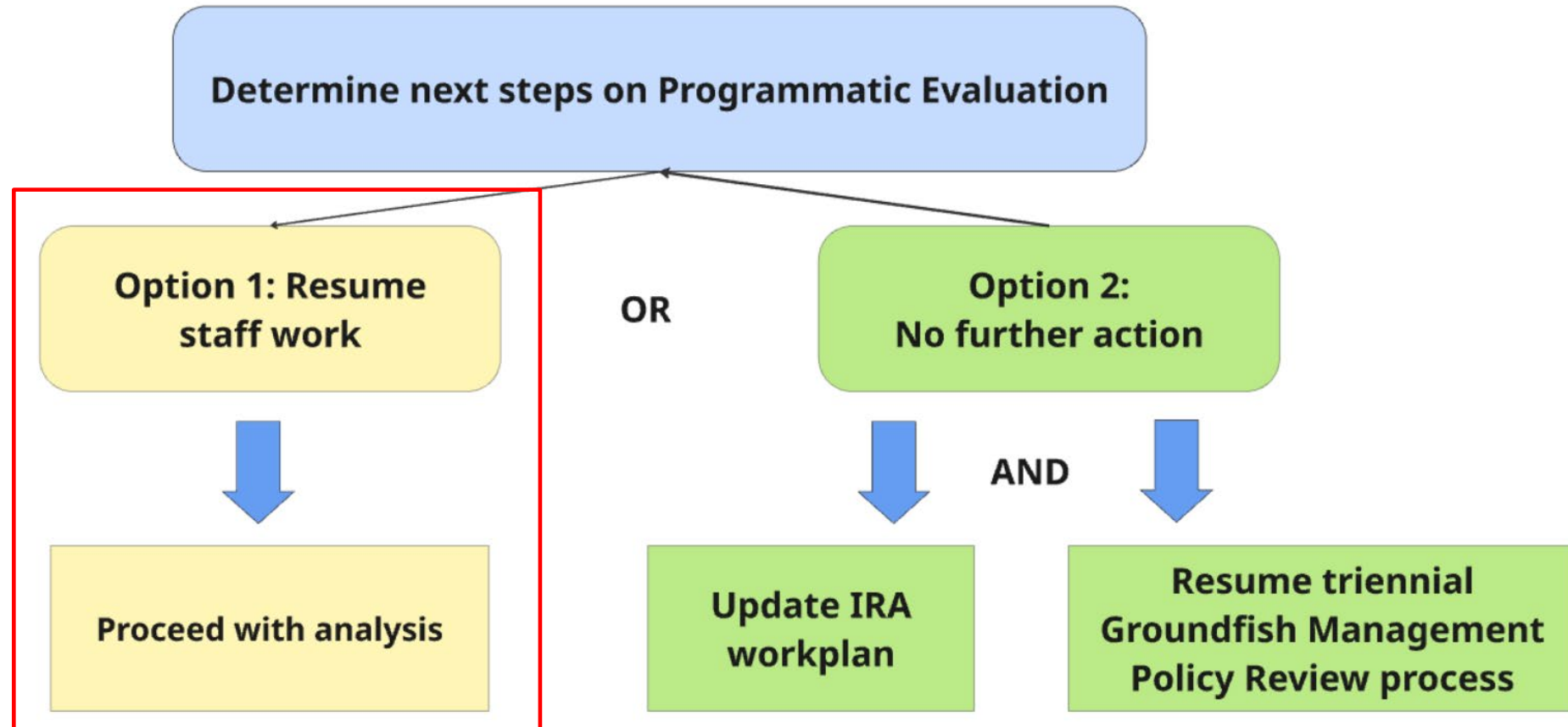


Council and NMFS resources

- The Council has received from NMFS the full \$2.5 million in funding it applied for to support climate readiness planning
 - Staff work on the Programmatic Evaluation is supported by IRA funding
 - IRA funding can support other staff work in support of the Council's IRA funding proposal objectives
- Recent and potential changes to NMFS staffing and budget unpredictability for both organizations create ongoing uncertainty



October 2025 decision point and implications



Option 1: Resume staff work on the Programmatic Evaluation

In order to proceed with the analysis, staff would request clear guidance on Alternative 2, as outlined in the April 2025 Programmatic Evaluation Discussion Document.

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.



Option 1: Resume staff work on the Programmatic Evaluation

A clearly defined set of alternatives is necessary 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
- Council staff to **develop an analysis** that is responsive to the Council's interests and helps move the discussion forward
- Council and NMFS staff to **determine the appropriate analytical steps and level of NEPA review** for this action



Option 1: Resume staff work on the Programmatic Evaluation

If the Council wishes to resume staff work on the Programmatic Evaluation, consider revisiting the information provided in the April 2025 Discussion Document.

At the Council's direction (December 2024), this document provides examples of revised goals and objectives as a starting point for further discussion by the Council and public. Example language is provided in Table 2 of the document.

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



Option 1: Resume staff work on the Programmatic Evaluation

Ideas for revised goals and objectives (as provided in the April 2025 discussion document) reflect:

- Work and products of the Bering Sea FEP Climate Change Task Force (Climate Readiness Synthesis, Final Report)
- Climate Resilience workplan (in progress)
- Discussions and final report from Climate Scenarios Workshop
- SSC workshops
- NMFS Alaska Fisheries Science Center work, including the Changing Ecosystem and Fisheries Initiative (CEFI)
- Consistency with the National Standards
- Opportunities for improving consistency across FMPs
- Consistency with and integration of the Council's Ecosystem Policy and Bering Sea FEP goals and objectives
- Consistency with the LKTKS Protocol
- Other ideas identified by the Council and SSC (e.g., Feb 2024 discussion document)
- Consistency with NMFS guidance



Option 1: Resume staff work on the Programmatic Evaluation

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

- Existing goals and objectives may not fully reflect current Council initiatives or recognize climate-related risks and challenges.



Option 1: Resume staff work on the Programmatic Evaluation

Alternative 2 describes a “more adaptive, ecosystem-based” approach to FMP policy guidance

The April 2025 discussion document outlines 2 approaches to interpreting and analyzing Alternative 2. The Council could choose to explore one or both.

- **Approach 2a, Planned initiatives:** Update FMP policy language to be more in line with existing and planned Council initiatives
- **Approach 2b, More risk averse:** Update FMP policy language to reflect a more risk-averse approach than the current trajectory to achieving goals and outcomes such as biological sustainability, community resilience, flexible and responsive management, Tribal and community engagement, and/or other goals



Option 1: Resume staff work on the Programmatic Evaluation

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.

Reminder: The Council would have flexibility to make changes at any point prior to final action



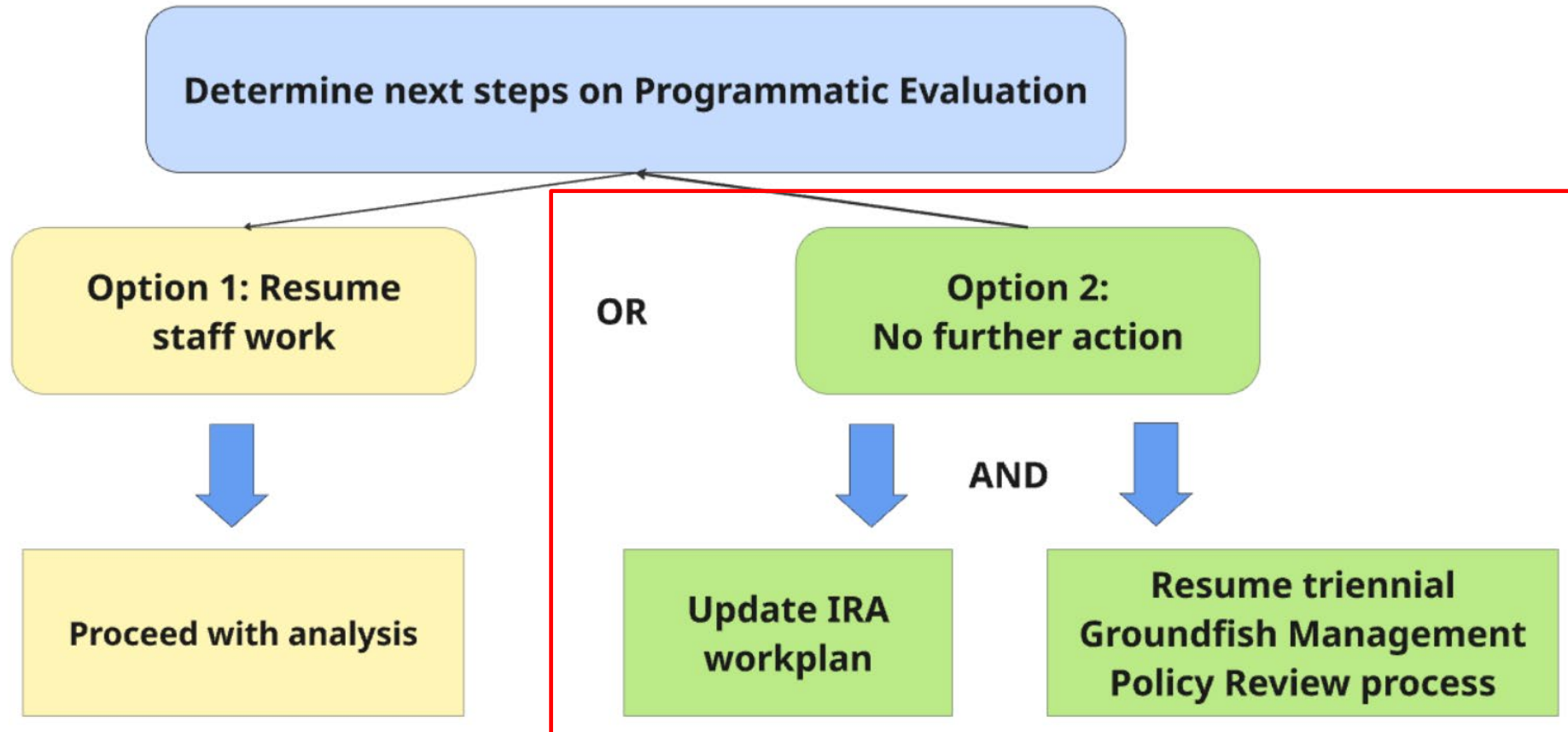
Option 1: Resume staff work on the Programmatic Evaluation

NEPA considerations

- 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
- Reminders
 - The Programmatic Evaluation is a new action, not a revision of, an update to, nor tiered from the 2004 PSEIS for the Groundfish FMPs
 - Changes to NEPA guidance including time and page limits



October 2025 decision point and implications



Option 2: No further action at this time

- There is no requirement for the Council to update policy guidance via the Programmatic Evaluation process
- Implications
 - 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
- Next steps (for later)
 - Adjustments to IRA funding workplan
 - Reinstitute triennial review of BSAI and GOA Groundfish FMP objectives



Option 2: IRA workplan adjustments

Implications for IRA funding workplan

- The Council's IRA funding proposal envisioned the Programmatic Evaluation as a vehicle for supporting Objectives 1 and 2
- Staff would propose potential adjustments, including adjustments to how resources are allocated to the three IRA funding objectives (tentative December 2025 update)

NPFMC IRA Funding Objectives

1. Develop a climate-resilient management policy
2. Continue work to incorporate Local Knowledge and Traditional Knowledge
3. Strengthen the consideration of uncertainty and risk in harvest specifications



Option 2: Reinstitute Groundfish Management Policy review process

Reinstitute triennial review of BSAI and GOA Groundfish FMP objectives

- Reviews are a long standing, self-imposed requirement established by the Groundfish FMPs in 2004
 - “Adaptive management requires regular and periodic review. Objectives identified in this policy statement will be reviewed annually by the Council. The Council will also review, modify, eliminate, or consider new issues, as appropriate, to best carry out the goals and objectives of this management policy.”
- Reviews now conducted every three years (previously annually)
- Most recent review completed in 2022 for the years 2019-2021



Option 2: Reinstitute Groundfish Management Policy review process

Triennial reviews build on regular Groundfish Programmatic Workplan updates.

- The Groundfish FMPs include 9 goals and 45 objectives
- A Workplan update is provided at every Council meeting during Staff Tasking
- Provide a **snapshot in time** that focuses on recent, current, ongoing, and pending actions and agenda items specific to the Groundfish FMPs



E1 Groundfish Workplan
APRIL 2025

Groundfish Programmatic Workplan

The Council conducted its most recent *comprehensive* review of its Programmatic Groundfish Management Policy¹ (Policy) at its February 2022 meeting², highlighting Council activities in calendar years 2019-2021 which continue to fulfill the Priorities and Objectives established in the Policy. Annual review of the Policy is a requirement of the GOA and BSAI Groundfish FMPs, and the Council fulfills that requirement through this Programmatic Workplan, a concise tool that presents Council actions relative to Policy Objectives and is provided at every Council meeting. The Council generally conducts a comprehensive review of the Policy every three years, in order to accommodate the multi-year lifespan of major Council actions. However, the Council's action to initiate a revised Programmatic Evaluation of Council fisheries, to be reviewed in 2025-2026, will constitute the next comprehensive review.

The table below provides a two-meeting (previous and current) snapshot of the Programmatic Workplan, listing only Council actions relate to the Groundfish FMPs and indicating their correspondence to Programmatic Management Objectives. Those Management Objectives were intended to support decision-making under the Groundfish FMPs. Although the Policy's EBFM approach is reflected in actions outside of the Groundfish FMPs, these other actions are not included in the table. The tabular presentation of the Programmatic Workplan below as well as prior versions of the table are available on the Council eAgendas: (<https://meetings.npfmc.org/>).

Goal	Management Objective	Council actions	
		December 2024	April 2025
1. Prevent Overfishing Maintain Sustainable Harvest	1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield. 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.	<ul style="list-style-type: none">• Climate workplan discussion• Groundfish harvest final specifications	<ul style="list-style-type: none">• Programmatic evaluation discussion
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. 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.	These considerations are applied in all Council management recommendations. See specific actions also under Goals 1, 7 and 8. • USCG Reports	

Option 2: Reinstitute Groundfish Management Policy review process

Groundfish Management Policy Reviews are **more comprehensive** than Groundfish Programmatic Workplan updates

- Include an expanded summary of Council activities related to goals and objectives over the review period (3 years vs. current meeting snapshot)
- Can include additional information beyond what is captured in single-meeting workplan updates
 - Examples: changes to Council practices, new information products, ongoing initiatives and Council priorities not linked to a single action



D3 Groundfish Management Policy Review
FEBRUARY 2022

Table 1. Council actions in 2019-2021 in relation to the Goals (column 1) and Objectives (column 2) of the Council's Programmatic Groundfish Management Policy. The actions reflected in the table are a mixture of specific Council meeting agenda items and ongoing management processes in 2019-2021.

Goal	Management Objective	Council actions
1. Prevent Overfishing Maintain Sustainable Harvest	1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.	• Annual Proposed and Final Groundfish Specifications for 2019-2023 • CIE reviews for various groundfish species • National Standard 1 technical guidance • Sculpins to ecosystem component category, product types adjustment
	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 Priorities 1, 7 and 8.
	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.	
		• USCG Reports • NIOSH Report



Option 2: Reinstitute Groundfish Management Policy review process

The next Groundfish Management Policy Review would have been folded into the Programmatic Evaluation process.

From April 2025 Workplan: “The Council generally conducts a comprehensive review of the Policy every three years, in order to accommodate the multi-year lifespan of major Council actions. However, the Council’s action to initiate a revised Programmatic Evaluation of Council fisheries, to be reviewed in 2025-2026, will constitute the next comprehensive review.”



E1 Groundfish Workplan
APRIL 2025

Groundfish Programmatic Workplan

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Option 2: Reinstitute Groundfish Management Policy review process

Typical Groundfish Management Policy Review actions (D3 [Action Memo](#), February 2022)

- Review the Programmatic Groundfish Management Policy
- Review Council actions relative to the Policy
- Consider whether modifications to the Management Objectives are called for
- Consider whether additional Council actions to better fulfill the Management Policy are required

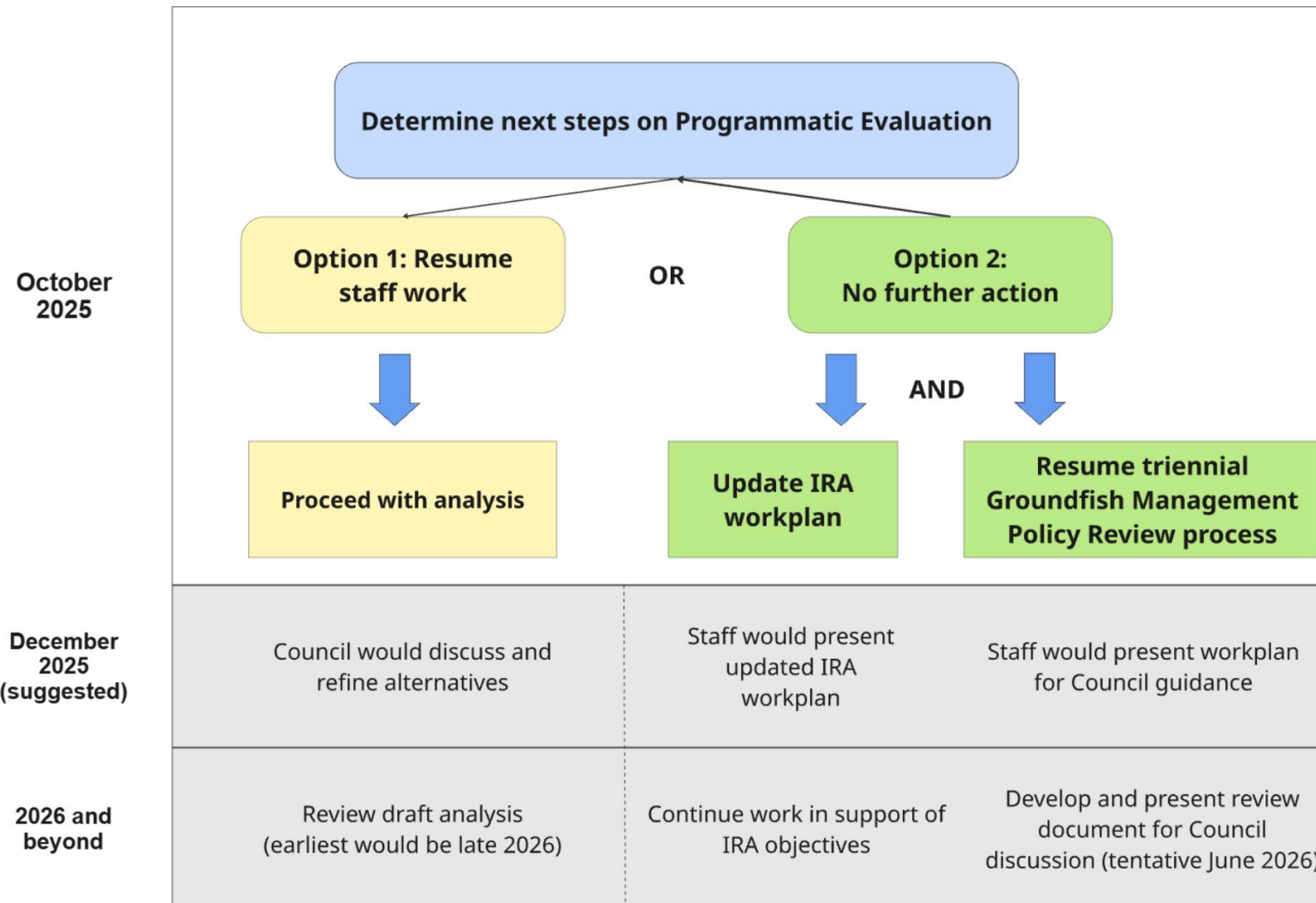


Option 2: Reinstitute Groundfish Management Policy review process

- The next Groundfish Management Policy Review could follow the approach of previous reviews
- It could also take a longer-term, more comprehensive perspective, for example:
 - Longer time period (e.g., look at the last 20 years)
 - Incorporate broader range of issues including climate resilience and integration of Local Knowledge, Traditional Knowledge, and Subsistence information, that have also been a focus of the Programmatic Evaluation process
- Only required by and limited to Groundfish FMPs
- Staff would prepare a work plan for this action for the Council to discuss during staff tasking (likely at the December 2025 meeting)



Summary: Possible directions, next steps, and opportunities for input





Additional Slides for Reference From April 2025 C4 Presentation



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

