Programmatic Evaluation Discussion Document

Draft for Council Review - 3/2/251

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1 Introduction

At its April 2025 meeting the Council is scheduled to discuss the Programmatic Evaluation and provide staff with additional direction to continue the development of this action. The action associated with the Programmatic Evaluation is to revise² 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 is to ensure

¹ Prepared by Katie Latanich, NPFMC staff, with contributions from other NPFMC and NMFS staff.

² While the Council's <u>June 2023 motion</u> 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 throughout this discussion document.

that the Council's policy guidance is comprehensive, can meet current and forthcoming challenges in the federal fisheries, and improves the Council's ecosystem-based management approach.³

The Council has expressed its preference to develop and analyze this revised, cross-FMP guidance through the preparation of an Environmental Impact Statement (PEIS) under the National Environmental Policy Act (NEPA). The NEPA process is further explained in Section 2.3.

In addition to a draft Purpose and Need Statement, the Council adopted the following alternatives for this action in June 2023.

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.

At the December 2024 Council meeting, staff proposed and the Council supported developing a draft set of cross-FMP goals and potential management objectives associated with Alternative 2 as a starting point for further discussion by the Council and public. Consistent with the Council's direction, Section 4.2 of this discussion document provides a draft set of 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.

Specifically, the Council action for April could include adopting a revised set of high level, cross-FMP goals as part of Alternative 2 that would enable staff to proceed with analysis. Staff are also suggesting minor changes to the Council's Purpose and Need Statement for this action.

In addition, the Council may want to consider and provide guidance on the content of management objectives that could accompany a set of revised goals. The Council does not need to develop detailed management objectives at this time. Management objectives could be informed by further Council discussion and public input. However, it would be helpful

³ This wording is adapted from the Council's Purpose and Need Statement D2 <u>Motion</u>, June 2023 and reflects revisions suggested in Section 2.1 of this document

for the Council to provide some direction on the range of management objectives to be included in the analysis.

Updating FMP policies, goals, and objectives would not result in immediate nor required changes to specific fisheries management measures. However, ways the Council could define Alternative 2 range from minor updates to more policy-forward changes that would provide stronger guidance to future Council actions. 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. A clearly defined set of alternatives is also necessary for National Marine Fisheries Service (NMFS) staff to determine the appropriate level of NEPA analysis for this action.

In Section 4.2 of this document, staff provide examples of two approaches the Council could take to develop management objectives that are consistent with a revised set of goals and would support Alternative 2.

Approach 2a: Planned initiatives - under this approach, the Council could consider management objectives that would explicitly reflect risk-averse and adaptive work that is planned or ongoing, and reinforce the Council's intent to continue such initiatives. Table 4.2 includes examples of potential management objectives based on recent Council discussions.

Approach 2b: More risk averse - under this approach, the Council could consider management objectives that reflect a stronger, more risk-averse approach to implementing one or more of the revised goals and achieving outcomes such as biological sustainability, community resilience, flexible and responsive management, Tribal and community access and engagement, and/or other goals.

2 Council action and discussion to date

Beginning in October 2022, the Council asked for information regarding a programmatic evaluation of its fisheries management policies, with specific reference to impacts of climate change on the marine ecosystems and the people who are dependent on those ecosystems.⁴ Additional steps in the early development of the Programmatic Evaluation, including by the Council's Ecosystem Committee, are described in previous discussion documents.⁵

2.1 Purpose and Need Statement including minor revisions

The Council adopted the following draft Purpose and Need Statement and alternatives for the Programmatic Evaluation in June 2023.⁶

Council and NMFS staff suggest the Council consider minor wording adjustments to the Purpose and Need Statement to clearly define the scope and intent of this action. Changes are shown in redline text.

- > Change the word "clarify" to "revise." This would more clearly describe the action under consideration.
- > Change the word "jurisdiction" to "authority." This would be more consistent with MSA language.
- > Add the word "goals" to the phrase "management policy and objectives." This provides a more thorough description of the components of the FMPs being revised.
- ➤ Use the phrase "policy guidance" in place of "management framework." This would focus the Purpose and Need Statement on the discrete action of updating policy guidance via revisions to management policies, goals, and objectives; rather than the Council's ongoing management of all Federal fisheries.

Purpose and Need Statement (redline version)

The federal action under consideration is to elarify 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 Council's policy guidance management framework of the Council is comprehensive, can meet current and forthcoming challenges in the federal fisheries, and and to describe and implement that framework in a comprehensive manner to improves 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

⁴ E Staff Tasking Motion, October 2022

⁵ See D3 February 2024 <u>Discussion Document</u> and D2 February 2023 PSEIS <u>Roadmap</u>

⁶ D2 Motion, June 2023

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.

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.

2.2 Impetus for updated FMP policy guidance

The exercise of revisiting management policies, goals, and objectives is "programmatic" in the sense that it provides the opportunity to reflect on all of the Council's current management programs and consider whether policy guidance is timely, relevant, and supports current and emerging challenges. The Council may find the process and outcome of updating cross-FMP guidance useful in the following ways. Additional cleanup and consistency tasks are described in more detail in Section 5.

- > Look ahead and recognize emerging challenges. In keeping with the Purpose and Need Statement, updated FMP guidance could explicitly recognize the challenges of climate change and non-stationarity, including climate related disturbances and changes to stock productivity and spatial distribution.
- Document practices for using best available science. Updated FMP guidance could provide a thorough and concise description of how the Council currently incorporates climate change information into the management process, as well as how the Council intends and aspires to broaden its understanding of best available science, and make use of new and emergent information and products.
- ➤ Communicate the Council's high-level values and priorities. FMP policies, goals, and objectives, like other Council policies, can describe the core values that are distinctive about the North Pacific Fishery Management Council's process. For example, the current Groundfish Management Approach (see Appendix 3A) emphasizes the high productivity of North Pacific ecosystems, the Council's precautionary and adaptive

⁷ https://www.npfmc.org/how-we-work/management-policies/

approach, and the Council's stewardship role in ensuring the sustainability of fishery resources and ecosystems for current and future generations.

- ➤ Provide transparency and rationale. FMP guidance can provide the Council and public with clear, transparent guidance that indicates how the Council intends to balance needs and user groups, and can be referenced by the Council and public in the future as support for or against a particular course of action.
- ➤ Guide and inform future Council actions. While FMP guidance would not be action forcing, it could enable the Council to identify areas of management programs that could be priorities for adjustments in the future, and consider follow-on actions that could be taken to implement new management policy, goals, and objectives. The Council could more closely reference each FMP's goals and objectives when taking future actions.
- ➤ Provide a template to evaluate progress. FMP guidance can provide a structure for the Council to communicate about the status of ongoing and completed work, and demonstrate how this work advances Council priorities. The Council uses the existing Groundfish FMP goals and objectives as a template for Groundfish Programmatic Workplan updates.⁸ Both the Groundfish and Salmon FMPs note that adaptive management requires regular review and updating of management objectives.⁹

2.3 NEPA analysis

NEPA requires Federal agencies to assess the environmental effects of proposed actions prior to making decisions. Due to the unique relationship of decision making between the Council and NMFS, analytical documents prepared in support of Council actions include NEPA review when applicable. NEPA review during the Council process allows for informed Council recommendations and public input well before final Agency decision. This process also aims to improve efficiency and reduce lag time between Council final action and the NMFS rulemaking process and Agency decision. In general, Council staff work with NMFS staff to determine the appropriate level of NEPA analysis once an action has been initiated by the Council (with a purpose and need and alternatives) and once there is enough structure to be able to assess potential impacts of the action on the human environment, usually at initial review development. Under NEPA, there are three levels of analysis, depending on the significance of the impacts of an action; a categorical exclusion, an environmental assessment (EA) or an environmental impact statement (EIS).

Updating and revising FMP policy language, in and of itself, is generally not an action that requires changes to fisheries management measures that could significantly impact the environment. Thus, while it will require an FMP amendment and Magnuson-Stevens Act analysis, this action may not *require* NEPA analysis in an EA or EIS. However, the Council has expressed interest in utilizing the NEPA process to understand the impacts of the action. **The Council could indicate whether its interest continues to be for this action to be analyzed**

⁸ For example see December 2024 E1 Groundfish Workplan update

⁹ See introduction to management objectives for both FMPs

through an EIS; otherwise, staff will work with NMFS to determine the appropriate analytical steps and level of NEPA review for this action once the Council provides more clarity about the scope of potential changes to FMP goals and objectives.

The Council initially considered undertaking a programmatic evaluation by reevaluating the existing 2004 Programmatic Groundfish Supplemental Environmental Impact Statement (PSEIS). However, the Council's current action is not linked to the 2004 PSEIS; this "Programmatic Evaluation" is a new action, not a revision of, an update to, nor tiered from, the 2004 PSEIS. The 2004 PSEIS was a discrete analysis prepared in response to a specific action. Due to the comprehensive nature of the 2004 PSEIS, it has often been incorporated by reference in analytical documents to describe ecosystem conditions and historical attributes of fisheries. Each Council action is reviewed for NEPA compliance; specific analyses and NEPA documents are prepared for each action as appropriate. Subsequent Council actions have not been tiered from the 2004 PSEIS. For recent actions, analysts relied on Ecosystem Status Reports (ESRs) and other documents to describe current ecosystem conditions to complement information from the 2004 PSEIS.

3 Developing a revised management policy, goals, and objectives

This section describes the process through which staff developed the set of revised (sometimes referred to as "strawman") goals, the information inputs that were considered, and future steps toward developing a complete set of revised goals and objectives.

The current FMP goals, objectives, and policies were drafted at different points in the Council's history; they are structured differently and reflect different points in the evolution of the MSA and National Standards and guidelines. As the Council has previously discussed, the Programmatic Evaluation aims to transition from the current FMP-specific management approach of goals and objectives to high-level guidance spanning all of the Council's FMPs (except for the Arctic FMP¹²). The Programmatic Evaluation process explicitly links and extends across all Council-managed fisheries the work-to-date on climate readiness, ecosystem-based management, and integration of diverse knowledge sources.

3.1 Policies, goals, and objectives in Council FMPs

The terms policies, goals, and objectives are used and structured differently across FMPs. Each FMP includes a section for management policy and objectives, with introductory text that recognizes the Magnuson-Stevens Act as the primary domestic legislation governing fisheries management and the necessity of conformance with the ten National Standards. The management policies, goals, and objectives of the Crab, Scallop, and Salmon FMPs include

¹⁰ See E Staff Tasking Motion, October 2022 and D2 Discussion Document: Roadmap for Reevaluating the Programmatic Groundfish Supplemental Environmental Impact Statement, February 2023.

¹¹ Alaska Groundfish Fisheries Programmatic Supplemental Environmental Impact Statement (2004) and Supplemental Information Report (2015) - full document available for download

¹² The Council chose to focus this Programmatic Evaluation on management of active fisheries; no fishery is currently authorized under the Arctic FMP.

fishery-specific references to current practices for coordinating with management partners and in the case of the Salmon FMP, a description of the Pacific Salmon Treaty.

Table 1: Structure of existing policies, goals, and objectives (text also provided in full in appendices)

Document	Structure and "ingredients"	
Groundfish FMP - includes both BSAI and GOA groundfish FMPs ¹³	 Management policy (this section in the FMP is titled "management approach" but describes the Council's policy for groundfish management) Goals Objectives, including intended future actions 	
Crab FMP	 Management goal Management objectives, descriptions, and considerations (suc as examples of social and economic information to be considered in the selection of management measures, and potential research topics) 	
Scallop FMP	 FMP objective Management goal Management objectives, descriptions, and considerations (as for Crab FMP above) 	
Salmon FMP	Management policyManagement objectives with descriptions	
Ecosystem Policy	 Value statement Vision statement Implementation strategy 	
Bering Sea FEP	 Ecosystem goals Process objectives Research objectives Ecosystem objectives 	

To support the Council's discussion of management policies, goals, and objectives it may be helpful to refer to working definitions that clarify how these layers or levels of guidance work together. This may help the Council and public reflect on what rises to the level of a cross-FMP goal, and the right level of specificity for a goal versus an objective.

¹³ Guidance for the BSAI and GOA Groundfish FMPs is the same with one exception; the BSAI Groundfish FMP includes an additional objective (Objective 22: Continue to improve the retention of groundfish where practicable, through establishment of minimum groundfish retention standards.)

Figure 1: Levels of policy guidance



The Council's climate resilience discussions to date have often focused on tactics and strategies the Council could use to improve climate resilience through management actions, procedural changes, and the incorporation of specific information inputs. The tasks for the Council's discussion in April 2025, as outlined in this discussion document, are encouraging the Council to take a step back to focus on the higher levels of guidance in this hierarchy. The ideas provided in Section 4 of this document are intended to help focus the Council's discussion at the level of goals and objectives.

As part of this discussion the Council can also consider the number of goals and objectives that will be meaningful and efficient for the purposes described in Section 2.2 including providing guidance and evaluating progress. There is not a "right" number of goals and objectives, and past guidance adopted by the Council has ranged from more concise (for example, the 7 objectives currently specified in the Crab, Scallop, and Salmon FMPs) to more detailed (the 9 goals and 45 objectives currently specified in the Groundfish FMPs).

3.2 Process and information inputs for developing revised goals

At the Council's December 2024 meeting, staff proposed¹⁴ and the Council supported¹⁵ ideas for materials to support the Council's April 2025 discussion of the Programmatic Evaluation. Ideas included providing draft language for revised goals and objectives, drawing on the Council's recent climate resilience discussions and work. The purpose of including draft language is to provide a concrete starting point for discussion, and enable the Council and public to provide specific feedback on the scope and interpretation of Alternative 2 and any potential revisions.

¹⁴ D1a staff <u>presentation</u>, December 2024

¹⁵ D1a motion, December 2024

In Section 4.2 of this document, staff have provided a set of example revised goals and examples of objectives that could be considered under Alternative 2. For brevity, this information is presented in table format (Table 2). Readers are strongly encouraged to review Appendix 1 for a more detailed explanation of the information and reasoning supporting these ideas.

The Council's intent¹⁶ has been to use the existing Groundfish FMPs goals and objectives as a starting point for developing cross-FMP guidance. The Groundfish FMPs provide the most detailed guidance, and are the only FMP policy guidance that has been comprehensively updated since the development of the FMPs following the establishment of the Council in 1976. However, the Council is not bound to this format. Each of the Council's existing FMPs include guidance, though the terms goals, objectives, policies, purpose, etc. are used and structured differently across FMPs. A comparison of this language is provided in the February 2024 discussion document¹⁷ as well as in Appendix 2 of this document.

The revised goals and example objectives provided in Section 4.2 of this document focus on illustrating Alternative 2 through supporting development and implementation of climate resiliency tools, incorporation of local and traditional knowledge, and tools for assessing and adapting to risk. As such, not all of the existing 45 Groundfish FMP objectives are pulled through yet, or updated in the table. Many that are not directly related to the focus of Alternative 2 may continue to be relevant and appropriate to carry forward, including those that directly reference the Council's authority and responsibilities under the MSA and National Standards. Staff can identify these objectives as part of the draft analysis, and the Council can consider whether and how these should continue to be included.

The revised goals in Section 4.2 are based on the original nine goals included in the Groundfish FMPs, and err on the side of retaining this language unless there is a clear reason to consider updating or revise them. The revised goals in Section 4.2 are based on the following considerations.

3.2.1 New ideas from the Council climate resilience planning and NMFS climate science products

Over the past several years, the Council invested substantially in climate resilience planning, in response to evidence of rapid environmental change in the region, and significant impacts on Council-managed fisheries. NMFS has engaged in parallel efforts to develop information and products to support climate-informed management advice including through the NOAA Climate, Ecosystem, and Fisheries Initiative (CEFI). This work is ongoing. The products, ideas, recommendations, and themes of discussion generated through this body of work are the primary source of ideas for revised goals and examples of management objectives. Resources include:

¹⁶ See D2 motion, February 2023

¹⁷ D3 Programmatic Evaluation <u>Discussion Paper</u>, February 2024; Section 4: Comparison of FMP goals, objectives, and policies

- Work and products of the Bering Sea FEP Climate Change Task Force, including the Climate Readiness Synthesis¹⁸ and Final Report¹⁹
- The Council's Climate Resilience Work Plan (in progress)²⁰
- Discussions and the final report²¹ from the June 2024 Climate Scenarios Workshop
- Final report²² from the April 2023 SSC workshop on rapid change in the northern Bering and southern Chukchi seas
- NMFS Alaska Fisheries Science Center products and collaborations including the December 2024 Climate Report,²³ Climate, Ecosystems, and Fisheries Initiative (CEFI) and pilot projects including the Alaska Climate Integrated Modeling project (ACLIM) and the Gulf of Alaska Integrated Modeling project (GOACLIM)

3.2.2 Consistency with the National Standards

The Council's existing FMP goals and objectives are grounded in and consistent with the 10 Magnuson-Stevens Act National Standards (although not every National Standard has a corresponding FMP goal or objective).²⁴ The revised set of goals continues to reinforce the language of the National Standards in describing the Council's core responsibilities; for example, avoiding overfishing.

3.2.3 Opportunities for improving consistency across FMPs

The Council's Purpose and Need Statement for the Programmatic Evaluation states the Council's intent to clarify (Section 2.1 suggests changing this to "revise") the management policy and objectives for all federal fisheries under the Council's jurisdiction, and to describe and implement the Council's management policies in a comprehensive manner. Staff have interpreted this as the Council's intent to develop a single, shared management policy and a set of goals and objectives that would apply across all of the Council's FMPs (excluding the Arctic FMP) and replace or supplement existing guidance for the Crab, Scallop, and Salmon FMPs. The revised set of goals reflects opportunities to provide more consistency across FMPs. For example, not all FMPs currently include a goal or objective related to ecosystem health; therefore, adding a cross-FMP goal related to ecosystem health would be an opportunity to improve consistency across FMPs.

The Purpose and Need Statement states that this action would apply to "...all federal fisheries managed under the Magnuson-Stevens Act and the Halibut Act under the jurisdiction²⁵ of the North Pacific Fishery Management Council." The Council does not have a formal policy guidance for its management of the halibut fishery except for the specific goals and objectives of

¹⁸ Climate Readiness Synthesis. Prepared by the NPFMC Climate Change Task Force 2022

¹⁹ D1b Climate Change Task Force Final Report, December 2024

²⁰ D1b motion, December 2024

²¹ Climate Scenarios Workshop Report

²² D1 SSC Workshop Report, April 2023

²³ D1 AFSC Climate Report, December 2024

²⁴ The Groundfish and Scallop FMP goals and objectives explicitly state that they are in conformance with the National Standards; Crab and Salmon FMPs do not.

²⁵ Section 2.1 suggests changing the term "jurisdiction" to "authority"

the Sablefish and Halibut IFQ Program²⁶. However, the Council has previously indicated that its ecosystem-based fishery management approach to groundfish fishery management also applies to consideration of Alaska halibut fishery management recommendations within the Council's authority.

3.2.4 Consistency with and integration of the Council's 2014 Ecosystem Policy and other Council guidance and values

In addition to FMP goals and objectives, the Council has adopted other forms of guidance, including the 2014 Ecosystem Policy (Appendix 4A) and the goals and objectives of the Bering Sea FEP (Appendix 4B), that help communicate the Council's values and approach for implementing ecosystem-based management. This guidance complements the intent to improve the Council's ecosystem-based management approach, as described in the Purpose and Need Statement for this action. The revised set of goals provided in Section 4.2 complement and is consistent with this guidance.

3.2.5 Consistency with the Council's Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol

The LKTKS Protocol²⁷ developed by the LKTKS Task Force as a module under the Bering Sea FEP was approved by the Council in October 2023 and provides guidance for identifying, analyzing, and incorporating LKTKS information into the Council process. The Taskforce also identified onramp recommendations for the Council's consideration at final action that identified potential changes to the Council's process to better incorporate these knowledge systems. While the Protocol and the work of the LKTKS Task Force charged with the Protocol's development were not specifically focused on climate change, diverse knowledge systems are a vital component of climate readiness and adaptation. The Protocol is specific to the Bering Sea region though it could be more widely relevant to Council and agency staff, Council advisory bodies, and the public.

The document identifies eight guidelines for identifying, analyzing, and incorporating LKTKS into Council processes, and also provides best practices for engaging and working with these knowledge systems and expertise. The information in the Protocol and the Council's motion²⁸ (also see Appendix 5) approving the document and its guidance are relevant to multiple goals in Section 4.2, including supporting Tribal and community access and engagement (Goal 8), using best available science (Goal 9), and supporting an open, transparent, and inclusive public process (Goal 10).

Goals and objectives for the Sablefish and Halibut Individual Fishing Quota Program can be found in Section 1.1.2 of the recent Program Review, D5 December 2024. These objectives are specific to the IFQ program, though Objective 10 is to "Achieve previously stated Council goals and objectives and meet MSA requirements."
 Protocol for Identifying, Analyzing, and Incorporating Local Knowledge, Traditional Knowledge, and Subsistence Information into the North Pacific Fishery Management Council's Decision-making Process. D1 October 2023
 D1 Council Motion October 2023

3.2.6 Other ideas discussed by the Council and SSC

Previous discussion papers²⁹ identified additional ideas that have been raised at the SSC and Council that could be folded into the programmatic evaluation. These 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) into Council processes
- 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-managed fisheries.

3.2.7 Consistency with NMFS guidance

Revised goals and objectives must be compatible and consistent with the Magnuson-Stevens Act and the National Standards, and with relevant Agency Policies and Procedures.

3.3 Themes of a revised cross-FMP management policy

The Groundfish FMPs currently include a management policy (See "Management Approach" in Appendix 3A) that communicates the Council's responsibilities, priorities, and values for groundfish management. Alternative 2 for this action includes developing a more adaptive ecosystem-based management policy, in addition to goals and objectives, which suggests the Council intends to review and potentially revise this overarching management policy to apply to all FMPs and communicate the intent of Alternative 2.

Examples of themes from the **existing** Groundfish FMPs management policy that could be integrated into a revised cross-FMP management policy include:

- Balancing fishery benefits and participation with long term sustainability of fisheries and ecosystems
- Requirements, such as conformance with the Magnuson-Stevens Act, National Standards, and other applicable laws, and use of best available science
- Balancing goals and the interests of multiple user groups
- Adoption of adaptive, precautionary, ecosystem-based management principles
- Commitment to an open and transparent public process

Examples of themes that could be added or more strongly emphasized in a **revised** management policy, based on the Purpose and Need Statement for this action, include:

²⁹ D3 February 2024 <u>Discussion Document</u>

- Strengthening the focus on adaptive, ecosystem-based management
- Explicitly recognizing challenges of climate change and nonstationarity, recognizing current and future climate-related impacts to fisheries and ecosystems, and adapting to risk in the face of additional uncertainty
- Identifying management priorities and values for coping with a changing environment, including adaptable, responsive management
- Explicitly identifying climate science and LKTKS as components of best available science
- Recognizing Alaska tribes and communities that rely on subsistence resources

Staff suggest developing and refining a cross-FMP policy at a later point in the process, after further discussion of revised goals and objectives under Alternative 2. Through this process the Council may identify additional themes and language it wishes to emphasize in an overarching management policy.

4 Examples of potential revised goals

4.1 Structure of revised goals and objectives

A summary table (Table 2) of revised cross-FMP goals and objectives is provided in Section 4.2, and a more detailed explanation of these revisions is provided as Appendix 1 to this document. **Readers are strongly encouraged to reference Appendix 1**, which includes more background on why revisions are proposed, how these changes promote consistency across FMPs and with the National Standards, and provides references to identify where these proposed changes have been discussed in the Council process (for example, Climate Scenarios Workshop and report).

It is important to emphasize that the ideas in this table reflect ideas provided by the Council and public, Council and NMFS' climate resilience planning and work products, and themes of discussion from the June 2024 Climate Scenarios Workshop. These ideas are not meant to be comprehensive. They are provided as examples and a starting point for further discussion by the Council and public. Also important to note is that the addition of revised, cross-FMP goals and objectives could *add* to (not replace) the body of policy guidance the Council intends to consider, in addition to continuing to conform with the Magnuson-Stevens Act and National Standards and other applicable laws as required.

The revised goals and objectives are structured as follows. Alternatives 1 and 2 describe a spectrum of risk aversion, from status quo to more highly risk averse.

Alternative 1 is the status quo. Under this alternative, the Council would retain the existing, separate guidance for each of the Council's FMPs for Groundfish, Crab, Scallop, and Salmon. This is the least prescriptive alternative the Council is considering with respect to risk, although the status quo is still considered an ecosystem-based approach and the Groundfish FMP policy describes a precautionary management approach. The status quo FMP guidance does not fully reflect current Council initiatives or recognize climate-related risks and challenges.

Alternative 2 would adopt a more adaptive ecosystem-based management policy, goals and objectives that would apply to all Council-managed fisheries. Table 2 includes several columns to help illustrate what Alternative 2 could look like.

- > Current Groundfish FMPs Goal includes the current set of Groundfish FMPs goals.
- ➤ Revised Cross-FMP Goal includes suggestions for revising each of the current Groundfish FMPs goals to meet the intent of Alternative 2 and provide consistency across FMPs.

More substantial wording changes are proposed for the following goals and themes:

- 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
- Table 4.2 also includes a newly added Goal 10 Council process

No changes suggested:

- Goal 4 Bycatch
- Goal 5 Seabirds and marine mammals
- Goal 6 Habitat
- ➤ Example objectives: Approach 2a includes examples of ideas for new management objectives that could be added to implement the revised goals. These examples largely reflect work that is planned or ongoing, and again are based on ideas identified by the Council and public. This is a more risk averse approach than Alternative 1, as it explicitly captures new information and understanding of climate related risks and challenges, and steps the Council is actively taking or considering in response.
- ➤ Example objectives: Approach 2b also includes examples for new objectives, and considers how the Council could take a stronger, more risk-averse approach to implementing one or more of the revised goals and achieving outcomes such as biological sustainability, community resilience, flexible and responsive management, supporting Tribal and community access and engagement, and/or others.

The column for Approach 2b includes some examples of objectives but is not fully populated. Staff are looking for additional guidance on if and where the Council would like to add examples of more risk-averse objectives and/or would like to request input from the public.

4.2 Example of revised goals and potential objectives

Table 2 provides a summary of examples of revised cross-FMP goals and objectives for implementing Alternative 2. See Appendix 1 for additional explanation.

Important reminders for interpreting this table

- The Council action for April is focused on goal statements. The Council action for April could include adopting a revised set of high level, cross-FMP goals. The Council may want to consider and provide guidance on the content of management objectives that could accompany a set of revised goals, and whether these would look more like Approach 2a or 2b, but does not need to develop detailed management objectives at this time.
- All examples are provided as a starting point for discussion. The ideas in this table
 are provided as a starting point for discussion, consistent with the Council's direction to
 staff. They are not meant to be comprehensive and the Council and public may have
 other ideas and preferences for the wording and content of goals and objectives.
- This table focuses on new objectives and is not comprehensive. The example objectives provided in this table focus on ideas for supporting development and implementation of climate resiliency tools, incorporation of local and traditional knowledge, and tools for assessing and adapting to risk. Not all of the existing 45 Groundfish FMPs objectives are pulled through yet, or updated in the table. The carrythrough of existing FMPs objectives would be addressed at a later step in this process.
- The alternatives and approaches in the table describe a spectrum of risk aversion.

 Alternatives 1 and 2, and approaches 2a and 2b, describe a spectrum of risk aversion.
 - Alternative 1: Status quo ecosystem-based approach
 - Alternative 2, Approach 2a: More risk-averse; reflects new information and understanding of climate related risks and challenges, documents current Council practices, and steps the Council is actively taking or considering in response
 - Alternative 2, Approach 2b: Most risk-averse approach; reflects where Council
 has expressed interest but has not yet committed or made progress. Ideas in this
 column are limited to those that have already been raised in discussion; Council
 and public may have other ideas of what a more precautionary, risk averse
 approach could look like.

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.	 Develop and review harvest policies that consider and are responsive to climate-driven uncertainty and risks Consider climate information in rebuilding plans 	Adopt a more precautionary approach to mitigate and buffer against climate impacts
2 - Social and economic benefits; communities	Promote sustainable fisheries and communities	Promote the sustainability of fisheries and communities that depend on resources affected by fisheries.	 Understand, prepare for, and mitigate social and economic impacts of climate change to the extent practicable Consider the impacts of fishery management actions to commercial, Tribal, subsistence, and recreational participants and communities, including harvesting and processing sectors Improve understanding of factors that influence vulnerability of people, communities, and infrastructure to climate change impacts Build capacity to consider market and economic factors Develop and implement procedures for incorporating and reviewing economic and socioeconomic information as part of TAC setting 	 Balance socioeconomic stability with the need for management flexibility amid changing environmental conditions Explicitly consider the impacts of fishery management actions to Alaska Tribes and communities that rely on subsistence resources
3 - Ecosystems	Preserve food web	Maintain healthy, productive, biodiverse, and resilient marine ecosystems that support sustainable fisheries and a range of services and users	Continue incorporating ecosystem-based considerations into fishery management (existing Groundfish Objective 13) Continue to improve processes for synthesizing climate and ecosystem information, and communicating climate and ecosystem-related risks	Identify potential risks from other ocean uses and sectors, as well as opportunities for communication and coordination

	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
			and vulnerabilities, and integrating information into Council processes Continue and expand use of Fishery Ecosystem Plans to ensure FMP management takes ecosystem context into account	
4 - Bycatch	Manage incidental catch and reduce bycatch and waste	NO CHANGE	 Recognize and plan for climate-driven species distributions shifts and impacts to bycatch management measures Support industry, community, and technology-based approaches for information sharing and bycatch management Reduce regulatory discards and increase retention and utilization 	
5 - Seabirds and marine mammals	Reduce and avoid impacts to seabirds and marine mammals	NO CHANGE	Continue to support Agency co-management of marine mammals where appropriate	
6 - Habitat	Reduce and avoid impacts to habitat	NO CHANGE	 Improve understanding of gear impacts on habitat, and as appropriate, mitigate adverse impacts to the extent practicable Consider past and anticipated climate change impacts to Essential Fish Habitat Review the effectiveness of habitat protection measures under changing conditions 	Encourage avoidance of non-fishery impacts to EFH through EFH consultation authority

	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
7 - Management measures	Promote equitable and efficient use of fishery resources	Promote flexible, responsive management measures that enable adaptation to changing conditions	 Improve capacity and procedural mechanisms to support timely response to early warnings and signals of change Comprehensively plan for and review the effectiveness of spatial management measures under changing conditions Support the adaptive capacity of people and communities by identifying barriers and solutions to enable diversification and flexibility Support community and industry-led approaches that can promote innovation and flexibility 	Consider "if-then" mechanisms for automating climate-informed management responses Proactively plan for shifting and emerging fisheries Develop capacity to support flexible and responsive management tools including dynamic and in-season management Systematically consider and develop metrics to evaluate climate resilience in management measures
8 - Tribal and community access and engagement	Increase Alaska Native and community consultation	Support Tribal and community access and engagement	Identify and support solutions for overcoming barriers to participation in the Council process Recognize and follow best practices and guidelines for engaging with LKTKS knowledge systems and expertise Recognize the importance of cultural values and practices, subsistence access and food security Note: LKTKS is also addressed under 9 - Best available science, and representation and participation are addressed under 10 - Council process	Plan for increasing interactions with Arctic communities

	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
9 - Best available science	Improve data quality, monitoring, and enforcement	Use best available science that draws on the full range of available sources	 Continue to improve data quality and integrity, including through, monitoring and enforcement. Evaluate management tools and options focused on the inclusion of existing and emergent climate information Develop capacity to evaluate tradeoffs and management options Implement the LKTKS Protocol and onramps and continue developing approaches to systematically consider LKTKS in Council processes. Fully leverage existing information sources, and support investment in baseline data collection, including research surveys, to support existing and emerging needs 	 Improve capacity to identify early warnings and signals of change Develop capacity to consider climate-related vulnerabilities, risks, and uncertainties Support development of onramps and opportunities for collaboration, information sharing, and co-production of knowledge
10 - Council process (added) Note, the Council could consider whether this should be a separate goal, or combined with Goal 8	NA	Support an open, transparent, and inclusive public process	 Support inclusive and equitable processes, collaborations, and partnerships that facilitate incorporation of multiple knowledge systems into climate planning and response Provide clear, concise, and accessible information to the extent practicable Support diverse representation on Council advisory bodies and in other Council processes 	

5 Next steps for the Council

Summary of potential planning and steps

Development of a revised management policy, goals, and objectives will be an iterative process.

April 2025: Council action necessary for continued progress on this action:

- Minor revisions to Purpose and Need Statement
- Adopt a set of goals for further analysis
- Provide direction on objectives for Alternative 2

Later steps: Future discussions

- Refine and finalize wording of goals and objectives
- Develop and approve policy statement
- Further discussion of key questions (e.g., to what extent does the Council wish to reinforce the National Standards?; defining terms such as precautionary and risk averse)
- Carryover and cleanup of existing FMP guidance (determine what elements of existing FMP guidance should be carried forward into a new policy, goals, and objectives)

Short term next steps: April 2025

At the April 2025 meeting it would be helpful for the Council to discuss the following topics and provide direction to staff on how to proceed.

- 1. Review and potentially adopt the suggested wording adjustments to the Purpose and Need Statement for this action (Section 2.1).
- 2. Discuss the revised cross-FMP goals provided in this document (Section 4.2), discuss any revisions or additions the Council would like to make to align these goals within the intent of Alternative 2, and potentially adopt a set of goals for further analysis. If the Council has a strong preference on whether any of the revised goals should be omitted or changed (and how), or whether there are important goals missing from this list, it would be helpful to voice those preferences at this time.
- 3. Discuss potential management objectives that could support the implementation of revised cross-FMP goals. The Council does not need to approve or agree on the specific wording of management objectives at this time. However, it would be helpful to staff and the public for the Council to indicate whether it is interested to proceed with analyzing an interpretation of Alternative 2 that is more like Approach 2a, with management objectives that would be largely based on planned and ongoing climate resilience work, or more like Approach 2b, with management objectives that could be more policy-forward and risk averse with regard to one or more goals, or both approaches (see Section 4.1). If the Council is interested in further analysis of an option like Approach 2b, it would be helpful to provide specific examples of what more

risk-averse management objectives could look like. The Council could choose to explore both approaches, as well as add to or modify the existing two alternatives.

Development of a revised management policy, goals, and objectives will be an iterative process. Providing direction to staff will provide necessary clarification to keep this action moving forward, enable staff to proceed with analysis, and enable the public to provide informed input. The Council retains flexibility to make changes to the alternatives and draft management policy language, goals, and objectives at any point prior to Council final action based on further discussion and input from the public and Tribes.

Longer term next steps: Late 2025 and beyond

Developing a revised management policy, goals, and objectives will be an iterative approach. If the Council provides guidance as described above, staff would begin developing a draft analysis for initial review while coordinating with NMFS staff to assess the appropriate level of NEPA analysis. The Council would tentatively receive an update and potentially a NEPA scoping report, depending on whether an EIS will be prepared, in October 2025 at the earliest. Staff could provide an update on the analytical approach and structure of a draft initial review document at this time, though would not yet share a complete draft. This interim step would provide the Council with an opportunity to consider public input, make further adjustments to draft goals and objectives, and provide any further guidance to staff on the analytical approach to the document.

Staff would plan to share a first draft analysis in the first half of 2026. At that time, staff will be able to bring forward language and considerations for a policy statement and specific objectives for Council and public input. Additionally, staff will provide discussion of any issues to resolve about how the cross-FMP policy guidance relates to individual FMPs. The following illustrates some of these issues.

Further discussion of key terms and concepts

There are different perspectives on the meaning of key concepts including "precautionary" and "risk averse" underlying the Council's management policy, goals, and objectives. The Council may want to define the intended meaning of these terms in the specific context of the Council process.

References to the National Standards

Many of the existing FMP goals and objectives restate requirements and/or language included in the Magnuson-Stevens Act and National Standards, although not every National Standard has a corresponding FMP goal or objective. For example, all FMPs reference biological sustainability (National Standard 1), best scientific information available (National Standard 2), sustained participation of fishing communities (National Standard 8) and safety at sea (National Standard 10). The Council has previously expressed its interest in maintaining a strong link between the National Standards and FMP guidance, and there are multiple ways this could be achieved through a revised management policy, goals, and objectives. The Council can revisit

this at a later point in the analytical process when its management policy, goals, and objectives are more fully developed.

Cleanup of existing Groundfish FMP objectives: The existing 45 Groundfish FMPs objectives adopted in 2004 include some objectives that may be considered achieved, outdated, or no longer relevant. Staff can identify these objectives as part of the draft analysis, and provide supporting information for the Council to determine whether they should continue to be included. The Council can also consider whether and how to document objectives that have been accomplished, to maintain a record of progress and note their continued importance.

- Example: Objective 39 Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program. The Council may consider this objective achieved, as restructuring of the Observer Program was achieved through previous amendments to the Groundfish FMPs in 2013.³⁰
- Example: Objective 28 Develop a Marine Protected Area policy in coordination with national and state policies. The Council may consider this objective outdated, as it reflects Federal administration and state policy priorities at the time the 2004 PSEIS was developed.³¹

Carryover of other FMP management policies, goals, and objectives: Guidance for the Crab, Scallop, and Salmon FMPs is structured differently than for the Groundfish FMPs, reflecting differences in the life history and management context of these fisheries. These similarities and differences are described in more detail in a previous discussion document.³² The Council may wish to retain or carry forward some of this existing FMP-specific guidance and context, along with adopting cross-FMP guidance. Staff can provide more context for the Council to determine whether and how FMP-specific information could continue to be included to supplement a cross-FMP set of goals and objectives.

- ➤ Example: The Crab and Scallop FMPs include the goal of minimizing gear conflicts among fisheries.
- ➤ Example: The Crab, Scallop, and Salmon FMPs refer to co-management responsibilities with the State of Alaska.
- ➤ Example: The Salmon FMP includes *Objective 5 Protect wild stocks and fully utilize hatchery production*

³⁰ See <u>Amendment 86</u> to the Fishery Management Plan for Groundfish of the BSAI and <u>Amendment 76</u> to the Fishery Management Plan for Groundfish of the GOA

³¹ Including Executive Order <u>13158</u>; ADFG <u>work</u> in 2001-2002 to develop an MPA policy and process

³² D3 Programmatic Policy Evaluation <u>Discussion Paper</u>, February 2024

Appendix 1: Discussion of revised FMP goals and potential objectives

This appendix provides a more detailed explanation of the suggested revised goals in Table 2 in Section 4.2, and discusses opportunities for these revisions to support Alternative 2, provide greater consistency across FMPs, reinforce the National Standards, and complement other existing Council guidance including the Council's Ecosystem Policy and Bering Sea FEP goals and objectives. More information is also provided in the tables in Appendix 2, which provide a side-by-side comparison of the topics and wording of policies, goals, and objectives.

This appendix also complements Table 2 in Section 4.2, which provides examples of management objectives that could accompany revised cross-FMP goals, by indicating where these ideas have been discussed in the Council process. These sources and their abbreviations include the following.

- Climate Scenarios Workshop (CSW) Final Report
- Climate Change Task Force (CCTF) Final Report
- Climate Resilience Workplan (note that at present this is referring to the Council's December 2024 motion to establish a Climate Resilience Workplan based on recommendations from the CCTF Final Report; this Workplan will be presented to the Council at a later time)
- Climate Readiness Synthesis (CRS)
- SSC Workshop (referring to final report from the April 2023 SSC workshop on rapid change in the northern Bering and southern Chukchi seas)

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.

Explanation of suggestions

Biological sustainability is already a consistent theme of goals and objectives across all FMPs and developing a cross-FMP goal on this theme would not be a change from existing guidance. All 4 FMPs include a goal or objective related to biological sustainability and grounded in National Standard 1. The Ecosystem Policy and Bering Sea FEP goals and objectives also refer to biological sustainability and long-term stewardship.

Revisions to this goal could improve cross-FMP consistency and illustrate the intent of Alternative 2 in the following ways.

- Include the phrase "optimum yield." The Groundfish, Scallop, and Salmon FMPs (though not crab) refer to optimum yield and optimizing yield, though at different levels of guidance. Adding the term optimum yield to a cross-FMP goal would be consistent with National Standard 1 and could reinforce that the meaning of "optimum" involves a balance of uses and objectives, and reduces harvest from the maximum sustainable yield from a fishery to take into account other economic, social, or ecological factors, particularly in a changing environment.
- Include the phrase "long-term." Adding the phrase long-term is consistent with the wording of the current Crab and Scallop FMP sustainability objectives. This would also be consistent with the current Groundfish FMP management policy and the Ecosystem Policy Value Statement (Appendices 3A and 4A, respectively) which both recognize the Council's responsibility to provide sustainable resource stewardship to benefit current and future generations. Including this phrase (in addition to "avoiding overfishing") could also reflect that fishing mortality is not the only factor influencing biological sustainability.

Additional ideas

The Council could also consider the following topics when developing more specific objectives to support a cross-FMP goal related to biological sustainability.

Approach 2a (examples of objectives based on existing or planned initiatives)

- Develop and review harvest policies that consider and are responsive to climate-driven uncertainty and risks (CSW, CCTF report, SSC workshop, IRA objective)
- Consider climate information in rebuilding plans (CCTF report)

Approach 2b (examples of objectives that could be adopted under a more risk averse approach)

 Adopt a more precautionary approach to mitigate and buffer against climate impacts (CSW 3.8)

2 Social and economic benefits; communities

Current Groundfish FMP goal: Promote sustainable fisheries and communities

Example (revised) cross-FMP goal: Promote the sustainability of fisheries and communities that depend on resources affected by fisheries

Explanation of suggestions

Social and economic benefits and community sustainability are already a consistent theme of goals and objectives across all FMPs and developing a cross-FMP goal on this theme would not be a change from existing guidance.

Developing a cross-FMP goal related to communities and social and economic benefits would be an opportunity to improve consistency across FMPs and would also be consistent with National Standard 8. All of the Council's FMPs currently include a goal or objective(s) on this topic although the focus, wording, and grounding in the National Standards vary. For example, the Groundfish FMP goal and objectives reference and incorporate language from multiple National Standards (National Standards 1, 4, 5, 8, 9) while the other FMPs do not. All FMP goals and objectives refer to stability, and the Crab and Scallop FMPs focus on defining and identifying information that could be used to characterize social and economic benefits.

A cross-FMP goal could acknowledge values that are shared across FMPs, while recognizing that specific social, economic, and community objectives are embedded within many of the Council's species and FMP-specific management programs (for example, the BSAI Crab Rationalization Program). This goal would also be consistent with the Council's Ecosystem Policy and the goals and objectives of the Bering Sea FEP.

Revisions to this goal could improve cross-FMP consistency and illustrate the intent of Alternative 2 in the following ways.

➤ Add the phrase "communities that depend on resources affected by fisheries." This phrase acknowledges the wide range of communities³³ that are engaged in or impacted by Federally managed fisheries. This is consistent with the intent of Alternative 2 to "recognize Alaska tribes and communities that rely on subsistence resources."

Additional ideas

The Council could also consider the following topics when developing more specific objectives to support a cross-FMP goal related to social and economic benefits and communities.

Approach 2a (examples of objectives based on existing or planned initiatives)

- Understand, prepare for, and mitigate social and economic impacts of climate change to the extent practicable (CSW 5.2)
- Consider the impacts of fishery management actions to commercial, Tribal, subsistence, and recreational participants and communities, including harvesting and processing sectors (CSW; also consistent with existing FMP guidance)
- Improve understanding of factors that influence vulnerability of people, communities, and infrastructure to climate change impacts. (CSW 5.2)
- Build capacity to consider market and economic factors (CSW 5.2 and 4.2)

³³ The following definition of "community" was provided for the Climate Scenarios Workshop: The workshop scenarios and discussions use the term "community" in an inclusive way to accommodate the many ways people experience and understand community. Community can rest in a place, may include social networks on which people interact and rely, and can overlap. For this workshop, community refers to a group that feels connected to one another in specific ways. The term can refer to any of the following: Community of place - a group of people that are connected to a geographic place through where they live, work, or spend meaningful time; Community of practice - a group of people that share a common practice, vocation, or Occupation; and Communities of interest - a group of people that share a common social or economic interest or concern or activity. Excerpted from Climate Scenarios Workshop Frequently Used Acronyms and Terms, June 2024.

 Develop and implement procedures for incorporating and reviewing economic and socioeconomic information as part of TAC setting (IRA funding objective 3)

Approach 2b (examples of objectives that could be adopted under a more risk averse approach)

- Balance socioeconomic stability with the need for management flexibility amid changing environmental conditions (CSW 3.1)
- Explicitly consider the impacts of fishery management actions to Alaska Tribes and communities that rely on subsistence resources. (Purpose and Need Statement, CSW 2)

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.

Explanation of suggestions

Developing a cross-FMP goal related to ecosystem health would directly address the intent of Alternative 2 to adopt a more adaptive ecosystem-based management policy and objectives, and would be an opportunity to improve consistency across FMPs. The Groundfish FMPs include a goal and objectives related to ecosystem health, while the Crab, Scallop, and Salmon FMPs do not. A cross-FMP goal related to ecosystem health would also be consistent with the Council's Ecosystem Policy and with the goals and objectives of the Bering Sea FMP.

Revisions to this goal could improve cross-FMP consistency and illustrate the intent of Alternative 2 in the following ways.

- > Include the updated term "ecosystem" in place of "food web." This wording update is consistent with the Council's other ecosystem-related guidance.
- ➤ Link healthy ecosystems with desired outcomes, including biological sustainability and benefits to user groups. The suggested rewording of this goal is adapted from the Council's Ecosystem Policy Vision Statement, and links ecosystem health with desired outcomes including biological sustainability and resilience. The reference to services and uses also more clearly recognizes people and fishing activity as a part of marine ecosystems. The reference to resilience recognizes that supporting ecosystem productivity and function can help mitigate and buffer against the impacts of climate change and support recovery from climate shocks, a theme of discussion at the CSW.

Additional ideas

The Council could also consider the following topics when developing more specific objectives to support a cross-FMP goal related to ecosystem health.

Some topics that are already captured in the existing Groundfish FMP objectives were also an emphasis of recent climate discussions and would likely be a priority to carry forward, such as Groundfish Objective 13 - incorporate ecosystem-based considerations into fishery management decisions. Discussions at the CSW emphasized continuing to articulate what ecosystem-based approaches look like in practice and identifying incremental steps forward.

It is important to note the overarching intent of Alternative 2 is to adopt a more adaptive ecosystem-based management policy and objectives. The intent of supporting healthy, productive ecosystems would be an underlying principle of *all* goals and objectives under Alternative 2. Some broad topics would be consistent with the goal of ecosystem health, but may be more appropriate to address under other goals because they can support multiple aspects of Council management. For example, this document suggests that improving uptake of existing and emergent ecosystem information, and using diverse information sources including LKTKS, could be captured under the goal of using best available scientific information (see Goal 9).

The Council could also consider the following topics when developing more specific objectives to support a cross-FMP goal related to ecosystem health.

Approach 2a (examples of objectives based on existing or planned initiatives)

- Continue incorporating ecosystem-based considerations into fishery management actions (existing Groundfish Objective 13).
- Continue to improve processes for synthesizing climate and ecosystem information, and communicating climate and ecosystem-related risks and vulnerabilities, and integrating information into Council processes. (CSW 5.3)
- Continue and expand use of Fishery Ecosystem Plans to ensure FMP management takes ecosystem context into account

Approach 2b (examples of objectives that could be adopted under a more risk averse approach)

 Identify potential risks from other ocean uses and sectors, as well as opportunities for communication and coordination (CSW 4.5 and 4.6, CCTF Final Report)

4 Bycatch

Current Groundfish FMP goal: Manage incidental catch and reduce bycatch and waste

Example (revised) cross-FMP goal: NO CHANGE

Explanation of suggestions

No changes are suggested to the wording of this goal. As currently worded, this goal could be adopted as a cross-FMP goal in support of Alternative 2.

Adding a cross-FMP goal related to bycatch could be an opportunity to improve consistency across the Council's FMPs. Avoiding and reducing bycatch is a goal of the Groundfish FMPs and an objective of the Salmon FMP, and grounded in National Standard 9. The Crab and Scallop FMPs do not include dedicated objectives focused on bycatch, although incidental catch and bycatch are referenced in the description of the biological sustainability objectives for the Crab and Scallop FMPs, respectively. The wording varies, including the action (reduce, manage, minimize, maintain) as do the the terms (bycatch, incidental catch, prohibited species catch, noncommercial catch, and waste). Bycatch is also referenced in the Bering Sea FEP goals and objectives though not in the Ecosystem Policy.

Additional ideas

Recent discussions, including the Climate Scenarios Workshop, have emphasized that climate change could create or exacerbate bycatch management challenges, and could also drive innovation and improved flexibility. The Council could consider the following ideas when developing more specific objectives for implementing a cross-FMP goal focusing on bycatch. Some topics would be consistent with the goal of habitat conservation, but may be more appropriate to address under other goals because they can support multiple aspects of Council management. These topics include uptake of climate science (addressed under Goal 9 - Best available science) and use of spatial management measures (addressed under Goal 7 - Management measures).

Approach 2a (examples of objectives based on existing or planned initiatives)

- Recognize and plan for climate-driven species distributions shifts and impacts to bycatch management measures (CSW 3.4, CCTF Final Report)
- Support industry, community, and technology-based approaches for information sharing and bycatch management (CSW 3.4)
- Reduce regulatory discards and increase retention and utilization (CSW 3.4; current BSAI Groundfish Objective 22)

5 Seabirds and marine mammals

Current Groundfish FMP goal: Reduce and avoid impacts to seabirds and marine mammals

Example (revised) cross-FMP goal: NO CHANGE

Explanation of suggestions

No changes are suggested to the wording of this goal. As currently worded, this goal could be adopted as a cross-FMP goal in support of Alternative 2.

Developing a cross-FMP goal related to interactions with seabirds and marine mammals would be an opportunity to improve consistency across FMPs. The Groundfish FMPs include a goal and objectives related to reducing and avoiding impacts with seabirds and marine mammals, while the Crab, Scallop, and Salmon FMPs do not. A cross-FMP goal related to seabirds and marine mammals would also be consistent with the Council's Ecosystem Policy and with the goals and objectives of the Bering Sea FEP.

Additional ideas

Approach 2a (examples of objectives based on existing or planned initiatives)

Continue to support Agency co-management of marine mammals where appropriate
 (Discussions at the CSW highlighted the value of co-management, though these
 discussions were not necessarily specific to marine mammal co-management
 arrangements as authorized under the Marine Mammal Protection Act.)³⁴ This also
 reflects current practices, such as co-management between NMFS and the Tribal
 governments of St. Paul and St. George for northern fur seal management.

The Council and public may have other suggestions based on recent discussions. For example, examples of objectives related to reviewing the effectiveness of existing measures could be relevant to seabirds and marine mammals as well (e.g., Steller sea lion conservation measures).

6 Habitat

Current Groundfish FMP goal: Reduce and avoid impacts to habitat

Example (revised) cross-FMP goal: NO CHANGE

Explanation of suggestions

No changes are suggested to the wording of this goal. As currently worded, this goal could be adopted as a cross-FMP goal in support of Alternative 2.

All of the Council's FMPs include a goal and/or objectives related to habitat, and developing a cross-FMP goal on this theme would not be a change from existing guidance. Recent discussions including the Climate Scenarios Workshop emphasized that habitat and ecosystem resilience can help support ecosystem productivity and function, mitigate and buffer against the impacts of climate change, and support recovery from climate shocks. A cross-FMP goal related to ecosystem health would also be consistent with the Council's Ecosystem Policy and with the Bering Sea FEP goals and objectives.

Additional ideas

The Council could consider the following ideas when developing more specific objectives for implementing a cross-FMP goal focusing on habitat. Some topics would be consistent with the goal of habitat conservation, but may be more appropriate to address under other goals

³⁴ Section 119 of the Marine Mammal Protection Act (16 U.S.C. 1388(a)) allows NOAA Fisheries or the U.S. Fish and Wildlife Service (FWS) to establish agreements with Alaska Native Organizations (ANOs) to conserve marine mammals and provide for the co-management of subsistence use by Alaska Natives. ANOs are groups designated by law or formally chartered to represent Alaska Natives residing in Alaska. More information

because they can support multiple aspects of Council management. These topics include uptake of climate science (addressed under Goal 9 - Best available science) and use of spatial management measures (addressed under Goal 7 - Management measures).

Approach 2a (examples of objectives based on existing or planned initiatives)

- Improve understanding of gear impacts on habitat, and as appropriate, mitigate adverse impacts to the extent practicable (Reflects the Council's 5-year research priorities as adopted in June 2024,³⁵ and the Council's tasking³⁶ of staff with a discussion paper to inform options for incentivizing pelagic trawl gear innovation)
- Consider past and anticipated climate change impacts to Essential Fish Habitat (NMFS Procedure³⁷)
- Review the effectiveness of habitat protection measures under changing conditions (CCTF Final Report)

Approach 2b (examples of objectives that could be adopted under a more risk averse approach)

 Encourage avoidance of non-fishery impacts to EFH through EFH consultation authority (While not specifically cited as an idea at the CSW, this would be consistent with ideas in Section 4.5 - Cross-agency and international coordination, and Section 4.6 - Integrated cross-sector coordination.)

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

Explanation of suggestions

This goal could be reframed to reflect current conditions, as well as to improve consistency across FMPs and support Alternative 2. This current Groundfish FMPs goal is focused on the topics of equity and efficiency, which reflect National Standards 4 and 5. The current Groundfish FMPs goal also reflects the focus of groundfish management at the time this goal was adopted, which included managing excess fishing capacity and overcapitalization. Discussions at the Climate Scenarios Workshop observed that the Council's existing management programs can create barriers to flexibility and diversification, which are important strategies for adapting to change.³⁸

A cross-FMP goal focused on management measures would also improve consistency across FMPs. The Crab, Scallop, and Salmon FMPs do not refer to attributes of management

³⁵ D5 Research Priorities SSC Report and Motion, June 2024

³⁶ C2 Motion, February 2024

³⁷ Procedure for Addressing Climate Change in NMFS Essential Fish Habitat Consultations

³⁸ Climate Scenarios Workshop Report, Section 3.1

measures, though all include the phrase "adaptive management" and all include references to stability.³⁹

Revisions to this goal could improve cross-FMP consistency and illustrate the intent of Alternative 2 in the following ways.

➤ Refer to the qualities of flexibility and responsiveness. This would directly address the intent of the Council's Purpose and Need Statement to support "[policy guidance that] ...is adequate to meet current and forthcoming challenges" and "...to evaluate the management policy and objectives for Federal fishery management to be adaptable and responsive."

Additional ideas

The Council could consider the following ideas when developing more specific objectives for implementing a cross-FMP goal focusing on management flexibility and responsiveness. It is important to note here that these objectives may involve tradeoffs with objectives for providing access to fisheries and achieving social and economic outcomes, as discussed in depth in Section 3.1.2 of the CSW Report.

Approach 2a (examples of objectives based on existing or planned initiatives)

- Improve capacity and procedural mechanisms to support timely response to early warnings and signals of change (CSW 2.1 and 3.2, CRS)
- Comprehensively plan for and review the effectiveness of spatial management measures under changing conditions (CSW 3.4, CCTF report)
- Support the adaptive capacity of people and communities by identifying barriers and solutions to enable diversification and flexibility (CSW 3.1.1, CRS)
- Support community and industry-led approaches that can promote innovation and flexibility (CSW 3.1.1, CRS)

Approach 2b (examples of objectives that could be adopted under a more risk averse approach)

- Consider "if-then" mechanisms for automating climate-informed management responses (CSW 3.2)
- Proactively plan for shifting and emerging fisheries (CSW 3.1.2, 3.6)
- Develop capacity to support flexible and responsive management tools including dynamic and in-season management (CSW 3.5, CRS, CCTF Report, Climate Resilience Workplan)
- Systematically consider and develop metrics to evaluate climate resilience in management measures (CRS)

³⁹ Stability is addressed under Goal 2 - Social and economic benefits

8 Tribal and community access and engagement

Current Groundfish FMP goal: Increase Alaska Native and community consultation

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

Explanation of suggestions

Developing a cross-FMP goal related to Tribal and community access and engagement would be an opportunity to improve consistency across FMPs. The Groundfish FMPs include a goal and objectives specific to Alaska Native peoples and fishing communities while the Crab, Scallop, and Salmon FMPs do not, although all FMPs recognize subsistence users and the Salmon FMP refers to subsistence fishing supporting traditional social and cultural communities. The Bering Sea FEP also includes an objective related to sustainable opportunities and community resilience for subsistence users and Alaska Native communities.

Revisions to this goal are intended to clarify the Council's responsibilities and practices with regard to Tribal consultations, and distinguish between consultations and other forms of engagement and outreach.

➢ Remove the reference to "consultation," and refocus this goal on access and engagement. Refocusing this goal more accurately reflects the Council's responsibilities and activities with regard to Tribal and community engagement. The Council is not responsible for or directly engaged in Tribal consultations, which are conducted between NMFS and Tribal government officials,⁴⁰ though the Council may receive informational reports from NMFS and Council staff may participate in consultation meetings when requested. The Council and Council staff do engage in a wide range of outreach and engagement with a wide range of entities and individuals that may include Alaska Native Organizations, Tribal Consortia, other decision-making bodies, and rural communities.

Additional ideas

Some topics would be consistent with the goal of supporting Tribal and community access and engagement, and may result in some overlap with other goals as well. These include use of Local Knowledge and Traditional Knowledge, which is also addressed under Goal 9 - Best available science, and representation and participation in the Council process, which is also addressed under a proposed new Goal 10.

The Council could consider the following ideas when developing more specific objectives for implementing a cross-FMP goal focusing on Tribal and community access and engagement.

Approach 2a (examples of objectives based on existing or planned initiatives)

⁴⁰ Executive Order (E.O.) <u>13175</u> requires government agencies to have an accountable process to ensure timely and "meaningful consultation and collaboration with Tribal officials in the development of Federal policies that have tribal implications." In the Federal fisheries management process, consultations are a government-to-government dialogue between NMFS and Tribal government officials.

- Identify and support solutions for overcoming barriers to participation in the Council process (CSW 2.3)
- Recognize and follow best practices and guidelines for engaging with LKTKS knowledge systems and expertise (LKTKS Protocol)
- Recognize the importance of cultural values and practices, subsistence access and food security (CSW 2.3.5)

Approach 2b (examples of objectives that could be adopted under a more risk averse approach)

• Plan for increasing interactions with Arctic communities (CSW 2.3.4, SSC workshop)

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 information sources

Explanation of suggestions

Developing a cross-FMP goal related to best available science would directly address the intent of the Programmatic Purpose and Need Statement to "ensure that [policy guidance] is structured to use the best available science, which includes climate science and local and traditional knowledge." This would also be consistent with National Standard 2, the Council's Ecosystem Policy, and the goals and objectives of the Bering Sea FEP.

Adding this cross-FMP goal could also be an opportunity to improve consistency across FMPs. The Groundfish FMPs currently address the themes of data quality, monitoring, and enforcement under a single goal. The Crab and Scallop FMPs include a research and management objective but do not address monitoring or enforcement, and the Salmon FMP does not include a science or data-related objective. The Groundfish FMPs are the only FMPs that currently refer to LKTKS, and the Ecosystem Policy and Bering Sea FEP goals and objectives refer to LKTKS as well.

Revising this goal could improve cross-FMP consistency and illustrate the intent of Alternative 2 in the following ways.

- > Refocus this goal on best available science. This would be consistent with National Standard 2 and the Purpose and Need Statement for the Programmatic Evaluation.
- > Include the phrase "draw on the full range of available information sources." This wording recognizes that a broad range of information inputs and knowledge systems, including climate science and LKTKS, contribute to best available science.
 - Including climate science as a component of best available science is consistent
 with the Purpose and Need Statement, discussions at the CSW, the final report of
 the Climate Change Task Force and the Council's establishment of a Climate
 Resilience Work Plan to consider management tools and options focused on the
 inclusion of existing and emergent climate information.
 - Inclusion of LKTKS is consistent with the Purpose and Need Statement, the LKTKS Protocol, the CCTF Final Report, and with discussions at the CSW.
 - The broad wording of this goal continues to accommodate the original wording of Groundfish FMP Goal 9, which focuses on improving data quality and integrity, including through monitoring and enforcement.

Additional ideas

The Council could consider the following ideas when developing more specific objectives for implementing a cross-FMP goal focusing on best available science. The Council's recent climate resilience discussions and products, including the Climate Scenarios Workshop, the final report of the CCTF, and AFSC Climate Science Report,⁴¹ identify a large number of information inputs and research needs. It may be helpful to keep in mind that some ideas are more at the level of strategies and tactics for achieving objectives, and can be captured in other ways such as through Council research priorities and the newly established Climate Resilience Workplan.

Approach 2a (examples of objectives based on existing or planned initiatives)

- Continue to improve data quality and integrity, including through, monitoring and enforcement. (Previous Groundfish FMP goal)
- Evaluate management tools and options focused on the inclusion of existing and emergent climate information (CCTF Final Report, Climate Resilience Workplan, CSW)
- Develop capacity to evaluate tradeoffs and management options (CSW 5.6)
- Implement the LKTKS Protocol and on ramps and continue developing approaches to systematically consider LKTKS in Council processes. (CSW 5.1.1, CRS, LKTKS Protocol)
- Fully leverage existing information sources, and support investment in baseline data collection, including research surveys, to support existing and emerging needs (CSW 5)

Approach 2b (examples of objectives that could be adopted under a more risk averse approach)

- Improve capacity to identify early warnings and signals of change (CSW 3.2)
- Develop capacity to consider climate-related vulnerabilities, risks, and uncertainties (CSW 5.6)
- Support development of onramps and opportunities for collaboration, information sharing, and co-production of knowledge (CSW 5.1.2)

10 Council process (added)

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

Explanation of suggestions

There is not currently a Groundfish FMPs goal or objective related to the Council process; this would be a new goal. The Council could consider whether this should be a separate goal, or combined with Goal 8.

Developing a cross-FMP goal related to the Council process could be an opportunity to improve consistency across FMPs. The Groundfish FMPs management policy, Salmon FMP management policy, Ecosystem Policy, and Bering Sea FEP goals and objectives all refer to the

⁴¹ D1c AFSC Climate Report, December 2024

Council process using terms that include open, transparent, inclusive, and public. The Scallop and Crab FMPs also include due process objectives focusing on public access to the regulatory process.

Adding a Council process goal could also reflect discussions at the Climate Scenarios Workshop. Participants identified challenges to public participation, and suggested that climate change can amplify these concerns in terms of the uneven impacts of climate change across user groups, and the ability to have a voice in planning for an uncertain future. Participants also commented that a robust public process and two-way communication can help bring diverse perspectives and information inputs into the management process, identify signals of change, and help create trust and shared purpose. A Council process goal could provide a place to identify consistent, actionable objectives and evaluate progress toward their implementation.

Additional ideas

The Council could consider the following ideas when developing objectives for implementing a cross-FMP goal focusing on the public Council process. Resources including the Climate Scenarios Workshop report, Climate Readiness Synthesis, and final report⁴² of the Council's Community Engagement Committee also provide ideas for communication and outreach (for example using social media or videos; working with science communicators) that are more along the lines of strategies and tactics for implementing objectives.

Approach 2a (examples of objectives based on existing or planned initiatives)

- Support inclusive processes, collaborations, and partnerships that facilitate incorporation
 of multiple knowledge systems into climate planning and response (CCTF Final Report,
 Climate Resilience Workplan, CSW 2.2)
- Provide clear, concise, and accessible information to the extent practicable (CSW 2.3.1)
- Support diverse representation on Council advisory bodies and in other Council processes (CSW 2.3.4)

⁴² D1 Community Engagement Committee Report, February 2021

Appendix 2 Comparison tables of FMP goals and objectives

Table 3: Comparison of FMP goals and objectives by theme

Note, this only addresses yes/no whether there is a dedicated goal or objective related to each of these themes. Some themes may be addressed in other ways, including in management approaches or policies, or in introductory or explanatory text accompanying goals and objectives.

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
5 - Seabirds and marine mammals	NA	Yes	No	No	No
6 - Habitat	NA	Yes	Yes	Yes	Yes
7 - Management measures	4, 5	Yes	No	No	No
8 - Tribal and community access and engagement	NA	Yes	No	No	No
9 - Best available science	2	Yes	Partial ⁴³	Partial ⁴⁴	No

⁴³ The Groundfish FMPs include the themes of data quality, monitoring, and enforcement under a single goal. The Crab FMP includes a research and management objective but does not address monitoring or enforcement.

⁴⁴ See above; as with the Crab FMP the Scallop FMP includes a research and management objective but does not address monitoring or enforcement.

Other themes (not addressed as Groundfish FMP goals)					
Gear conflicts	NA	No	Yes	Yes	No
Safety at sea	10	Yes	Yes	Yes	Yes
Due process	NA	No	Yes	Yes	No
Managing stocks as a unit throughout their range	3	No	No	No	Yes
Protect wild stocks and fully utilize hatchery production	NA	No	No	No	Yes

Table 4: Text comparison of FMP goals and objectives by theme

Note: This table includes text excerpts of goals and objectives for a more detailed comparison. Goals and objectives are structured differently for each FMP

Theme	Groundfish	Crab	Scallops	Salmon
Groundfish goal themes				
Biological sustainability	Goal: Prevent overfishing	Objective: Ensure the long-term reproductive viability of king and Tanner crab populations	Objective: Ensure the long-term reproductive viability of scallop populations	Objective 1: Prevent overfishing and achieve optimum yield
Social and economic benefits; community sustainability	Goal: Promote sustainable fisheries and communities	Objective: Maximize economic and social benefits to the nation over time	Objective: Maximize economic and social benefits to the nation over time	Objective 4: Maximize economic and social benefits to the nation over time

Theme	Groundfish	Crab	Scallops	Salmon
Groundfish goal themes	s			
Ecosystem health	Goal: Preserve food web	NA ⁴⁵	NA ⁴⁶	NA ⁴⁷
Bycatch	Goal: Manage incidental catch and reduce bycatch and waste	NA ⁴⁸	NA ⁴⁹	Objective 3: Minimize bycatch and bycatch mortality
Seabirds and marine mammals	Goal: Reduce and avoid impacts to seabirds and marine mammals	NA	NA	NA
Habitat	Goal: Reduce and avoid impacts to habitat	Objective: To protect, conserve, and enhance adequate quantities of essential fish habitat (EFH) to support king and Tanner crab populations and maintain a healthy ecosystem.	Objective: To protect, conserve, and enhance adequate quantities of essential fish habitat (EFH) to support scallop populations and maintain a healthy ecosystem.	Objective 7: Identify and protect salmon habitat
Equity and efficiency	Goal: Promote equitable and efficient use of fishery resources	NA	NA	NA ⁵⁰

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⁴⁵ The Crab FMP does not include a goal or objective specific to ecosystems but does reference ecosystems within the text of the Habitat Objective: To protect, conserve, and enhance adequate quantities of essential fish habitat (EFH) to support king and Tanner crab populations and maintain a healthy ecosystem.

⁴⁶ See above; as with the Crab FMP the Scallop FMP does not include a goal or objective specific to ecosystems but does reference ecosystems within the text of the Habitat Objective: To protect, conserve, and enhance adequate quantities of essential fish habitat (EFH) to support scallop populations and maintain a healthy ecosystem

⁴⁷ The Salmon FMP does not include a goal or objective specific to ecosystems, although the Management Policy refers to "…ensur[ing] the sustainability of fishery resources and associated ecosystems…"

⁴⁸ The Crab FMP does not include a goal or objective specific to bycatch although the Biological Conservation Objective does refer to "maintaining low incidental catch of nonlegal crab."

⁴⁹ The Scallop FMP does not include a goal or objective specific to bycatch although the Biological Conservation Objective does refer to "...other biological concerns such as...maintaining low bycatch of finfish and crab."

⁵⁰ The Salmon FMP does not have an objective specific to equity and efficiency, though Objective 4- Maximize economic and social benefits to the nation over time refers to examining "fair and equitable allocation"

Theme	Groundfish	Crab	Scallops	Salmon	
Groundfish goal themes	Groundfish goal themes				
Alaska Native and community consultation	Goal: Increase Alaska Native and community consultation	NA	NA	NA	
Data quality, monitoring, and enforcement	Goal: Improve data quality, monitoring, and enforcement	Objective: Provide fisheries research, data collection, and analysis to ensure a sound information base for management decisions.	Objective: Provide fisheries research, data collection, and analysis to ensure a sound information base for management decisions.	NA ⁵¹	
Other FMP objectives					
Gear conflicts	NA	Objective: Minimize gear conflict among fisheries	Objective: Minimize gear conflict among fisheries	NA	
Safety at sea	Objective: Promote increased safety at sea ⁵²	Objective: Provide public access to the regulatory process for vessel safety considerations.	Objective: Provide public access to the regulatory process for vessel safety considerations	Objective 6: Promote safety	
Due process	NA ⁵³	Objective: Ensure that access to the regulatory process and opportunity for redress are available to all interested parties.	Objective: Ensure that access to the regulatory process and opportunity for redress are available to all interested parties.	NA ⁵⁴	
Managing stocks as a unit throughout their range	NA	NA	NA	Objective 2: Manage salmon as a unit throughout their range	

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⁵¹ The Salmon FMP does not include a dedicated objective focused on data quality, monitoring, or enforcement, but the Management Policy refers to "sound scientific research and analysis" and states that "all management measures shall be based on the best scientific information available."

⁵² Objective 9 under Goal: Promote sustainable fisheries and communities

⁵³ The Groundfish FMPs do not include a dedicated objective focused on due process, but the Management Approach states that "... This policy will use and improve upon the Council's existing open and transparent process of public involvement in decision-making."

⁵⁴ The Salmon FMP does not include a dedicated objective focused on due process, but the Management Policy states that "... This policy uses and improves upon the Council's existing open and transparent process of public involvement in decision-making."

Theme	Groundfish	Crab	Scallops	Salmon
Groundfish goal themes				
Hatchery production	NA	NA	NA	Objective 5: Protect wild stocks and fully utilize hatchery production

Table 5: Comparison of FMP goal and objectives themes against Ecosystem Policy and Bering Sea FEP Goals and **Objectives**

Topic	Ecosystem Policy (relevant phrases)	Bering Sea FEP (relevant goals and/or objectives)			
Groundfish goal themes	Groundfish goal themes				
Biological sustainability	Yes	Yes			
Social and economic benefits; community sustainability	Yes	Yes			
Ecosystem health	Yes	Yes			
Bycatch	No	Yes			
Seabirds and marine mammals	Yes	Yes			
Habitat	Yes	Yes			
Equity and efficiency	No	No			
Alaska Native and community consultation	No	Yes			
Data quality, monitoring, and enforcement	Yes ⁵⁵	Yes ⁵⁶			

 $^{^{55}}$ Addresses data and best available science but not monitoring and enforcement 56 Same as above

Other FMP objectives		
Gear conflicts	No	No
Safety at sea	No	No
Due process	Yes	Yes
Managing stocks as a unit throughout their range	No	No

Table 6: Excerpts of Ecosystem Policy and Bering Sea FEP Goals and Objectives by theme

Note: The Ecosystem Policy includes a Value Statement, a Vision Statement, and an Implementation Strategy but not goals or objectives. Examples of relevant phrases are provided to demonstrate thematic similarities.

Topic	Ecosystem Policy (relevant phrases)	Bering Sea FEP (relevant goals and/or objectives)			
Groundfish goal theme	Groundfish goal themes				
Biological sustainability	Value Statement: The North Pacific Fishery Management Council has an important stewardship responsibility for these resources, their productivity, and their sustainability for future generations.	Ecosystem Goal 1: Maintain, rebuild, and restore fish stocks at levels sufficient to protect, maintain, and restore food web structure and function.			
Social and economic benefits; community sustainability	Value Statement: This region produces over half the nation's seafood and supports robust fishing communities, recreational fisheries, and a subsistence way of life. Vision Statement: The Council envisions sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities	Ecosystem Goal 1: Provide for subsistence, commercial, recreational, and non-consumptive uses of the marine environment			

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Ecosystem health ⁵⁷	Vision Statement: The Council envisions sustainable fisheries thatare maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services	Ecosystem Goal 2: Protect, restore, and maintain the ecological processes, trophic levels, diversity, and overall productive capacity of the system (and associated Ecosystem Objectives, see Appendix 4B)
Bycatch	NA	Ecosystem Goal 4: Provide for subsistence, commercial, recreational, and non-consumptive uses of the marine environment; Ecosystem Objective 13: Provide for directed fisheries including subsistence fisheries by minimizing bycatch mortality
Seabirds and marine mammals	Vision Statement: support robust populations of marine species at all trophic levels, including marine mammals and seabirds	Ecosystem Goal 3: Conserve habitats for fish and other wildlife; Ecosystem Objective 8: Avoid and/or minimize impacts to seabirds, marine mammals, and protected species
Habitat	Implementation strategy: The Council intends that fishery management explicitly take into account environmental variability and uncertainty, changes and trends in climate and oceanographic conditions, fluctuations in productivity for managed species and associated ecosystem components, such as habitats and non-managed species	Ecosystem Goal 3: Conserve habitats for fish and other wildlife (and associated Ecosystem Objectives, see Appendix 4B)
Allocation, equity and efficiency	NA	NA
Alaska Native and community consultation	NA ⁵⁸	Ecosystem Goal 4: Provide for subsistence, commercial, recreational, and non-consumptive uses of the marine environment; Ecosystem Objective 12:

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⁵⁷ Example language provided; the Ecosystem Policy and BS FEP Goals and Objectives in the entirety are intended to provide guidance for achieving healthy and resilient ecosystems

⁵⁸ Does not include language specific to Alaska Native communities though the Implementation Strategy does reference local and traditional knowledge: Implementation will be responsive to changes in the ecosystem and our understanding of those dynamics, incorporate the best available science (including local and traditional knowledge)

		Support sustainable opportunities and community resilience for subsistence users and Alaska Native communities.
Data quality, monitoring, and enforcement	Data quality and research are addressed, monitoring and enforcement are not. Implementation strategy:incorporate the best available science (including local and traditional knowledge)	Data quality and research are addressed, monitoring ⁵⁹ and enforcement are not. Multiple relevant objectives, including a section on Research Objectives Process Objective 4: Develop discrete research objectives and associated Action Modules to identify and address research and information needs.
Other FMP objectives		
Gear conflicts	NA	NA
Safety at sea	NA	NA
Due process	Vision Statement: "The Council envisions sustainable fisheries thatare managed using a precautionary, transparent, and inclusive process" Implementation strategy: "Implementation willengage scientists, managers, and the public."	Process Objective 3: Maintain and improve upon the open and public process for the Council to identify ecosystem objectives and management responses, including engaging with communities that are in the Bering Sea ecosystem or users of the ecosystem
Managing stocks as a unit throughout their range	NA	NA

⁵⁹ Refers to "status and trend monitoring" of Bering Sea ecosystems but not fishery monitoring

Appendix 3 Current FMP Goals, Objectives, and Policies

Appendix 3A: BSAI and GOA Groundfish FMPs

Excerpted from <u>Fishery Management Plan</u> for the Groundfish of the Bering Sea and Aleutian Islands Management Area and the <u>Fishery Management Plan</u> for the Groundfish Fisheries of the Gulf of Alaska

Management Approach

The Council's policy is to apply judicious and responsible fisheries management practices, based on sound scientific research and analysis, proactively rather than reactively, to ensure the sustainability of fishery resources and associated ecosystems for the benefit of future, as well as current generations. The productivity of the North Pacific ecosystem is acknowledged to be among the highest in the world. For the past 25 years, the Council management approach has incorporated forward looking conservation measures that address differing levels of uncertainty. This management approach has in recent years been labeled the precautionary approach. Recognizing that potential changes in productivity may be caused by fluctuations in natural oceanographic conditions, fisheries, and other, non-fishing activities, the Council intends to continue to take appropriate measures to insure the continued sustainability of the managed species. It will carry out this objective by considering reasonable, adaptive management measures, as described in the Magnuson-Stevens Act and in conformance with the National Standards, the Endangered Species Act, the National Environmental Policy Act, and other applicable law. This management approach takes into account the National Academy of Science's recommendations on Sustainable Fisheries Policy.

As part of its policy, the Council intends to consider and adopt, as appropriate, measures that accelerate the Council's precautionary, adaptive management approach through community-based or rights-based management, ecosystem-based management principles that protect managed species from overfishing, and where appropriate and practicable, increase habitat protection and bycatch constraints. All management measures will be based on the best scientific information available. Given this intent, the fishery management goal is to provide sound conservation of the living marine resources; provide socially and economically viable fisheries for the well-being of fishing communities; minimize human-caused threats to protected species; maintain a healthy marine resource habitat; and incorporate ecosystem-based considerations into management decisions.

This management approach recognizes the need to balance many competing uses of marine resources and different social and economic goals for sustainable fishery management, including protection of the long-term health of the resource and the optimization of yield. This policy will use and improve upon the Council's existing open and transparent process of public involvement in decision-making.

Objectives

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.

To meet the goals of this overall management approach, the Council and National Marine Fisheries Service (NMFS) will use the Alaska Groundfish Fisheries Programmatic Supplemental Environmental Impact Statement (NMFS 2004) as a planning document. To help focus consideration of potential management measures, the Council and NMFS will use the following objectives as guideposts, to be re-evaluated, as amendments to the FMP are considered over the life of the analysis.

Note: The BSAI Groundfish FMP includes an additional objective under Goal 4: Manage incidental catch and reduce bycatch and waste - Objective 22: Continue to improve the retention of groundfish where practicable, through establishment of minimum groundfish retention standards.

Goal 1: Prevent Overfishing

- 1. Adopt conservative harvest levels for multi-species and single species fisheries and specify optimum yield.
- 2. Continue to use the existing optimum yield cap for the 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.

Goal 2: Promote Sustainable Fisheries and Communities

- 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.

Goal 3: Preserve Food Web

- 10. Develop indices of ecosystem health as targets for management.
- 11. Improve the procedure to adjust acceptable biological catch levels as necessary to account for uncertainty and ecosystem factors.
- 12. Continue to protect the integrity of the food web through limits on harvest of forage species.
- 13. Incorporate ecosystem-based considerations into fishery management decisions, as appropriate.

Goal 4: Manage Incidental Catch and Reduce Bycatch and Waste

- 14. Continue and improve current incidental catch and bycatch management program.
- 15. Develop incentive programs for bycatch reduction including the development of mechanisms to facilitate the formation of bycatch pools, vessel bycatch allowances, or other bycatch incentive systems.
- 16. Encourage research programs to evaluate current population estimates for non-target species with a view to setting appropriate bycatch limits, as information becomes available.
- 17. Continue program to reduce discards by developing management measures that encourage the use of gear and fishing techniques that reduce bycatch which includes economic discards.
- 18. Continue to manage incidental catch and bycatch through seasonal distribution of total allowable catch and geographical gear restrictions.
- 19. Continue to account for bycatch mortality in total allowable catch accounting and improve the accuracy of mortality assessments for target, prohibited species catch, and non-commercial species.
- Control the bycatch of prohibited species through prohibited species catch limits or other appropriate measures.
- 21. Reduce waste to biologically and socially acceptable levels.

Goal 5: Avoid Impacts to Seabirds and Marine Mammals

- 22. Continue to cooperate with the U.S. Fish and Wildlife Service (USFWS) to protect ESA-listed species, and if appropriate and practicable, other seabird species.
- 23. Maintain or adjust current protection measures as appropriate to avoid jeopardy of extinction or adverse modification of critical habitat for ESA-listed Steller sea lions.
- 24. Encourage programs to review status of endangered or threatened marine mammal stocks and fishing interactions and develop fishery management measures as appropriate.
- 25. Continue to cooperate with NMFS and USFWS to protect ESA-listed marine mammal species, and if appropriate and practicable, other marine mammal species.

Goal 6: Reduce and Avoid Impacts to Habitat

- 26. Review and evaluate efficacy of existing habitat protection measures for managed species.
- 27. Identify and designate essential fish habitat and habitat areas of particular concern pursuant to Magnuson-Stevens Act rules, and mitigate fishery impacts as necessary and practicable to continue the sustainability of managed species.
- 28. Develop a Marine Protected Area policy in coordination with national and state policies.
- 29. Encourage development of a research program to identify regional baseline habitat information and mapping, subject to funding and staff availability.
- 30. Develop goals, objectives and criteria to evaluate the efficacy and suitable design of marine protected areas and no-take marine reserves as tools to maintain abundance, diversity, and productivity. Implement marine protected areas if and where appropriate.

Goal 7: Promote Equitable and Efficient Use of Fishery Resources

- 31. Provide economic and community stability to harvesting and processing sectors through fair allocation of fishery resources.
- 32. Maintain the license limitation program, modified as necessary, and further decrease excess fishing capacity and overcapitalization by eliminating latent licensees and extending programs such as community or rights-based management to some or all groundfish fisheries.
- 33. Provide for adaptive management by periodically evaluating the effectiveness of rationalization programs and the allocation of access rights based on performance.
- 34. Develop management measures that, when practicable, consider the efficient use of fishery resources taking into account the interest of harvesters, processors, and communities.

Goal 8: Increase Alaska Native Consultation

- 35. Continue to incorporate local and traditional knowledge in fishery management.
- 36. Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.
- 37. Increase Alaska Native participation and consultation in fishery management.

Goal 9: Improve Data Quality, Monitoring and Enforcement

- 38. Increase the utility of groundfish fishery observer data for the conservation and management of living marine resources.
- 39. Develop funding mechanisms that achieve equitable costs to the industry for implementation of the North Pacific Groundfish Observer Program.
- 40. Improve community and regional economic impact costs and benefits through increased data reporting requirements.

- 41. Increase the quality of monitoring and enforcement data through improved technology.
- 42. Encourage a coordinated, long-term ecosystem monitoring program to collect baseline information and compile existing information from a variety of ongoing research initiatives, subject to funding and staff availability.
- 43. Cooperate with research institutions such as the North Pacific Research Board in identifying research needs to address pressing fishery issues.
- 44. Promote enhanced enforceability.
- 45. Continue to cooperate and coordinate management and enforcement programs with the Alaska Board of Fish, Alaska Department of Fish and Game, and Alaska Fish and Wildlife Protection, the U.S. Coast Guard, NMFS Enforcement, International Pacific Halibut Commission, Federal agencies, and other organizations to meet conservation requirements; promote economically healthy and sustainable fisheries and fishing communities; and maximize efficiencies in management and enforcement programs through continued consultation, coordination, and cooperation.

Appendix 3B: Crab FMP

Excerpted from <u>Fishery Management Plan</u> for Bering Sea/Aleutian Islands King and Tanner Crabs

Management Goal

The management goal is to maximize the overall long-term benefit to the nation of BS/AI stocks of king and Tanner crabs by coordinated Federal and State management, consistent with responsible stewardship for conservation of the crab resources and their habitats.

Management Objectives

Within the scope of the management goal, seven specific objectives have been identified. These relate to stock condition, economic and social objectives of the fishery, gear conflicts, habitat, weather and ocean conditions affecting safe access to the fishery, access of all interested parties to the process of revising this FMP and any implementing regulations, and necessary research and management. Each of these objectives requires relevant management measures (see Chapter 8). Several management measures may contribute to more than one objective, and several objectives may mesh in any given management decision on a case-by-case basis.

1. Biological Conservation Objective: Ensure the long-term reproductive viability of king and Tanner crab populations.

To ensure the continued reproductive viability of each king and Tanner crab population through protection of reproductive potential, management must prevent overfishing (see definition in Chapter 4). Management measures may also be adopted to address other biological concerns such as: restricting harvest of crabs during soft shell periods and maintaining low incidental catch of nonlegal crab. Other factors, including those currently under investigation, such as the

effects of cold air temperatures on incidentally-caught egg bearing females and their resultant larvae (Carls 1987), could also be considered. The maintenance of adequate reproductive potential in each crab stock will take precedence over economic and social considerations.

2. Economic and Social Objective: Maximize economic and social benefits to the nation over time.

Economic benefits are broadly defined to include, but are not limited to: profits, income, employment, benefits to consumers, and less tangible or less quantifiable social benefits such as the economic stability of coastal communities. To ensure that economic and social benefits derived for fisheries covered by this FMP are maximized over time, the following will be examined in the selection of management measures:

- The value of crab harvested (adjusted for the amount of crab dying prior to processing and discarded, which is known as deadloss) during the season for which management measures are considered,
- 2. The future value of crab, based on the value of a crab as a member of both the parent and harvestable stock.
- 3. Subsistence harvests within the registration area, and
- 4. Economic impacts on coastal communities.

This examination will be accomplished by considering, to the extent that data allow, the impact of management alternatives on the size of the catch during the current and future seasons and their associated prices, harvesting costs, processing costs, employment, the distribution of benefits among members of the harvesting, processing and consumer communities, management costs, and other factors affecting the ability to maximize the economic and social benefits as defined in this section.

Social benefits are tied to economic stability and impacts of commercial fishing associated with coastal communities. While social benefits can be difficult to quantify, economic indices may serve as proxy measures of the social benefits which accrue from commercial fishing. In 1984, 7 percent of total personal income or 27 percent of total personal income in the private sector in Alaska was derived from commercial fishing industries. However, in coastal communities most impacted by commercial fishing in the BS/Al area, the impacts were much greater. In 1984, 47 percent of the total personal income earned in the Southwest Region of Alaska (Aleutian Islands, Bethel, Bristol Bay Borough, Dillingham, and Wade Hampton Census Areas) or 98 percent of the total personal income in the private sector for this region was derived from commercial fishing activities (Berman and Hull 1987). Some coastal communities in this region are even more heavily dependent on commercial fish harvesting and/or processing than this. On a statewide basis, shellfish accounted for 21 percent of the total exvessel value of commercial fish harvested in Alaska in 1984. Therefore, social and economic impacts of BS/Al crab fisheries on coastal communities can be quite significant and must be considered in attempts to attain the economic and social objective.

Subsistence harvests must also be considered to ensure that subsistence requirements are met as required by law. Basically, State law requires that a reasonable opportunity be provided for subsistence use before other consumptive use is allowed. It is very difficult to evaluate the economic impact of subsistence fishing. Yet, fish, shellfish, and game harvested by subsistence users to provide food for the family or social group can greatly exceed the economic value of the product itself (R. Wolfe, ADF&G, Division of Subsistence, personal communication). Data on subsistence red king crab fishing have been obtained in the Norton Sound-Bering Strait area of the BS/AI management unit (Thomas 1981; Magdanz 1982, 1983; and Magdanz and Olanna 1984, 1985), and declines in subsistence harvests have been associated with changes in crab distributions, poor ice conditions, and reductions in crab stocks due to commercial harvest and poor recruitment (ADF&G 1986).

3. Gear Conflict Objective: Minimize gear conflict among fisheries.

Management measures developed for the king and Tanner crab fisheries will take into account the interaction of those fisheries, and the people engaged in them, with other fisheries. To minimize gear conflict among fisheries, the compatibility of different types of fishing gear and activities on the same fishing grounds should be considered. King and Tanner crab fisheries are conducted with pots, which are stationary gear. Many other fisheries in the fishery management unit, both domestic and foreign, are conducted with mobile trawl or seine gear. Seasons, gear storage, and fishing areas may be arranged to eliminate, insofar as possible, conflicts between gear types and preemption of fishing grounds by one form of gear over another.

4. Habitat Objective: To protect, conserve, and enhance adequate quantities of essential fish habitat (EFH) to support king and Tanner crab populations and maintain a healthy ecosystem.

Habitat is defined as the physical, chemical, geological, and biological surroundings the support healthy, self-sustaining populations of living marine resources. Habitat includes both the physical component of the environment which attracts living marine resources (e.g. salt marshes, sea grass beds, coral reefs, intertidal lagoons, and near shore characteristics) and the chemical (e.g. salinity, benthic community) and biological characteristics (e.g. scallop life stage histories, oceanography) that are necessary to support living marine resources. The quality and availability of habitat supporting the king and Tanner crab populations are important. Fishery managers should strive to ensure that those waters and substrate necessary to king and Tanner crabs for spawning, breeding, feeding, or growth to maturity are available. It is also important to consider the potential impact of king and Tanner crab fisheries on other fish and shellfish populations.

Those involved in both management and exploitation of king and Tanner crab resources will actively review actions by other human users of the management area to ensure that their actions do not cause deterioration of habitat. Any action by a State or Federal agency potentially affecting king and Tanner crab habitat in an adverse manner may be reviewed by the Council for possible action under the Magnuson-Stevens Act. The Council will also consider the effect on king and Tanner crab habitat of its own management decisions in other fisheries.

5. Vessel Safety Objective: Provide public access to the regulatory process for vessel safety considerations.

Upon request, and when appropriate, the Council and the State shall consider, and may provide for, temporary adjustments, after consultation with the Coast Guard and persons utilizing the fishery, regarding access to the fishery for vessels otherwise prevented from harvesting because of weather or other ocean conditions affecting the safety of vessels.

6. Due Process Objective: Ensure that access to the regulatory process and opportunity for redress are available to all interested parties.

In order to attain the maximum benefit to the nation, the interrelated biological, economic and social, habitat, and vessel safety objectives outlined above must be balanced against one another. A continuing dialogue between fishery managers, fishery scientists, fishermen, processors, consumers, and other interested parties is necessary to keep this balance. Insofar as is practical, management meetings will be scheduled around fishing seasons and in places where they can be attended by fishermen, processors, or other interested parties.

Access to the FMP development and regulatory process is available through membership in a Council work group, testimony on the record before the Council's Advisory Panel or SSC, or before the Council itself, testimony before the Board, conversations with members of the plan team or officials of regulatory agencies, and by commenting on the FMP, any subsequent amendments and any regulations proposed for their implementation.

This FMP defers much of day-to-day crab management to the State. Means of access to the regulatory process at the State level and of redress of perceived wrongs by the State are necessary.

7. Research and Management Objective: Provide fisheries research, data collection, and analysis to ensure a sound information base for management decisions.

Necessary data must be collected and analyzed in order to measure progress relative to other objectives and to ensure that management actions are adjusted to reflect new knowledge. Achieving the objective will require new and ongoing research and analysis relative to stock conditions, dynamic feedback to market conditions, and adaptive management strategies. For example, some possible research topics could include (1) the basis for exclusive registration areas, (2) the basis for sex restrictions in retained catch, (3) the basis for size limits, (4) the process for determining GHLs, (5) bioeconomic analyses of specific regulatory proposals, and (6) defining oceanographic conditions important to maximizing productivity of crab stocks.

An annual area management report to the Board discussing current biological and economic status of the fisheries, GHL ranges, and support for different management decisions or changes in harvest strategies will be prepared by the State (ADF&G lead agency), with NMFS and crab plan team input when appropriate. This will be available for public comment, and presented to

the Council on an annual basis. GHLs will be revised when new information is available. Such information will be made available to the public.

Appendix 3C: Scallop FMP

Excerpted from Fishery Management Plan for the Scallop Fishery off Alaska

The objective of the FMP is to prevent localized overfishing of scallop stocks and protect the long term productivity of the resource to allow for the achievement of optimum yield on a continuing basis. This objective is based on the premise that uncontrolled fishing for scallops in Federal waters could result in irreversible damage to the resource's ability to recover in a reasonable period of time. Fishing on a stock at a level that severely compromises that stock's future productivity is counter to the goals of the Magnuson Act and seriously jeopardizes the opportunity to harvest optimum yield on a continuing basis under a future management regime that would authorize a regulated fishery for scallops in Federal waters. Conservative management of the scallop resource is warranted given (1) unprecedented activity of vessels fishing for scallops in Federal waters outside the jurisdiction of Alaska State regulations, (2) the harvesting and processing capacity of the scallop fleet, which, if allowed to fish unregulated in Federal waters, could exceed State harvest guidelines by several orders of magnitude, (3) inadequate data on stock status and biology, and (4) the vulnerability of the scallop resource to localized depletion.

The Council, in cooperation with the State, is committed to developing a long-range plan for managing the scallop fishery that will promote a stable regulatory environment for the seafood industry and maintain the health of the resources and environment. The management system conforms to the Magnuson-Stevens Act's national standards as listed in Section 2.1.

Management Goal

The management goal is to maximize the overall long-term benefit to the nation of scallop stocks by coordinated Federal and State management, consistent with responsible stewardship for conservation of the scallop resource and its habitats.

Management Objectives

Within the scope of the management goal, seven specific objectives have been identified. These relate to stock condition, economic and social objectives of the fishery, gear conflicts, habitat, weather and ocean conditions affecting safe access to the fishery, access of all interested parties to the process of revising this FMP and any implementing regulations, and necessary research and management. Each of these objectives requires relevant management measures. Several management measures may contribute to more than one objective, and several objectives may mesh in any given management decision on a case-by-case basis.

1. Biological Conservation Objective: Ensure the long-term reproductive viability of scallop populations.

To ensure the continued reproductive viability of each scallop population through protection of reproductive potential, management must prevent overfishing. Management measures also may be adopted to address other biological concerns such as restricting harvest of scallops during spawning periods and maintaining low bycatch of finfish and crab. The maintenance of adequate reproductive potential in each scallop stock will take precedence over economic and social considerations.

2. Economic and Social Objective: Maximize economic and social benefits to the nation over time.

Economic benefits are broadly defined to include, but are not limited to: profits, income, employment, benefits to consumers, and less tangible or less quantifiable social benefits such as the economic stability of coastal communities. To ensure that economic and social benefits derived for fisheries covered by this FMP are maximized over time, the following will be examined in the selection of management measures:

- The value of scallops harvested during the season for which management measures are considered.
- The future value of scallop stocks,
- Economic impacts on coastal communities.

This examination will be accomplished by considering, to the extent that data allow, the impact of management alternatives on the size of the catch during the current and future seasons and their associated prices, harvesting costs, processing costs, employment, the distribution of benefits among members of the harvesting, processing and consumer communities, management costs, and other factors affecting the ability to maximize the economic and social benefits as defined in this section.

Social benefits are tied to economic stability and impacts of commercial fishing associated with coastal communities. While social benefits can be difficult to quantify, economic indices may serve as proxy measures of the social benefits which accrue from commercial fishing. In 1984, 7% of total personal income or 27% of total personal income in the private sector in Alaska was derived from commercial fishing industries. On a statewide basis, shellfish accounted for 21% of the total exvessel value of commercial fish harvested in Alaska in 1984, however, the bulk of shellfish harvests were king and Tanner crab.

3. Gear Conflict Objective: Minimize gear conflict among fisheries.

Management measures developed for the scallop fisheries will take into account the interaction of those fisheries, and the people engaged in them, with other fisheries. To minimize gear conflict among fisheries, the compatibility of different types of fishing gear and activities on the

same fishing grounds should be considered. Scallop fisheries are conducted with dredge gear. Many other fisheries in the fishery management unit are conducted with fixed gear (pot and hook-and-line). Fishing seasons, gear storage, and fishing areas may be arranged to eliminate, insofar as possible, conflicts between gear types and preemption of fishing grounds by one form of gear over another.

4. Habitat Objective: To protect, conserve, and enhance adequate quantities of essential fish habitat (EFH) to support scallop populations and maintain a healthy ecosystem

Habitat is defined as the physical, chemical, geological, and biological surroundings the support healthy, self-sustaining populations of living marine resources. Habitat includes both the physical component of the environment which attracts living marine resources (e.g. salt marshes, sea grass beds, coral reefs, intertidal lagoons, and near shore characteristics) and the chemical (e.g. salinity, benthic community) and biological characteristics (e.g. scallop life stage histories, oceanography) that are necessary to support living marine resources. The quality and availability of habitat supporting the scallop populations are important. Fishery managers should strive to ensure that those waters and substrate necessary to scallops for spawning, breeding, feeding, or growth to maturity are available. It is also important to consider the potential impact of scallop fisheries on other fish and shellfish populations.

Those involved in both management and exploitation of scallop resources will actively review actions by other human users of the management area to ensure that their actions do not cause deterioration of habitat. Any action by a State or Federal agency potentially affecting scallop habitat in an adverse manner may be reviewed by the Council for possible action under the Magnuson-Stevens Act. The Council will also consider the effect on scallop habitat of its own management decisions in other fisheries.

5. Vessel Safety Objective: Provide public access to the regulatory process for vessel safety considerations.

Upon request, and when appropriate, the Council and the State shall consider, and may provide for, temporary adjustments, after consultation with the Coast Guard and persons utilizing the fishery, regarding access to the fishery for vessels otherwise prevented from harvesting because of weather or other ocean conditions affecting the safety of vessels.

6. Due Process Objective: Ensure that access to the regulatory process and opportunity for redress are available to all interested parties.

In order to attain the maximum benefit to the nation, the interrelated biological, economic and social, habitat, and vessel safety objectives outlined above must be balanced against one another. A continuing dialogue between fishery managers, fishery scientists, fishermen, processors, consumers, and other interested parties is necessary to keep this balance. Insofar as is practical, management meetings will be scheduled around fishing seasons and in places where they can be attended by fishermen, processors, or other interested parties.

Access to the FMP development and regulatory process is available through membership in a Council work group, testimony on the record before the Council's Advisory Panel or SSC, or before the Council itself, testimony before the Board, conversations with members of the plan team or officials of regulatory agencies, and by commenting on the FMP, any subsequent amendments and any regulations proposed for their implementation.

This FMP defers much of day-to-day scallop management to the State. Means of access to the regulatory process at the State level and of redress of perceived wrongs by the State are necessary.

7. Research and Management Objective: Provide fisheries research, data collection, and analysis to ensure a sound information base for management decisions.

Necessary data must be collected and analyzed in order to measure progress relative to other objectives and to ensure that management actions are adjusted to reflect new knowledge. Achieving the objective will require new and ongoing research and analysis relative to stock conditions, dynamic feedback to market conditions, and adaptive management strategies.

A Stock Assessment Fishery Evaluation (SAFE) report discussing current biological and economic status of the fisheries, guideline harvest ranges, and support for different management decisions or changes in harvest strategies will be prepared by the State (ADF&G lead agency), with NMFS and scallop plan team input when appropriate. Such information will be made available to the public.

The management program authorized under this FMP conforms to the Magnuson Act's national standards as listed in section 2.1. Under this FMP, the prevention of overfishing of the Alaska scallop stocks and the maintenance of adequate reproductive potential for the scallop resource takes precedence over other economic, social, management and research considerations.

Appendix 3D: Salmon FMP

Excerpted from Fishery Management Plan for the Salmon Fisheries in the EEZ off Alaska

Note, language pertaining to Cook Inlet salmon management was added in 2024.

Management Policies

The Council's salmon management policy for the East Area and West Area is to facilitate State of Alaska salmon management in accordance with the Magnuson-Stevens Act, Pacific Salmon Treaty, and applicable Federal law. This FMP represents the Council's contribution to a comprehensive management regime for the salmon fishery that will be achieved in concert with actions taken by the Pacific Salmon Commission and the State of Alaska. This policy ensures the application of judicious and responsible fisheries management practices, based on sound scientific research and analysis, proactively rather than reactively, to ensure the sustainability of fishery resources and associated ecosystems for the benefit of future, as well as current generations.

The salmon management policy for the Cook Inlet EEZ Area is to ensure the application of judicious and responsible fishery management practices, based on sound scientific research and analysis, proactively rather than reactively, to ensure the sustainability of fishery resources and associated ecosystems for the benefit of present and future generations. The management

approach incorporates forward-looking and precautionary conservation measures that address differing levels of uncertainty. Recognizing that potential changes in productivity may be caused by fluctuations in natural oceanographic conditions, fisheries, and other, non-fishing activities, the Council should take appropriate measures to ensure the continued sustainability of the managed species. It will carry out this objective by considering reasonable, adaptive management measures, as described in the MSA and consistent with the National Standards and other applicable law.

Under these policies, all management measures will be based on the best scientific information available. This management policy recognizes the need to balance many competing uses of marine resources and different social and economic objectives for sustainable fishery management, including protection of the long-term health of the resource and the optimization of yield. This policy uses and improves upon the Council's and State's existing open and transparent process of public involvement in decision-making.

Management Objectives

The Council has identified the following seven management objectives to carry out the management policy for this FMP. The Council and NMFS will consider the following objectives in developing amendments to this FMP and associated management measures. Because adaptive management requires regular review, the management objectives identified in this section will be reviewed periodically by the Council. The Council and NMFS will also review, modify, eliminate, or consider new management measures, as appropriate, to best carry out the management objectives for this FMP.

Objective 1 – Prevent overfishing and achieve optimum yield

Manage the commercial and sport salmon fisheries in the East Areas in concert with the Pacific Salmon Commission, and in accordance with the conservation and harvest sharing goals of the Pacific Salmon Treaty, to prevent overfishing and obtain the number and distribution of spawning fish capable of producing the optimum yield on a sustained basis (wild and hatchery). Prevent overfishing and achieve optimum yield in the West Area by prohibiting the commercial harvest of salmon. Prohibiting commercial harvest enables the State of Alaska to manage salmon fisheries to achieve escapement goals and maximize economic and social benefits from the fishery.

For the Cook Inlet EEZ Area, manage the salmon fishery to prevent overfishing and produce the number and distribution of spawning fish capable of achieving optimum yield on a continuing basis.

Objective 2 – Manage salmon as a unit throughout their range

Manage salmon fisheries in the EEZ in a manner that enables the State of Alaska to manage salmon stocks seamlessly throughout their range. In the East Area, this objective is achieved by delegating management of the sport and commercial troll fishery to the State of Alaska, to manage consistent with state and federal laws, including the Pacific Salmon Treaty. In the West Area, this objective is achieved by prohibiting commercial fishing for salmon in the West Area so

that the State of Alaska can manage Alaska salmon stocks as a unit. In the Cook Inlet EEZ Area, this objective is achieved by using all pertinent salmon data in the process to establish status determination criteria and to coordinate management with the State of Alaska to the extent practicable.

Objective 3 – Minimize Bycatch and Bycatch Mortality

To the extent practicable, manage salmon fisheries to minimize bycatch and minimize the mortality of unavoidable bycatch. Decrease where possible the incidental mortalities of salmon hooked and released, consistent with allocation decisions and the objective of providing the greatest overall benefit to the people of the United States.

Objective 4 - Maximize economic and social benefits to the nation over time

Economic benefits are broadly defined to include, but are not limited to: profits, income, employment, benefits to consumers, and less tangible or less quantifiable benefits such as the economic stability of coastal communities, recreational value, non-consumptive use value, and non-use value. To ensure that economic and social benefits derived for fisheries covered by this FMP are maximized over time, the following will be examined in the selection of management measures:

- Control of fishing effort and salmon catches.
- Fair and equitable allocation of harvestable surplus of salmon.
- Economic impacts on coastal communities and other identifiable dependent groups (e.g., subsistence users).

This examination will be accomplished by considering, to the extent that data allow, the impact of management measures on the size of the catch during the current and future seasons and their associated prices, harvesting costs, processing costs, employment, the distribution of benefits among members of the harvesting, processing and consumer communities, management costs, and other factors affecting the ability to maximize the economic and social benefits as defined in this section. Other benefits are tied to economic stability and impacts of commercial fishing, as well as, unguided and charter recreational fishing associated with coastal communities, subsistence fishing supporting traditional social and cultural 'communities,' and passive-use 'communities'.

Objective 5 – Protect wild stocks and fully utilize hatchery production

Manage salmon fisheries to ensure sustainability of naturally spawning stocks while providing access to hatchery production.

Objective 6 – Promote Safety

Promote the safety of human life at sea in the development of fisheries management measures. Upon request, and from time to time as appropriate, the Council, NMFS, or the State of Alaska may provide for temporary adjustments, after consultation with the U.S. Coast Guard and fishery participants, for vessels that are otherwise excluded because of weather or ocean conditions

causing safety concerns while ensuring no adverse effect on conservation in other fisheries or discrimination among fishery participants.

Objective 7 – Identify and Protect Salmon Habitat

Use the best available science to identify and describe essential fish habitat pursuant to the MSA, and mitigate fishery impacts in the EEZ as necessary and practicable to continue the sustainability of managed species.

Appendix 4 Ecosystem Goals, Objectives, and Guidance

Appendix 4A: Ecosystem Policy

Excerpted from NPFMC Management Policies

In February 2014, the Council adopted an Ecosystem Policy that shall be given effect through all of the Council's work, including long-term planning initiatives, fishery management actions, and science planning to support ecosystem-based fishery management. The Ecosystem Policy includes three parts: a Value Statement, a Vision Statement, and an Implementation Strategy.

North Pacific Fishery Management Council Ecosystem Policy

Value Statement – The Gulf of Alaska, Bering Sea, and the Aleutian Islands are some of the most biologically productive and unique marine ecosystems in the world, supporting globally significant populations of marine mammals, seabirds, fish, and shellfish. This region produces over half the nation's seafood and supports robust fishing communities, recreational fisheries, and a subsistence way of life. The Arctic ecosystem is a dynamic environment that is experiencing an unprecedented rate of loss of sea ice and other effects of climate change, resulting in elevated levels of risk and uncertainty. The North Pacific Fishery Management Council has an important stewardship responsibility for these resources, their productivity, and their sustainability for future generations.

Vision Statement – The Council envisions sustainable fisheries that provide benefits for harvesters, processors, recreational and subsistence users, and fishing communities, which (1) are maintained by healthy, productive, biodiverse, resilient marine ecosystems that support a range of services; (2) support robust populations of marine species at all trophic levels, including marine mammals and seabirds; and (3) are managed using a precautionary, transparent, and inclusive process that allows for analyses of tradeoffs, accounts for changing conditions, and mitigates threats.

Implementation Strategy – The Council intends that fishery management explicitly take into account environmental variability and uncertainty, changes and trends in climate and oceanographic conditions, fluctuations in productivity for managed species, and associated ecosystem components, such as habitats and non-managed species, and relationships between marine species. Implementation will be responsive to changes in the ecosystem, and our understanding of those dynamics, incorporate the best available science, including local and traditional knowledge, and engage scientists, managers, and the public.

Appendix 4B: Bering Sea Fishery Ecosystem Plan Goals and Objectives

Excerpted from the Bering Sea Fishery Ecosystem Plan

Ecosystem Goals

- 1. Maintain, rebuild, and restore fish stocks at levels sufficient to protect, maintain, and restore food web structure and function;
- 2. Protect, restore, and maintain the ecological processes, trophic levels, diversity, and overall productive capacity of the system;
- 3. Conserve habitats for fish and other wildlife;
- 4. Provide for subsistence, commercial, recreational, and non-consumptive uses of the marine environment;
- 5. Avoid irreversible or long-term adverse effects on fishery resources and the marine environment;
- 6. Provide a legacy of healthy ecosystems for future generations.

Process Objectives

The following Process Objectives provide the Council's objectives for implementing the Alaska-wide ecosystem goals specifically for the Bering Sea ecosystem area, through the BS FEP.

- 1. Create and implement a cohesive process for Bering Sea EBFM, using the Council's ecosystem vision statement, which provides a mechanism for incorporating new sources of ecosystem information into Council processes, and defines the Council's management process to improve understanding by the broader public.
- 2. Create a transparent process to track the Council's progress towards achieving its six ecosystem goals.
- 3. Maintain and improve upon the open and public process for the Council to identify ecosystem objectives and management responses, including engaging with communities that are in the Bering Sea ecosystem or users of the ecosystem.
- 4. Develop discrete research objectives and associated Action Modules to identify and address research and information needs.
- 5. Improve incorporation of local knowledge (LK) and traditional knowledge (TK) in Council management for the Bering Sea ecosystem
- 6. Facilitate and organize communication of ecosystem science, LK, TK, and relevant Council policy between scientists, communities, and decision makers
- 7. Provide a framework that would identify and prioritize research and information needs across disciplines
- Synthesize and update current scientific understandings of Bering Sea ecosystem
 processes and status, including fisheries and subsistence use, to inform fishery
 management.
- 9. Maintain and enhance systematic status and trend monitoring of Bering Sea ecosystem processes and status relative to ecosystem objectives to detect change.

- 10. Create and track performance metrics to evaluate the ecosystem effects of specific management actions.
- 11. Track how BS FEP information is used in Council process
- 12. Establish a process to use ecosystem information to inform decisions for adaptive management, including to address changing circumstances under novel or intensified stressors.
- 13. Provide a framework for considering management strategies and associated opportunities, risks, tradeoffs, and cumulative effects affecting Council-managed species and the broader Bering Sea ecosystem, with consideration for ecological, economic, social, and cultural factors of fishery harvest.
- 14. Periodically review and refine the content of the Core BS FEP, including specification of process, ecosystem, and research objectives.

Research Objectives

The Research Objectives provide the bridge between the Process Objectives and Action Modules to be initiated under the BS FEP framework. Every Research Objective is related to at least one of the Process Objectives. Additionally, each Research Objective has two equally important parts: the research question, and the avenue for that information feeding into the management process.

- Evaluate and develop resiliency for the Council's management strategies in the Bering Sea, and investigate options for responding to changing environmental and climatic circumstances such as changes to fish distribution and abundance, shipping patterns, etc.
 - Links to Process Objective 14
- 2. Develop processes to guide the use of subsistence data, local knowledge (LK), and traditional knowledge (TK) information from the Bering Sea in the Council process.
 - Links to Process Objective 6
- Assess Council management in the Bering Sea with respect to ecosystem-based fishery
 management best practices and identify areas of success and gaps indicating areas for
 improvement, on a regular basis.
 - Links to Process Objective 1
- 4. Identify and develop interdisciplinary conceptual model(s) of the connected Bering Sea ecosystem components to respond to specific management questions.
 - Links to Process Objective 7
- 5. Develop methods to track whether Council Bering Sea research priorities are effectively articulated to partner research agencies, and how funded research is eventually used in the Council process.
 - Links to Process Objective 8

Ecosystem Objectives

For fishery management to more explicitly take into account and be responsive to changes in the ecosystem, each of the six overarching Ecosystem Goals are associated with one or more strategic Ecosystem Objectives.

Ecosystem Goal 1: Maintain, rebuild, and restore fish stocks at levels sufficient to protect, maintain, and restore food web structure and function

- 1. Maintain target biomass levels for target species, consistent with optimum yield, using available tools.
- 2. Maintain healthy populations and function of non-target and forage species.
- 3. Adjust fishing-related mortality from the system to be sustainable and commensurate with total productivity and continue to limit optimum yield to 2 million metric tons for the BSAI groundfish fisheries.

Ecosystem Goal 2: Protect, restore, and maintain the ecological processes, trophic levels, diversity, and overall productive capacity of the system

- 4. Maintain key predator/prey relationships.
- 5. Conserve structure and function of ecosystem components.

Ecosystem Goal 3: Conserve habitats for fish and other wildlife

- 6. Minimize adverse impacts to essential fish habitat, to the extent practicable.
- 7. Avoid and/or minimize impacts to ecologically-sensitive habitat, including habitat areas of particular concern (HAPCs).
- 8. Avoid and/or minimize impacts to seabirds, marine mammals, and protected species.

Ecosystem Goal 4: Provide for subsistence, commercial, recreational, and non-consumptive uses of the marine environment

- 9. Support benefits in the Bering Sea fishery and fishery-related industries.
- 10. Provide opportunities for new entrants in Federal fisheries.
- 11. Promote economic and community stability to all commercial harvesting and processing sectors.
- 12. Support sustainable opportunities and community resilience for subsistence users and Alaska Native communities.
- 13. Provide for directed fisheries including subsistence fisheries by minimizing bycatch mortality.
- 14. Preserve the ability for stakeholders to derive non-consumptive and cultural value from the Bering Sea ecosystem.

Ecosystem Goal 5: Avoid irreversible or long-term adverse effects on fishery resources and the marine environment

Ecosystem Goal 6: Provide a legacy of healthy ecosystems for future generations *Combined objectives for goals 5 and 6:*

- 15. Establish appropriate thresholds to minimize risk of crossing ecosystem tipping points caused by fishery or other human activity.
- 16. Encourage responsible parties to minimize adverse impacts to fish and other wildlife associated with changes in shipping activity, tourism, energy, and other types of development.
- 17. Ensure that fishery management is sufficiently adaptive to account for the effects of climate change or other ecosystem changes, including loss of sea ice and ocean acidification.

Appendix 5 Local Knowledge, Traditional Knowledge, and Subsistence Protocol

Excerpted from the Council's October 2023 motion approving the LKTKS Protocol

The Council supports and commends the work of the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Taskforce. The Council approves the LKTKS Protocol in full as a living document to provide guidance for identifying, analyzing, and incorporating Local Knowledge, Traditional Knowledge, and subsistence information into the Council's decision-making process when there is a clear Federal fisheries nexus. The Council also approves the following 'LKTKS Policy' statement to summarize the approach in the guidance:

The Council adopted the Local Knowledge (LK), Traditional Knowledge (TK), and Subsistence Protocol (LKTKS Protocol) in October 2023. The LKTKS Protocol provides foundational information and context for identifying, analyzing, and incorporating LK, TK, and subsistence information into the Council's decisionmaking process. At the core of this work is the recognition of diversity among the people that engage in, depend on, and are impacted by the federal fisheries managed by the Council. Effective fisheries management that supports sustainable fisheries and ecosystems requires robust science and an inclusive decision-making process that fosters relationships and trust.

The Council recognizes the importance of the LKTKS Protocol for informing its decision-making process and envisions it will foster a more inclusive decision-making process, expand its information base, and improve the robustness of the best scientific information available to inform its decision-making. The approach to working with these knowledge systems includes:

- The Council, staff, and advisory bodies intend to demonstrate respect for LK and TK systems, LK and TK holders, the social science of LK and TK, and subsistence gatherers and their information.
- 2. The Council, staff, and Council advisory bodies recognize the importance of understanding and using the appropriate terms for LK, TK, and subsistence information while carrying out their work.
- 3. The Council, staff, and advisory bodies are committed to taking the appropriate steps to accurately identify LK and TK holders, the social science of LK and TK, and subsistence information and to identify when such knowledge and information has a clear federal fisheries nexus to integrate into the Council process.
- 4. The Council recognizes the importance of, and will work to prioritize, early and ongoing communication with relevant entities holding or representing LK and TK systems. This includes but is not limited to Tribes, Alaska Native Organizations, fishermen, fishing or processing associations, as well as cooperatives, and others.
- The Council will endeavor to understand and acknowledge capacity differences among the entities (i.e., Tribes, Alaska Native Organizations, fishermen, fishing associations or cooperatives, and others).

- 6. The Council will endeavor to adhere to local and cultural protocols that entities have established for sharing and communicating LK, TK, or subsistence information when they are shared with the Council, staff, or its advisory bodies.
- 7. The Council acknowledges the challenge and importance of having the appropriate capacity for identifying and working with LK and TK systems and subsistence information. The Council will work to identify opportunities to increase this capacity and engage in opportunities for increasing LK, TK, and subsistence capacity as able.
- 8. The Council, staff, and advisory bodies intend to equitably work across and account for multiple knowledge systems.