

ECOSYSTEM ADVISORY SUBPANEL REPORT ON
SPECIAL PROJECT 1: ADAPTIVE MANAGEMENT AND FLEXIBILITY

The Ecosystem Advisory Subpanel (EAS) reviewed the Pacific Fishery Management Council (Council) Staff Report on Council Special Project 1: Adaptive Management and Flexibility - Process and Timeline Overview (Agenda Item H.1, Attachment 1) as well as the proposed plans for the three priority areas: (1) “If-then” statements and inseason management actions for Fishery Management Plans (FMPs, Agenda Item H.1, Attachment 2); (2) Exempted Fishing Permit (EFP) process improvements for all FMPs (Agenda Item H.1, Attachment 3); and (3) improved processes for data streams and integration of Local and Indigenous Knowledge (Agenda Item H.1, Attachment 4). We received a briefing from Ms. Gilly Lyons during our webinar on April 6, 2026. The EAS appreciates the comprehensive and detailed Staff Reports and proposed plans as well as the supplemental report on Council Action Meeting Requirements (Agenda Item H.1, Supplemental Attachment 5). Our recommendations are highlighted in the attached Tables 1, 2, and 3 and explained below.

The EAS supports further development of the tools described in the Staff Reports. However, the EAS recognizes the limits of Council time and the need to prioritize projects. Accordingly, the EAS continues to support prioritization of two items:

1. Developing and implementing if-then statements; and
2. Improving processes for data streams and integration of Local and Indigenous Knowledge.

Within the plan for if-then statements, the EAS gives highest priority to Action Item 1, specifying a framework and process to support the development of new if-then statements, medium priority to Action Item 2, conducting a review of the use of if-then statements in both National Marine Fisheries Service (NMFS) regulations and the Council process, and lowest priority to Action Item 3, requesting that Management Teams, in collaboration with their respective Advisory Subpanels, review and consider opportunities to develop if-then statements and/or new inseason management actions.

Action Item 1 seems most likely to result in Council incorporation of if-then statements into management. When developing a framework and process, the EAS suggests that decision trees be explored as a more effective implementation of if-then statements, which would require multiple “if” statements to be true before triggering a predefined action. Furthermore, we agree that if-then statements need to be grounded in clear scientific evidence in order for stakeholders to have confidence in and support for the outcome. We encourage connecting if-then statements to the collection of Local and Indigenous Knowledge (for example, using on-the-water observations as a trigger). Action Item 2 may allow the Council to learn from other regions and from NMFS, but may delay work on the process for developing if-then statements. Action Item 3 seems likely to expand the timeline for developing if-then statements and is better suited as a follow-on action after development of a framework and process and when the Council can provide more specific guidance.

The EAS also supports improving processes for data streams and integration of Local and Indigenous Knowledge. We see an opportunity for tribal, commercial, and recreational fishermen to collect and provide real-time objective ecological data as well as subjective observations of stock abundance and distribution in varying conditions. To this end, we give highest priority to Action Item 4, On-the-Water Observations Feedback Tool. This tool has a clear connection between the observations and how they will be used, which is key to ensuring participation and developing trust with Local Knowledge holders. Again, we encourage the Council to take this opportunity to connect on-the-water observations to if-then statements.

The EAS also discussed EFP process improvements. If the Council continues with this project, then we recommend the Council focus on Action Item 2, creating ways for the Council to prioritize applicants likely to actively use EFP; Action Item 4, promoting flexibility and efficiency in Council EFP process; and Action Item 9, frontloading environmental analyses and building in flexibilities. EFPs require substantial time and resource commitments from fishermen, Council, NMFS, and community members. We see value in prioritizing applications that are more likely to be actively fished or generate useful data. We discussed that allowing flexibility in EFPs may increase participation and collection of important data that advances sustainable fisheries management. Finally, the Council can provide EFP parameters that are clear and transparent by frontloading environmental analyses.

The EAS discussed whether Council staff should develop draft criteria and a proposed approach to applying that criteria when determining if an action could be completed in fewer meetings than under status quo (Agenda Item H.1, Supplemental Attachment 5). The EAS supports Council procedural improvements but recommends this work focus on the three priority areas identified under Special Project 1.

Table 1, Priority Area: If-Then Statements and Inseason Management Actions (Attachment 2)	
Action Item	Recommendation
1. Specify a framework and process to support the development of new if-then statements	High Priority
2. Conduct a review of the use of if-then statements in both NMFS regulations and the Council process	Medium Priority
3. Request that Management Teams, in collaboration with their respective Advisory Subpanels, review and consider opportunities to develop if-then statements and/or new inseason management actions	Low Priority

Table 2, Priority Area: Exempted Fishing Permit Process Improvements ([Attachment 3](#))

Action Item	Recommendation
1. Create clear Council EFP materials for applicants	
2. Create ways for Council to prioritize applicants likely to actively use EFP	High Priority
3. Identify Council research priorities critical for increasing adaptive capacity and well-suited for EFPs	
4. Promote flexibility and efficiency in Council EFP process	High Priority
5. Standardize the protocol for initial review of EFP applications	
6. Allow for a one-meeting process for certain EFPs and identify other review flexibilities	
7. Make technical edits and updates to the Council Operating Procedures	
8. Develop criteria for considering EFPs outside of designated windows	
9. Frontload environmental analyses and build in flexibilities	High Priority
10. Create more efficiency, consistency, and accessibility for EFP reporting and data	
11. Establish a “checkpoint” schedule for considering EFP-informed management changes	
12. Create templates for assessing risk and scientific uncertainty to use when considering an EFP-informed regulatory change	

Table 3, Priority Area : Improved Process for Data Streams and Integration of Local and Indigenous Knowledge ([Attachment 4](#))

Action Item	Recommendation
1a: Email Portal for Sharing On-the-Water Observations for Inclusion in California Current Ecosystem Status Report (ESR)	
1b: New ESR Section or Appendix for On-the-Water Observations	
2: Fishermen’s Roundtables	
3: Fishery Performance Reports	
4: On-the-Water Observations Feedback Tool	High Priority
5: Workshop to Identify Local Knowledge Priorities and Pathways	

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