

## COUNCIL AND NMFS LEADERSHIP REPORT ON CAPACITY ALIGNMENT

### **1. Introduction**

Over the past year, the Pacific Fishery Management Council (Council) and National Marine Fisheries Service (NMFS) leadership have engaged in discussions regarding workload, staffing capacity, and the long-term sustainability of the West Coast fishery management process. These discussions have occurred in the context of ongoing workload concerns across the Council process, increasing analytical and procedural complexity, recent staffing reductions within the NMFS West Coast Region (WCR), Northwest Fisheries Science Center (NWFSC), and Southwest Fisheries Science Center (SWFSC), as well as across the entire agency of NOAA. In addition, in January of 2024 the Council hosted a committee-of-the-whole meeting to discuss greater alignment between capacity, priorities, and operations. This was done in response to a diminishing fiscal condition within the Council and the fact that staff and many advisory groups were fully or over-subscribed in their workload.

As staffing and available resources have become constrained and declined, concerns have increased regarding the ability of NMFS and Council staff to continue supporting all existing Council processes, analytical schedules, and management activities at historical levels. These discussions have therefore focused on identifying areas where workload, schedules, and management processes may warrant reconsideration or reprioritization in light of available capacity.

The purpose of this document is to support an initial Council discussion regarding potential opportunities to better align workload and available staffing capacity across Fishery Management Plans (FMPs) and the Fishery Ecosystem Plan (FEP). The document identifies a range of concepts and possible approaches discussed by Council and NMFS leadership. These concepts vary considerably in scope and complexity. Some involve relatively modest process or scheduling changes, while others could involve longer-term consideration of management structures, assessment schedules, or FMP amendments.

This document is intended to support discussion and prioritization by the Council. Inclusion of a concept in this document does not imply endorsement by Council or NMFS leadership, nor does it imply that implementation is necessarily appropriate, feasible, or desirable. Many of the concepts identified here would require substantial additional analysis, advisory body review, tribal consultation, stakeholder engagement, legal review, and future Council action before implementation could be considered.

Consistent with the June 2026 situation summary, Council consideration at this meeting is expected to focus primarily on process, prioritization, and identification of topics that may warrant additional development or future discussion. Depending on Council guidance, future work could include additional analysis, scoping, or refinement of concepts for future Council consideration.

## **2. Background**

The West Coast fishery management process depends on coordinated participation and support from Council staff, NMFS management and science staff, tribes, states, advisory bodies, and stakeholders. Over time, the workload associated with supporting this process has increased due to a variety of factors, including increasing analytical complexity, expanded procedural requirements, litigation risk, staff turnover, and growing expectations regarding documentation, public engagement, and transparency.

At the same time, available capacity within the Council and NMFS has become increasingly constrained. In real, inflation adjusted terms, Council budgets have been relatively flat in recent years even while demands have increased. Recent staffing reductions within the WCR, NWFSC, and SWFSC have further reduced the ability of NMFS to support Council activities, stock assessments, regulatory development, and implementation activities at historical levels. While the Council continues to identify important management priorities and work initiatives, the staffing available to support those efforts has become increasingly limited.

Over the past year, Council and NMFS leadership have discussed how management priorities, workload demands, and available capacity can be better aligned. These discussions have focused on identifying areas where management processes, schedules, governance structures, or management approaches may warrant reconsideration in order to ensure that available resources remain focused on the Council's highest priorities and statutory responsibilities.

### **2.1. Capacity Considerations**

Leadership discussions have generally assumed that current capacity constraints are likely to persist for the foreseeable future. While staffing levels and resource availability may change over time, several considerations informed the development of the concepts presented in this document:

- Fishery-independent surveys, monitoring programs, and core data collection activities are expected to continue at or near current levels.
- Available staffing within NMFS science centers may limit the number of stock assessments that can be completed and reviewed annually.
- Additional prioritization and planning processes may be needed to better align assessment schedules with available scientific capacity.
- Available staffing within WCR, General Counsel, and the Council may limit the number of regulatory actions, FMP amendments, and implementation efforts that can be developed simultaneously.
- Greater reliance on frameworking, programmatic approaches, and other administrative efficiencies may help align implementation workload with available capacity.
- Continued examination of Council processes may identify opportunities to reduce recurring workload, duplicative review, or unnecessary process complexity.

## **2.2. Purpose of this Document**

The concepts presented in this document are intended to support Council discussion regarding potential opportunities for aligning management workload with available capacity. They are not intended as recommendations for implementation at this stage and they are not intended to represent a predetermined course of action. The Council will need to make decisions that take capacity constraints into account, but in doing so, the Council will continue to play the lead role in establishing priorities and directing management activities. The concepts in this document are intended to help inform future Council discussions regarding how available resources can best be allocated among competing priorities, management objectives, and statutory responsibilities.

Some of the concepts discussed in this document build upon efforts already underway within the Council process. For example, the Council's recent work regarding stock definitions and stocks in need of conservation and management under the Groundfish FMP has already raised questions regarding the appropriate scope and scale of Federal management in other FMPs. Other concepts reflect preliminary leadership discussions and have not advanced beyond an initial conceptual stage.

The concepts described in this document represent a subset of the possible approaches available to address workload and capacity concerns. In some cases, the Council may determine that existing processes provide sufficient value to justify associated workload demands. In other cases, the Council may determine that additional exploration is warranted because potential workload savings or process improvements justify further consideration.

## **3. Additional Areas for Future Consideration**

Leadership discussions also identified several process and governance topics that may warrant future discussion but are not evaluated in detail in this document.

Examples include:

- approaches to risk management and uncertainty;
- application of sigma and related analytical approaches;
- exempted fishing permit processes;
- Council decision-making and scheduling processes, including the three-meeting process;
- advisory body structure, size, roles, and responsibilities; and
- other operational and administrative aspects of FMP implementation.

Many of these topics are not new to the Council and have previously been discussed through the Committee of the Whole meeting, Council efficiency discussions, and other process-improvement efforts. They are noted here to acknowledge that workload and capacity challenges extend beyond the specific FMP-related concepts discussed in this document and may warrant continued consideration as part of future Council efficiency and capacity-alignment discussions.

#### **4. Organization of This Document and Use by the Council**

The remainder of this document is organized by FMP. Within each section, the document identifies one or more concepts or scenarios that could potentially affect workload, staffing demands, or complexity within the Council process.

For each concept, the document provides preliminary discussion regarding potential implications for:

- data collection and scientific activities;
- analytical workload;
- Scientific and Statistical Committee (SSC) review;
- Council and advisory body workload;
- implementation and rulemaking workload within NMFS WCR, including legal considerations,
- potential industry and stakeholder considerations; and
- Tribal trust responsibilities and treaty obligations.

Each concept also includes an “Initial Leadership Perspective” reflecting preliminary (i.e., not necessarily full consensus) discussions among Council and NMFS leadership regarding whether:

- the concept may warrant additional consideration;
- substantial additional information would likely be needed before further consideration; or
- the concept may not be advisable under current circumstances.

At the June 2026 meeting, the Council may wish to:

- identify topics that warrant additional analysis or development;
- identify topics that should not be pursued further;
- provide guidance regarding prioritization or sequencing;
- request additional information from NMFS, Council staff, or advisory bodies; and/or
- identify topics that may warrant future Council discussion, including possible Committee of the Whole consideration.

To the extent the Council elects to pursue any of the concepts identified in this document, additional analysis, public process, advisory body review, tribal consultation, and future Council action would be necessary before implementation could occur.

#### **5. FMP-by-FMP Scenarios and Options**

##### **5.1. Summary of Potential Workload and Capacity Implications**

The scenarios described in this Section vary substantially in terms of where potential workload reductions or process efficiencies may occur. Some concepts primarily reduce implementation and rulemaking burden within the NMFS WCR, while others primarily affect stock assessment workload, advisory body

engagement, or complexity. In several cases, meaningful long-term workload reductions may require substantial upfront investment in analysis, consultation, rulemaking, or FMP amendments before savings are realized.

The table below is intended to provide a high-level summary of where the most meaningful workload implications may occur across the Council process, and is effectively a summary of the more detailed explanations in each subsection. The table is intended as a screening-level overview and should be interpreted in conjunction with the more detailed discussions provided under each FMP scenario in this Section. In many cases, effects would depend on the specific scope and design of any future action selected by the Council.

The below table also illustrates that relatively few concepts produce significant workload reductions across all components of the Council process simultaneously. Some concepts reduce Council and advisory body workload, while others primarily reduce NMFS implementation or science center analytical workload. In addition, some concepts that may provide meaningful long-term savings could require substantial near-term investment before those savings are realized. As a result, the Council may wish to consider the overall magnitude of potential savings associated with a concept as well as where within the process those savings would occur and the level of effort that implementation would require.

**Preliminary Summary of Potential Workload and Capacity Effects by Office or Process Area (Low/Medium/High reflect qualitative summary of the magnitude of effects)**

*(Low/Medium/High reflect qualitative estimates of the magnitude of potential long-term effects. These ratings are intended to support discussion and do not represent quantitative analyses.)*

Scenario	Data Collection	Analysis	SSC Review	Council Floor Time	Implementation (WCR)	Science Centers	GC & Legal Considerations	US Government Tribal Trust and Treaty Obligations	Upfront Transition Cost	Initial Leadership Perspective
<b>1.a Stock Definitions (Groundfish)</b>	Low	Medium	Low	Medium	Medium	Medium	High	Low	High	Already underway; monitor workload and governance effects as implementation proceeds
<b>1.b.i Eliminate/Modify Shoreside Catch Monitor Requirement</b>	Low	Low/Med	Low	Low/Med	Medium	Low	Medium	Low	Medium	Already scheduled through Trawl Follow-On Actions; further exploration warranted
<b>1.b.ii Streamline Economic Data Collection</b>	Medium	Medium	Low	Low	Low	Medium	Low	Low	Medium	Worth exploring if burden can be reduced while preserving essential information needs

<b>2.a Remove Some CPS Species from Federal Management</b>	High	High	Medium	Medium	High	High	High	Low	High	Potentially significant long-term capacity benefits but substantial legal, policy, and governance considerations
<b>2.b Delegate Management of Some CPS Species to States</b>	Low-Medium	Medium	Medium	Medium	High	Low	High	Low	High	Potentially meaningful Council and WCR workload benefits, but less likely to alleviate Science Center capacity constraints
<b>2.c Single Sardine Stock / Reduced Assessment Frequency for Other CPS</b>	Low	High	Medium	Medium	Medium	High	Medium	Low	Medium	Appears consistent with current management direction and worthy of additional exploration
<b>3. HMS Specification Process Streamlining</b>	Low	Low	Low	Low	Low	Low-Medium	Low	Low	Low	Appears worthy of additional exploration given the international management framework

<b>4. Salmon</b>							Medium-High	High	High	Additional exploration not recommended at this time
<b>5. Ecosystem Governance and Operationalization</b>	Low	Medium	Medium	Med-High	Medium	Low	Low	Low	Medium	Appears worthy of additional exploration; potential governance and prioritization benefits

## **Key Observations**

Several general patterns emerge from the scenarios summarized above. Concepts involving changes to stock definitions, reduced management coverage, or simplified FMP structures generally provide the greatest potential reductions in WCR implementation workload and Council process demands. Concepts involving changes to assessment schedules or ecosystem processes tend to provide more modest but wide reductions in advisory body and meeting workload. Relatively few concepts substantially reduce core science-center survey and assessment workload without corresponding changes to management.

The table also shows that several concepts associated with meaningful long-term workload reductions may require substantial near-term investment in FMP amendments, consultation, analytical development, or rulemaking before those savings are realized. As a result, the Council may wish to consider the scale of potential workload reductions associated with a concept and whether implementation demands are achievable within current staffing constraints.

Other observations include:

- The largest potential long-term reductions in Science Center workload appear to be associated with removal of some CPS species from Federal management, reduced assessment frequency for some CPS stocks, and implementation of recent stock-definition actions.
- Delegation of management responsibility to states may provide meaningful workload benefits for the Council and WCR but is less likely to substantially reduce analytical or assessment-related workload within the Science Centers.
- The largest potential reductions in SSC workload appear to be associated with streamlining and reduced assessment frequency for some CPS stocks.
- The largest potential reductions in recurring Council floor time are generally associated with process-oriented reforms, including HMS specification streamlining, ecosystem governance reforms, and streamlined CPS management approaches.
- Several concepts may provide meaningful workload benefits but also involve substantial legal, policy, and governance considerations, particularly stock definitions, removal of species from Federal management, and delegation of management authority to states.
- Tribal trust and treaty considerations vary substantially across scenarios and are particularly important in the context of salmon management and any actions that could affect tribal fishing rights, consultation obligations, or treaty resources.
- Salmon management was reviewed during leadership discussions but is not presently considered sufficiently developed to warrant further Council exploration.
- Ecosystem recommendations are intended primarily to improve governance, prioritization, and implementation rather than reduce scientific effort, although process efficiencies are expected. Of note, the most substantial effects of ecosystem process modifications do not readily show up in the summary table as they are related to coordination, staff workload, and related matters.

## **5.2. GROUND FISH**

### **Scenario 1.a: Stock Definitions**

The Council has already taken action related to groundfish stock definitions and stocks in need of conservation and management through a process completed between 2025 and 2026. These actions included adoption of revised stock definitions for several species, identification of stocks to be managed within complexes, designation of certain species as Ecosystem Component (EC) species, and removal of some species from Federal management. The Council also identified additional follow-on work related to stock complexes and other details related to implementation.

Because the Council has already taken action on much of this work, the purpose of including this section here in this document is to summarize the anticipated workload and process implications associated with this action.

The largest anticipated workload reductions associated with the groundfish stock definitions action are expected to occur within NMFS implementation and management processes, particularly through reductions in the number of stocks requiring routine harvest specifications, rebuilding analyses, management tracking, and associated rulemaking activities. Additional efficiencies may occur within the scheduling of Council process, prioritization of stock assessments, and advisory body workload due to a smaller pool of actively managed stocks requiring attention.

However, implementation of the stock definitions action will require continued near-term work by Council staff, NMFS, and advisory bodies. Remaining implementation tasks include refinement of stock complexes, development of monitoring approaches for some stocks managed within complexes or as EC species, and incorporation of these changes into future processes. As a result, while long-term workload reductions are anticipated, some near-term implementation workload remains ongoing.

## **Impact Assessment**

<b>Process Area</b>	<b>Preliminary Workload Implications</b>
Data Collection	No major near-term reduction in core survey workload anticipated. Survey and monitoring programs continue to support indicator stocks, complexes, and ecosystem monitoring needs.
Analysis	Reduced number of actively managed stocks expected to simplify future harvest specification cycles, stock assessment prioritization, ACL updates, rebuilding analyses, and EFH-related analytical workload. Additional opportunities for capacity savings could be realized by setting new criteria/triggers that would limit unexpected benchmark reviews. Some additional analytical work required during transition and implementation phase.

SSC Review	Smaller pool of actively managed stocks may streamline future assessment prioritization and SSC review workload related to specifications.
Council Floor Time	Reduced time anticipated for future stock assessment prioritization discussions and management specification processes. Some implementation-related workload remains in the near term.
Implementation (WCR)	Significant long-term workload reductions anticipated through fewer actively managed stocks, fewer rebuilding requirements, reduced specification updates, fewer management measure changes, and simplified rulemaking workload.
GC & Legal Considerations	Some implementation and FMP amendment workload remains ongoing. Legal and administrative complexity reduced for stocks removed from active Federal management.
US Government Tribal Trust and Treaty Obligations	Low. There are a limited number of Tribes affected by these proposals. Consultation with tribes is required to ensure proposals to make adjustments within this FMP fully incorporate considerations as they pertain to the US Governments Trust and Treaty obligations.
Upfront Transition Cost	High. Significant Council, NMFS, analytical, and implementation effort already expended; additional implementation work remains ongoing.
Initial Leadership Perspective	Action substantially underway. Remaining work should focus on implementation, refinement of stock complexes and monitoring approaches, and realization of anticipated process efficiencies over time.

### **Key Considerations**

The workload and process implications associated with the Council’s stock definition actions are expected to emerge over time as implementation occurs through the next few management cycles. Many of the anticipated efficiencies depend upon how stock complexes, indicator approaches, and EC species monitoring are operationalized within future Council processes.

Leadership discussions also noted that this effort illustrates the challenge underlying the present workload and capacity discussion. That is, long-term efficiencies may require significant upfront investment in Council process, analysis, consultation, and implementation before operational savings are realized. In this case, much of that transition workload has already occurred or is currently underway through the Council’s completed groundfish stock definition actions.

**Scenario 1.b.i: Trawl Rationalization Follow-On Actions — Shoreside Catch Monitoring Requirements**

The Council has already identified a series of “trawl follow-on actions” for future consideration as part of its ongoing oversight of the trawl rationalization program. These follow-on actions include a range of potential regulatory, monitoring, and administrative refinements intended to improve program operation and address issues identified through implementation experience. Consideration of shoreside catch monitoring requirements is included among these previously identified priorities and is therefore already anticipated within the Council’s future work schedule.

This scenario is included in the present document because it may also have implications for workload and staffing capacity across portions of the Council process and NMFS implementation framework. Changes to shoreside catch monitoring requirements could potentially reduce some administrative, data-processing, and implementation workload associated with catch monitor certification, data management, and program oversight. Such changes may also reduce monitoring costs borne by industry participants. The magnitude of any such workload reductions would depend on the specific monitoring approach selected by the Council and the extent to which existing monitoring responsibilities are modified.

At the same time, any changes to monitoring requirements would require careful consideration of implications for catch accounting, observer coverage, enforcement, data quality, and the overall objectives of the trawl rationalization program. As a result, this issue is expected to continue through the Council’s existing trawl follow-on process rather than as a stand-alone workload reduction initiative.

**Impact Assessment**

<b>Process Area</b>	<b>Preliminary Workload Implications</b>
Data Collection	Potential reduction in shoreside monitoring data collection and associated administrative processing depending on monitoring alternatives selected.
Analysis	Limited direct analytical savings anticipated. Some reduction in routine data management and monitoring oversight workload possible.

SSC Review	Limited impact anticipated.
Council Floor Time	Already scheduled within existing trawl follow-on process. Additional Council workload not anticipated beyond currently planned discussions.
Implementation (WCR)	Potential reduction in monitoring program oversight, certification, and administrative workload depending on final program structure.
GC & Legal Considerations	Regulatory modifications and implementation review required.
US Government Tribal Trust and Treaty Obligations	Low. There are a limited number of Tribes affected by these proposals. Consultation with tribes is required to ensure proposals to make adjustments within this FMP fully incorporate considerations as they pertain to the US Governments Trust and Treaty obligations.
Upfront Transition Cost	Moderate. Rulemaking, implementation planning, and stakeholder engagement would be required.
Initial Leadership Perspective	Appropriate to continue through the Council's existing trawl follow-on process. Potential workload and implementation savings warrant additional evaluation as alternatives are developed.

### **Key Considerations**

Potential workload reductions associated with this scenario are expected to occur primarily within the administration of monitoring systems and implementation processes. The scale of any savings would depend heavily on the specific alternatives considered by the Council and whether modifications affect only industry monitoring costs or also reduce NMFS administrative and oversight responsibilities.

Leadership discussions also noted that this scenario differs from some other concepts discussed in this document because the Council has already identified the issue as a priority for future consideration independent of the current workload-capacity discussion. The present discussion therefore focuses

primarily on whether future trawl follow-on actions may also provide opportunities to improve workload alignment.

### **Scenario 1.b.ii: Trawl Rationalization Follow-On Actions — Economic Data Collection (EDC)**

The Council has also identified review of the trawl rationalization Economic Data Collection (EDC) program as a potential future trawl follow-on action. Although this issue has not been identified as one of the highest-priority trawl follow-on items, concerns have been raised regarding the complexity and burden associated with EDC reporting requirements and whether all currently collected information remains necessary to support management needs.

In particular, members of the Groundfish Advisory Subpanel (GAP) and industry participants have expressed concern that portions of the EDC program are administratively burdensome and time-consuming for participants to complete. At the same time, the EDC program provides important information regarding the economic performance and financial condition of the trawl sector. These data have informed program reviews, economic analyses, and Council understanding regarding the economic performance of the fishery.

It is important to note that this scenario does not contemplate an elimination of the economic data collection program, but instead focuses on whether opportunities exist to streamline reporting requirements, reduce reporting frequency, refine data elements collected, or otherwise improve efficiency/workload while preserving the analytical and management value of the data collection program. In addition to reducing reporting burden on industry participants, it is possible that some streamlining measures could reduce portions of the analytical, processing, and administrative workload associated with the EDC program within the science centers and Council process.

### **Impact Assessment**

<b>Process Area</b>	<b>Preliminary Workload Implications</b>
Data Collection	Potential reduction in reporting burden and data-processing workload depending on reporting frequency and scope.
Analysis	Some reduction in data management and analytical workload possible if reporting requirements or reporting frequency are reduced.
SSC Review	Limited impact anticipated.

Council Floor Time	Minimal additional Council workload anticipated if addressed within broader trawl follow-on discussions.
Implementation (WCR)	Limited implementation savings anticipated.
Science Centers	Potential reduction in data management, quality control, and economic analysis workload depending on scope of program modifications.
GC & Legal Considerations	Regulatory modifications may be required depending on changes pursued.
US Government Tribal Trust and Treaty Obligations	Low. There are a limited number of Tribes affected by these proposals. Consultation with tribes is required to ensure proposals to make adjustments within this FMP fully incorporate considerations as they pertain to the US Governments Trust and Treaty obligations.
Upfront Transition Cost	Low to Moderate. Additional review would be needed to determine which reporting elements remain necessary to support statutory and management objectives.
Initial Leadership Perspective	May warrant additional exploration as part of broader trawl follow-on discussions, particularly where opportunities exist to reduce reporting burden and associated processing workload while preserving core economic information needs.

### **Key Considerations**

Leadership discussions emphasized that the EDC program provides important information regarding the economic performance of the trawl rationalization program and that maintaining an adequate understanding of fishery economics remains important for management, program review, and evaluation purposes. As a result, discussions focused primarily on opportunities for refinement and streamlining rather than elimination of the program.

Potential workload reductions associated with this scenario are also expected to be more modest than some other concepts discussed in this document. However, because portions of the EDC workload occur within already constrained science-center capacity, even incremental reductions in data-processing, quality-control, and reporting workload may provide some operational benefit if modifications can be accomplished without substantially reducing the utility of the resulting information.

### **5.3. Coastal Pelagic Species**

The Coastal Pelagic Species (CPS) FMP differs from many other Council-managed fisheries in several important respects. These differences may create opportunities to better align management responsibilities, statutory obligations, and available capacity while continuing to achieve conservation and management objectives.

Unlike some Council-managed fisheries, several CPS stocks support little or no directed fishing activity, some species are exempt from annual catch limit requirements due to their life-history characteristics, and management of some fisheries already relies heavily on state management frameworks. In addition, the Council is currently considering a transition to a single coastwide Pacific sardine stock and, in practice, has already reduced the frequency of stock assessments for several CPS stocks in response to management needs and available scientific capacity.

Taken together, these characteristics suggest there may be opportunities to better align management processes with the level of management need associated with particular CPS stocks. These opportunities range from evaluating whether some species continue to require Federal management, to considering whether management responsibilities for some fisheries could be delegated to states, to further streamlining stock assessment and harvest specification processes for species that remain under Federal management.

The concepts described below represent distinct approaches with differing implications for Council workload, NMFS implementation responsibilities, scientific capacity, and legal considerations. Some concepts could provide substantial long-term workload benefits but would require significant policy development and legal review. Others may offer more modest but readily achievable improvements through adjustments to existing management processes.

#### **Scenario 2.a Remove Some CPS Species from Federal Management**

Some CPS species may warrant evaluation regarding whether continued Federal management remains necessary to achieve conservation and management objectives. In particular, species that support little or no directed fishing activity, have limited Federal management needs, or are otherwise managed primarily through state processes may present opportunities for reconsideration of the appropriate scope of Federal management.

Removal of a species from the CPS FMP would likely provide the greatest potential long-term workload reductions among the CPS-related concepts considered in this document. Depending on the species involved, such an approach could reduce future stock assessment demands, SSC review requirements, Council workload, regulatory development, implementation responsibilities, and associated administrative processes.

At the same time, removal of species from Federal management raises important legal, policy, and governance considerations. Recent Council discussions regarding stock definitions and stocks in need of conservation and management under the Groundfish FMP illustrate the complexity and stakeholder interest that can accompany decisions regarding the scope of Federal management authority. Similar considerations would likely arise in the CPS context and would require careful evaluation prior to any Council action.

For these reasons, this concept appears worthy of additional exploration but would likely require substantial analysis, stakeholder engagement, and legal review before any recommendations could be developed.

### **Initial Leadership Perspective**

This concept appears to offer potentially significant long-term workload and capacity benefits across multiple components of the fishery management system, including the Council, WCR, Science Centers, SSC, and implementation processes. However, those benefits would need to be weighed against potentially significant legal, policy, and governance considerations.

### **Impact Assessment**

<b>Process Area</b>	<b>Preliminary Workload Implications</b>
Data Collection	Moderate reduction possible depending on species removed
Analysis	Significant reduction possible
SSC Review	Moderate reduction possible
Council Floor Time	Moderate reduction possible
Implementation (WCR)	Significant reduction possible
Science Centers	Significant reduction possible
General Counsel & Legal Review	Significant legal and policy considerations

Tribal Trust & Treaty Obligations      No significant concerns identified at this time

Upfront Transition Cost                      High

### **Scenario 2.b Delegate Management of Some CPS Species to States**

As an alternative to removal from Federal management, the Council could explore whether management responsibilities for some CPS fisheries could be delegated to states while retaining an overall Federal management framework.

Under this approach, species would remain managed under the CPS FMP, but day-to-day management responsibilities for particular fisheries could be delegated to state agencies through mechanisms established under Federal law and regulation. Depending on the specific structure adopted, delegation could reduce recurring Council workload, regulatory development demands, and implementation responsibilities within WCR while preserving a Federal management role.

Compared to complete removal from Federal management, delegation would likely provide more limited benefits to scientific capacity. Stock assessments, scientific monitoring, Federal oversight responsibilities, and other supporting activities may still be required, resulting in comparatively smaller workload reductions for the Science Centers and SSC.

Like removal from Federal management, delegation raises important governance and legal considerations regarding management authority, accountability, consistency among states, and Federal oversight responsibilities. These issues would require substantial exploration before any specific approach could be developed.

### **Initial Leadership Perspective**

This concept may provide meaningful workload and capacity benefits for the Council and WCR while preserving a Federal management framework. However, because scientific support and Federal oversight responsibilities would likely continue, delegation is less likely than complete removal from Federal management to alleviate capacity constraints within the Science Centers.

### **Impact Assessment**

#### **Process Area**

#### **Preliminary Workload Implications**

Data Collection

Little change anticipated

Analysis	Moderate reduction possible
SSC Review	Moderate reduction possible
Council Floor Time	Moderate reduction possible
Implementation (WCR)	Significant reduction possible
Science Centers	Limited reduction anticipated
General Counsel & Legal Review	Significant legal and governance considerations
Tribal Trust & Treaty Obligations	No significant concerns identified at this time
Upfront Transition Cost	High

**Scenario 2.c Streamline CPS FMP: Single Sardine Stock and Reduced Assessment Frequency for Other CPS Stocks**

The Council is currently considering a transition to a single coastwide Pacific sardine stock, reflecting ongoing scientific work regarding stock structure and management. At the same time, the Council has already reduced the frequency of stock assessments for several CPS stocks in practice, reflecting both management needs and available scientific capacity.

Building on these efforts, additional opportunities may exist to further align assessment schedules, harvest specification processes, and management review requirements with the characteristics and management needs of particular CPS stocks. Such approaches could help focus scientific and management resources on the stocks and decisions that most directly affect management outcomes while maintaining appropriate conservation safeguards.

Potential benefits could include reduced assessment workload, fewer SSC review requirements, and reduced recurring Council workload associated with harvest specification processes. Depending on the specific approach considered, such changes may also help align future scientific workloads with available capacity at the Science Centers.

**Initial Leadership Perspective**

This concept appears generally consistent with current Council discussions regarding sardine stock structure and recent practices regarding assessment scheduling for other CPS stocks. Additional exploration may be warranted to determine whether further opportunities exist to align assessment and specification processes with management needs while continuing to meet FMP objectives and statutory requirements.

**Impact Assessment**

<b>Process Area</b>	<b>Preliminary Workload Implications</b>
Data Collection	Little change anticipated
Analysis	Significant reduction possible through reduced assessment frequency
SSC Review	Moderate reduction possible
Council Floor Time	Moderate reduction possible
Implementation (WCR)	Moderate reduction possible
Science Centers	Significant reduction possible
General Counsel & Legal Review	Limited concerns anticipated
Tribal Trust & Treaty Obligations	No significant concerns identified at this time
Upfront Transition Cost	Moderate

**Relationship Among CPS Scenarios**

These three scenarios represent distinct approaches rather than alternatives that must be considered together. Scenario 2.a focuses on the scope of Federal management and whether certain species continue to

warrant inclusion in the CPS FMP. Scenario 2.b focuses on whether management responsibilities for certain species could be delegated to states while retaining a Federal management framework. Scenario 2.c focuses on streamlining management processes for species that remain federally managed. The Council could choose to further explore any one of these concepts independently or in combination with others.

#### **5.4. HIGHLY MIGRATORY SPECIES**

##### **Scenario 3. Specification Process Streamlining**

Management under the Highly Migratory Species (HMS) FMP differs from management under most other Council FMPs because harvest specifications for the principal managed species are largely established and agreed to through regional fisheries management organizations and implemented through the Tuna Conventions Act (TCA). For many HMS stocks, the Council does not determine annual harvest limits or other primary conservation measures through a domestic specification-setting process. Instead, those measures are developed through international negotiations and subsequently implemented through Federal management processes under the TCA.

As a result, leadership discussions focused on whether the Council's recurring HMS specification process continues to provide sufficient management value relative to the staff and analytical resources required to support it. While the Council retains important responsibilities related to domestic management measures, fishery performance, bycatch management, and implementation of international conservation measures, the recurring process of reviewing and recommending harvest specifications may provide limited opportunity for the Council to influence the underlying management outcomes.

Leadership discussions therefore considered a more streamlined HMS management framework built around three related concepts.

- First, the Council could discontinue routine harvest specification recommendations for HMS stocks where specifications are established through international agreements or treaties. Under this approach, international conservation measures would continue to be implemented domestically as required, but the Council would no longer conduct a separate specification-setting process for those stocks.
- Second, routine SSC review associated with HMS harvest specifications could likewise be reduced or eliminated where the Council is not responsible for determining the underlying specifications. SSC review would remain available when specific scientific questions, stock status concerns, or management issues require Council consideration.
- Third, HMS management could shift toward a trigger-based process in which Council review occurs when management action is needed rather than as part of a recurring specification cycle. Potential triggers could include:
  - changes to international conservation measures;
  - stock status determinations requiring domestic response;
  - emerging bycatch or protected species concerns;
  - implementation of new domestic management measures;
  - exempted fishing permit proposals; or

- other management issues identified by the Council, NMFS, or advisory bodies.

Under this approach, Council and NMFS resources currently devoted to recurring specification processes could be redirected toward management issues where Council action is more likely to affect management outcomes.

### **Impact Assessment**

<b>Process Area</b>	<b>Preliminary Workload Implications</b>
Data Collection	No significant changes anticipated. Existing monitoring and reporting programs would continue.
Analysis	Reduction in recurring analytical workload associated with preparation of specification documents and supporting analyses.
SSC Review	Elimination of routine harvest specification review workload. SSC involvement would occur when specific scientific or management questions arise.
Council Floor Time	Reduction in recurring HMS agenda workload associated with specification review and adoption.
Implementation (WCR)	Limited direct savings. Domestic implementation of international measures would continue.
Science Centers	Modest reduction in recurring analyses and briefing materials. Core monitoring and assessment responsibilities would remain.
GC & Legal Considerations	Limited concerns identified. International obligations and domestic management authorities would remain unchanged.
US Government Tribal Trust and Treaty Obligations	Low. There are a limited number of Tribes affected by these proposals. Consultation with tribes is required to ensure proposals to make adjustments within this FMP fully incorporate considerations as they pertain to the US Governments Trust and Treaty obligations.
Upfront Transition Cost	Low. Changes would primarily involve modifications to Council process and scheduling practices.

Initial Leadership Perspective      Appears worthy of additional exploration. Because harvest specifications are largely established through international processes, HMS management may present an opportunity to reduce recurring Council, SSC, and staff workload while maintaining the Council's ability to address domestic management issues as they arise.

## **Key Considerations**

Leadership discussions emphasized that this concept would not reduce the Council's authority over HMS management nor affect the United States' obligations under international agreements. Rather, the objective would be to better align Council processes with the management decisions that the Council is positioned to influence.

Discussions also noted that HMS fisheries already differ substantially from many other Council-managed fisheries because international processes establish many of the primary conservation and harvest measures. As a result, reducing or eliminating recurring specification reviews may provide an opportunity to achieve modest but meaningful workload savings for the Council, SSC, NMFS West Coast Region, and supporting science-center staff while preserving the Council's ability to respond to management concerns when they arise.

## **5.5. Salmon**

### **Scenario 4: Salmon considerations**

Leadership discussions regarding potential workload alignment opportunities within the Salmon Fishery Management Plan (FMP) identified several areas where management processes, regulatory structures, or specification frameworks could potentially be simplified over the long term. These discussions included consideration of whether some stocks currently included in the Salmon FMP continue to require the same level of Federal management as they do today, whether portions of the annual management cycle could be streamlined or codified, and whether additional frameworking approaches could reduce recurring workload. However, leadership discussions also concluded that the Council and NMFS are not currently positioned to proceed with active exploration or development of major salmon management changes at this time.

Salmon management on the West Coast involves unique treaty- trust, and co-management considerations that differ substantially from many of the Council-managed fisheries and from other Councils in the country. The anadromous life history and extensive migrations of West Coast salmon stocks cross multiple management jurisdictions such that coordinated planning processes are essential for West Coast salmon fisheries. Long-term management agreements between the States and Tribes, as well as between the US and Canada, provide the frameworks for these fisheries. Council area salmon fisheries are one piece of that framework and must be tightly coordinated with the other management forums to ensure conservation and sharing obligations are met.

Foundational to coastwide salmon management are the obligations established in case law under U.S. v. OR and U.S. v. WA that specify the northwest tribes are entitled to 50% of the harvestable fish on a river

by river, run by run basis and the meaningful exercise of treaty rights. A similar provision applies to salmon stocks in the Klamath River in California. That obligation requires the federal, state and tribal parties to manage salmon fisheries each year to ensure fair sharing of the resource consistent with case law and that conservation objectives are met to ensure fisheries are sustainable into the future. With few exceptions, the salmon stocks in the Salmon FMP are subject to extensive co-management to meet these obligations and scientific support to ensure information is based on the best scientific information available. Importantly, federal agencies are required to conduct government to government discussions with tribes on federal actions that affect treaty trust resources and to harmonize the federal trust responsibility to tribes, tribal sovereignty, and statutory missions of the federal agencies, including NMFS, that strives to ensure that Indian tribes do not bear a disproportionate burden of conservation.

Leadership discussions emphasized that meaningful tribal consultation would need to occur early and throughout any exploration of potential changes to salmon management structure, specification processes, or stock definitions. Those discussions have not occurred.

Additionally, while concepts such as codification of recurring management measures may appear to offer opportunities for efficiencies, leadership discussions noted that much additional analysis would be needed to determine whether such approaches would reduce overall workload once consultation, review, and implementation requirements are considered. Similarly, potential changes to stock definitions or management structure could raise significant policy and legal questions that would require extensive additional review before the Council could evaluate potential tradeoffs.

As a result, leadership concluded that the Council and NMFS are not currently positioned to pursue Salmon FMP streamlining or restructuring initiatives as part of the present workload-capacity alignment effort. At this stage, there is insufficient information regarding tribal perspectives, internal NMFS considerations, legal implications, and operational feasibility to support development of proposals or recommendations.

However, NMFS leadership has indicated interest in continuing internal exploration of whether opportunities exist to improve efficiency, streamline implementation processes, or align salmon management workload with available capacity over the longer term. To the extent additional information, concepts, or operational opportunities are identified through those internal discussions, NMFS could report back to the Council at a future date for additional discussion and consideration.

### **Initial Leadership Perspective**

Additional exploration of Salmon FMP restructuring or streamlining measures is not recommended at this time. Further internal NMFS coordination and meaningful tribal consultation would be necessary before the Council could evaluate whether potential management or regulatory changes are feasible, appropriate, or likely to produce meaningful workload alignment.

## **5.6. Ecosystem**

### **Scenario 5.a: A more disciplined approach to EBFM implementation**

The Council has made substantial investments in ecosystem-based fishery management (EBFM) through development of the Fishery Ecosystem Plan (FEP), the Ecosystem Workgroup (EWG), the Ecosystem

Advisory Subpanel (EAS), the annual Ecosystem Status Report (ESR), and associated ecosystem initiatives. These efforts have established an important scientific and institutional foundation for ecosystem-oriented fishery management on the West Coast and are consistent with NOAA guidance encouraging integration of ecosystem considerations into fishery management processes.

Leadership discussions noted that recent experience suggests ecosystem initiatives can generate significant analytical and procedural workload without producing significant management outcomes. As the Council and NMFS continue to face substantial staffing and workload constraints, leadership discussions focused on whether a more disciplined approach may be necessary to ensure ecosystem initiatives support fishery management responsibilities within existing constraints.

The Council benefits from strong ecosystem science through the SSC, science centers, advisory bodies, and others. A more disciplined approach as discussed by leadership would involve the integration of this science into our prioritization and operationalization processes.

Discussions consistently framed the objective as how the Council can better operationalize EBFM within existing statutory, workload, and implementation constraints. Leadership discussions also emphasized that the intent is to build upon the substantial ecosystem foundation already established by the Council.

Several overarching issues were identified during leadership discussions:

- ecosystem initiatives sometimes proceed without sufficiently defined objectives;
- ecosystem workstreams can evolve into substantial analytical efforts without clear linkage to specific fishery management decisions;
- responsibility for implementation of ecosystem recommendations is often unclear;
- ecosystem initiatives may involve overlapping responsibilities among the ecosystem advisory bodies, FMP advisory bodies, SSC, and Council staff, raising issues of unclear roles and responsibilities;
- ecosystem discussions can create recurring meetings and reviews without clear end points; and
- ecosystem initiatives may at times operate parallel to, rather than integrated within, FMP management processes.

Leadership discussions therefore focused on the need to establish clearer entry points, objectives, roles and responsibilities, and processes for future ecosystem initiatives as a way to achieve greater discipline in the implementation of EBFM.

### **Clarify Purpose and Scope**

Leadership discussions emphasized that future ecosystem initiatives should begin with clearly defined fishery management problem statements approved by the Council before substantial analytical work proceeds. These problem statements could identify:

- the specific management concern or risk;
- the fisheries or FMPs affected;
- the management or policy decisions potentially affected;
- anticipated outcomes;
- the consequences of inaction; and

- the Council body, management team, or agency component responsible for implementation follow-through.

Discussions noted that this sort of planning is typical for FMP or regulatory amendments as part of internal Council project management. Clearer problem definition and clearer assignment of responsibility may help ensure ecosystem initiatives remain connected to identifiable management needs and reduce the likelihood of open-ended workstreams without clear implementation plans and/or ownership.

Leadership discussions also noted that ecosystem initiatives lacking sufficiently defined management applications, lead responsibilities, or implementation plans may be more appropriately treated as “strategic planning” or science-development activities.

### **Differentiate Strategic Ecosystem Planning from Management Actions**

With the above considerations in mind, leadership discussions identified a need to more clearly distinguish between:

1. strategic ecosystem planning activities; and
2. ecosystem initiatives intended to produce changes to management or policy.

Under this approach, strategic planning efforts related to EBFM would focus on long-term ecosystem understanding, emerging risks, scenario planning, and scientific development without necessarily implying future regulatory action or implementation. Responsibility for these efforts would remain primarily with the science centers and the ecosystem advisory bodies.

By contrast, ecosystem initiatives intended to modify management processes, amend FMPs, establish risk policies, or affect management decisions would be treated as a formal management action that would require normal planning procedures, such as:

- explicit Council prioritization relative to other management obligations;
- clearly assigned lead bodies;
- implementation schedules;
- workload estimates;
- coordination with affected FMP teams; and
- NMFS review.

Leadership discussions emphasized that this distinction could help reduce workload ambiguity and avoid situations where exploratory ecosystem discussions gradually evolve into de facto management workstreams without explicit Council direction, implementation plans, or workload prioritization and accountability.

### **Prioritize Solution-Oriented EBFM**

Leadership discussions consistently emphasized that ecosystem initiatives are most likely to provide meaningful input to Council decision making, while also helping ensure discipline, if they are focused on addressing and improving fishery management challenges and performance.

Example topics discussed by leadership include work that:

- improves harvest specification decisions;
- informs risk management and uncertainty buffers;
- addresses climate-driven stock distribution changes;
- improves treatment of nonstationary productivity;
- supports bycatch management;
- informs community resilience discussions.

By contrast, discussions noted that ecosystem initiatives primarily producing conceptual discussion or exploratory analysis without identifiable management application, implementation responsibility, or decision pathway may warrant lower prioritization within current staffing constraints (though these may be higher priorities for some partner institutions).

### **Impact Assessment**

<b>Process Area</b>	<b>Preliminary Workload Implications</b>
Data Collection	No major changes anticipated for core ecosystem monitoring or ecosystem science activities.
Analysis	Potential improvement in prioritization and targeting of ecosystem analyses toward management-relevant questions and clearly assigned implementation needs.
SSC Review	Potential reduction in ecosystem initiative review and associated workload through clearer organization and prioritization.
Council Floor Time	Potential reduction in recurring workload through more targeted, implementation-oriented ecosystem initiatives with clearer ownership and endpoints.
Implementation (WCR)	Improved efficiency possible through clearer linkage between ecosystem information, implementation responsibility, and actionable management processes.
Science Centers	Limited reduction in core ecosystem science workload anticipated; possible improvement in prioritization and alignment with management.
GC & Legal Considerations	No major concerns identified at this stage.

US Government Tribal Trust and Treaty Obligations	Regular Tribal consultation is required to ensure proposals to make adjustments within this FMP fully incorporate considerations as they pertain to the US Governments Trust and Treaty obligations.
Upfront Transition Cost	Moderate. Additional organizational clarification, possible process refinements, and advisory body coordination.
Initial Leadership Perspective	Appears worthy of additional exploration. A more disciplined and implementation-oriented EBFM framework — with clearer organization, defined responsibilities, and stronger integration into existing FMP processes — may improve both operational integration and workload sustainability within existing Council and NMFS capacity constraints.

### **Key Considerations**

Leadership discussions emphasized that ecosystem-based fishery management is likely to be most effective when ecosystem science is directly connected to identifiable management questions, implementation pathways, responsible bodies, and decision-making processes.

Discussions also noted that ecosystem initiatives should be evaluated for policy and management importance, as well as operational feasibility, organizational clarity, implementation responsibility, and workload sustainability within existing Council and NMFS staffing constraints.

Leadership discussions suggested that the Council may obtain greater long-term EBFM value by aligning ecosystem considerations with fishery management challenges and improvements — with clearly assigned implementation responsibilities and planning — rather than continuing a parallel structure which risks expansion in scope.

## **6. Next Steps**

The Council's consideration of these options at the June 2026 meeting represents a milestone in an ongoing discussion regarding alignment of Council priorities, management processes, and available capacity across the Council, NMFS West Coast Region, Northwest Fisheries Science Center, Southwest Fisheries Science Center, and Council advisory bodies.

The options described in this document are intended to support discussion and prioritization, as opposed to being recommendations for implementation. In other words, the options presented here are examples of areas where leadership discussions identified potential opportunities to better align management processes and workload demands with available staffing and resources while continuing to meet statutory obligations and management objectives.

Consistent with the process outlined in the June 2026 Situation Summary, the Council's primary task at this meeting is to consider whether further exploration of any of these concepts is warranted and, if so, which concepts should receive priority consideration moving forward.

Potential Council direction could include:

- identifying specific concepts for further analysis;
- identifying concepts that should not be pursued further;
- requesting additional information regarding workload, legal, management, or implementation implications;
- requesting NMFS analysis or feasibility assessments.

Should the Council choose to pursue further exploration of one or more concepts, subsequent work would occur through normal Council processes and schedules, which may entail:

- Future Council Efficiencies agenda items;
- Scoping for FMP amendments; or
- Consideration of changes to COPs or the Regional Operating Agreement.

In either case, and depending upon the topic, future work may include development of more detailed analyses, workload assessments, implementation plans, legal reviews, stakeholder engagement, tribal consultation, advisory body review, or consideration of alternatives. Future Council action would occur only after such information has been developed and brought forward for consideration.

Leadership discussions have also recognized that the concepts described in this document differ substantially in complexity, workload implications, legal considerations, and implementation requirements. Some concepts involve management actions or process improvements already underway, while others would require significant additional analysis, consultation, and Council consideration before any action could be contemplated. As a result, prioritization may be as important as identification of potential opportunities.

The Council's discussion at this meeting is therefore expected to help inform future workload and efficiency discussions, establish priorities for additional exploration, and provide direction regarding how the Council wishes to approach alignment of management responsibilities and available capacity moving forward.

*Disclaimer: Generative A.I. was used to synthesize and summarize notes taken during leadership meetings and to generate initial narrative text describing internal meeting outcomes. Those initial narratives have been refined, edited, and substantially overwritten throughout several document reviews by the authors. The authors take full responsibility for the paper's contents.*