

SUMMARY OF POTENTIAL EFFICIENCIES RAISED UNDER ADAPTIVE
MANAGEMENT AND FLEXIBILITY

In September 2025, under the Adaptive Management and Flexibility agenda item, the Council requested that the Executive Director explore and identify other opportunities outlined in [Agenda Item H.1, Attachment 1, September 2025](#) to increase procedural efficiencies as part of ongoing work under other initiatives, as appropriate. Below is a summary of those ideas, including a reference to the section of the document where the concept is described. Staff intend to scope these items further and report back at a future Council meeting.

Topic	Description	Primary Reference a/
Council process	Consider reducing the number of meetings required in the Fishery Management Plan (FMP) and/or Council Operating Procedure for select Council actions	Pages 8-9
Ensure adequate scoping	Establish a clear, well-defined Purpose and Need statement/problem statement with broad Council support	Pages 7-9, 23-25
Frontloading	Evaluate whether additional frontloading could be accomplished to support faster implementation of recommendations	Pages 24-25
Reduce time between final action and transmittal	Evaluate the root causes for the delays, propose solutions	Pages 24-25
Continuous Improvement Framework	Develop framework that supports prioritization of actions, identification of tools/approaches, and evaluation of selected tools/approaches	Pages 13-15
Programmatic National Environmental Policy Act (NEPA) documents	Evaluate efficiencies gained by expanded use of programmatic NEPA docs	Page 31-32

a/ See [Agenda Item H.1, Attachment 1, September 2025](#)

Appendix A – Meeting Requirements by FMP (excerpt from [Agenda Item H.1, Attachment 1, September 2025](#))

Coastal Pelagic Species

Types of Actions and Procedures:

- Management measures may be imposed, adjusted, or removed at any time during the year. Management measures may be imposed for resource conservation, social, or economic reasons consistent with FMP procedures, goals, and objectives.
- Categories of management actions:
 - Automatic actions – no notice and comment; **no Council meetings** (for actions that are non-discretionary and where the impacts have previously been taken into account).
 - Notice actions – require **at least one Council meeting** and one Federal Register notice (these include all management actions other than automatic actions that are either non-discretionary or have probable impacts that have been previously analyzed).
 - Abbreviated rulemaking actions – normally require **at least two Council meetings** and one Federal Register rule (these include all management actions intended to have permanent effect and be discretionary in nature with impacts that have not been previously analyzed).
 - Full rulemaking actions – normally require **at least two Council meetings** and two Federal Register rules; usually used for highly controversial management measures (these include any highly controversial management measure).

Routine Management Measures:

- Once a management measure has been classified as routine through the abbreviated or full rulemaking procedures, it may be modified thereafter through the **single meeting** notice procedure if (1) modification is proposed for the same purpose as the original measure; and (2) impacts of the modification are within the scope of the impacts analyzed when the measure was originally classified as routine.

Groundfish

General Procedures for Establishing and Adjusting Management Measures

- Management measures are normally imposed, adjusted, or removed at the beginning of the biennial fishing period, but may, if the Council determines it necessary, be imposed, adjusted, or removed at any time during the period. Management measures may be imposed for habitat protection, resource conservation, or social or economic reasons consistent with the criteria, procedures, goals, and objectives set forth in the FMP.
- Categories of management actions:
 - Automatic actions – no notice and comment; **no Council meetings** (these actions are nondiscretionary, and the impacts must be reasonably accountable, based on previous application of the action or past analysis).
 - Notice actions requiring one Federal Register notice – may be recommended at **one Council meeting** or by NMFS outside of a Council meeting for certain actions (these include all management actions other than automatic actions; may be nondiscretionary; may be actions for which the scope of probable impacts has been previously analyzed).

- Management measures rulemaking for actions developed through three-meeting biennial specifications process – **three Council meetings** and two Federal register notices (these include (1) management measures to be classified as routine the first time these measures are used; or (2) adjustments to measures previously classified as routine, such as trip limits that vary by gear type, closed seasons or areas, and in the recreational fishery, bag limits, size limits, time/area closures, boat limits, hook limits, and dressing requirements or (3) new management measures, which are those management measures where the impacts have not been previously analyzed and/or have not been previously implemented in regulations).
- Full rulemaking actions – normally require **two Council meetings** and two Federal Register rules (these include any proposed new management measures to be classified as routine, including those considered highly controversial, or any measure that directly allocates the resource; also includes regulatory measures to implement an FMP amendment).

Routine Management Measures

- Routine management measures are those that the Council determines are likely to be adjusted on an annual or more frequent basis. The Council will classify measures as routine through either the specifications and management measures or full rulemaking processes. In order for a measure to be classified as routine, the Council will determine that the measure is appropriate to address the issue at hand and may require further adjustment to achieve its purpose with accuracy.
- Once a management measure has been classified as routine through one of the two rulemaking procedures outlined above, it may be modified thereafter through the single meeting notice procedure only if (1) the modification is proposed for the same purpose as the original measure, and (2) the impacts of the modification are within the scope of the impacts analyzed when the measure was originally classified as routine.

Highly Migratory Species

Biennial Process for Specifying Management Reference Points and Management Measures

- Management measures may be imposed for resource conservation, or social or economic reasons consistent with FMP procedures, goals and objectives.
- Under most framework procedures, management measures may be established, adjusted or removed using the following categories of actions:
 - Automatic actions – may be made effective immediately in a single Federal Register notice (these include actions that are nondiscretionary and which have already been analyzed in advance).
 - Notice actions – require **at least one Council meeting** and one Federal Register notice (these are management actions other than automatic actions that are either nondiscretionary or within the scope of a previous analysis).
 - Abbreviated rulemaking actions – normally require **at least two Council meetings** and one Federal Register notice (this process is used only when time is insufficient to use the full rulemaking process).
 - Full rulemaking require actions – **at least two Council meetings** and two Federal Register notices consisting of proposed and final rules (these include any proposed management measures not falling within the other categories, including measures that are highly controversial or that directly allocate a resource, such as regulatory amendments or adjustments to change management rules).

Salmon

Inseason Management Actions and Procedures

- Inseason modifications of the regulations may be necessary under certain conditions to fulfill the Council's objectives. Inseason actions include “fixed” actions (e.g., automatic season closures when a quota has been reached) or “flexible” actions (e.g., modification of quotas and/or fishing seasons).
- Inseason actions are taken by the Secretary of Commerce through the NMFS Regional Administrator and **do not require a Council meeting** or Federal Register notice (notice of inseason actions will still be filed with the Office of the Federal Register as soon as is practicable).

FMP Amendment

- Depending on the required environmental analyses, the amendment process **generally requires at least a year** from the date of the initial development of the draft amendment by the Council. In order for regulations implementing an amendment to be in place at the beginning of the general fishing season for salmon (May 16), the Council will need to begin the process by no later than April of the previous season.