

Steps in the Adaptive Management of Allocations

The National Marine Fisheries Service (NMFS) and the Council Coordination Committee (CCC) have been discussing what type and/or level of guidance is needed for allocation decision-making as well as what factors should be considered. In May 2014, the CCC voted to split the tasks of writing the guidance into two sections. The CCC tasked a subcommittee (the CCC allocation working group) with drafting guidance on *when* to make allocation decisions and NMFS was asked to draft guidance on *what factors* should be considered when making allocation decisions. Both groups agreed answers to these questions should be based on the idea of adaptive management and thus should be tied to fishery management plan (FMP) and allocation objectives. A decision tree outlining the allocation review process is provided below (Figure 1), with a brief explanation of the steps outlined here. Councils will need to determine what triggers and thresholds are applicable for each of their fishery management plans that contain an allocation decision, including allocations across jurisdictions (e.g., international, state, regional), across sectors (e.g., commercial, recreational, tribal, research), and within sectors (e.g., individual fishermen, gear types).

Step One: A trigger is met. There are three main categories of triggers: public input, time, or indicator based. Triggers are discussed in more detail in the CCC working group guidance document. If the trigger is indicator-based, or time-based, then proceed immediately to step 2: allocation review. If the trigger is based on public input through either a petition, solicited feedback, or through the normal Council process, then a check for changes in social, ecological, or economic criteria is required (step 1a in Figure 1) to ensure assessment of the allocation is an appropriate use of Council resources. At this stage, in depth analyses are not required.

Step Two: Before proceeding with the official amendment process, Councils should complete a review of the allocation decision in question. If the FMP objectives are not up-to-date, the Council should discuss and update the objectives. Both the CCC document and NMFS document discuss the importance of updated objectives. Once the objectives are up-to-date, a review should be conducted to determine if the FMP objectives are being met. In addition to the FMP objectives, the review should consider if other relevant factors have changed that may be important to an allocation decision. Relevant factors are described in the NMFS guidance document. At this stage, in depth analyses are not required; however, to ensure transparency, a clear articulation of the objectives and how they are or are not being met, and a clear rationale on relevant factors considered should be included in the record. This allocation review informs a *go/no go* decision to move to consideration of new allocation alternatives, where *go* means the objectives are not being met and *no go* means objectives are being met and no other relevant factors have changed.

Step Three: Proceed with formal analyses and follow the Council amendment process for identifying alternatives, soliciting public input, etc. During the identification of alternatives, Councils should consider the factors provided in NMFS' guidance. All of the factors do not need to be analyzed for each allocation decision. If a factor is not relevant for a given decision, no formal analysis for that factor is needed; however, the record should clearly document the rationale for that determination.

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