

MARINE MAMMAL COMMISSION
4340 EAST-WEST HIGHWAY, ROOM 905
BETHESDA, MD 20814

21 July 2003

William T. Hogarth, Ph.D.
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East West Hwy., Rm. 14564
Silver Spring, MD 20910

Dear Dr. Hogarth:

The Marine Mammal Commission and its Committee of Scientific Advisors appreciates the opportunity to comment on *Priorities for the 21st Century: NOAA Fisheries Strategic Plan for FY 2003 - 2008*. The National Marine Fisheries Service is the most critical agency in the government for research, protection, and management of marine mammals and the ecosystems on which they depend. The Commission relies on the leadership of individuals throughout the Service for all aspects of marine conservation, science, and management. For that reason, the Commission believes that a well-developed plan that includes a strategic vision for the agency and the resources for which it is the primary stewards is essential.

The Commission commends the Service for acknowledging that many aspects of marine ecology, particularly the interrelationships of species and their habitats, are not well understood by scientists or managers. The Commission supports your efforts to highlight this and hopes that the strategic plan assists the Service in obtaining the funding it needs for research designed to answer the critical questions. Increasing our understanding of these complexities will facilitate better management. However, the lack of information or understanding should not be a blind behind which the agency stands when it must make difficult management decisions. As the strategic plan points out, every day Service officials make decisions on critical fishery, marine mammal, and endangered species issues without comprehensive knowledge of the impacts of those decisions. Better information should improve, but does not insure, better decisions.

The Commission's primary concerns with the strategic plan are that it does not recognize the current crisis in living marine resource management, articulate a clear vision for responding to it, or elucidate the leadership role which we need and expect the Service take to address that crisis. The content of the strategic plan seems to be more of a rationale and justification for the Service to build new programs and increase budgets rather than a strategic vision for improving the condition of living marine resources. It is difficult to do the former before doing the latter. Although the Commission has repeatedly recommended that the Service take additional steps to improve fisheries and marine mammal management, others are now joining the chorus. In recent years, several highly acclaimed independent scientific and management organizations, such as the National Research

PHONE: (301) 504-0087
FAX: (301) 504-0099

Council, the National Academy of Public Administration, the Pew Oceans Commission, and the U.S. Commission on Ocean Policy, have concluded basically the same thing – that a crisis does exist:

- "Our oceans are in trouble. Our coasts are in trouble. Our marine resources are in trouble...all, perhaps in serious trouble.... The depletion of our fish stocks continues. Marine fisheries management has an uneven, and often poor record. Scientific advice has been ignored all too often at the expense of fisheries and the long-term sustainability of the fishing industry. Reform is needed...but what kind?" Mid-Term Report of the U.S. Commission on Ocean Policy, 2002.
- "The federal fisheries management system is in crisis, and signs of the system's distress are compelling..." National Academy of Public Administration, 2002.
- "[These] threatened fisheries are important economically, culturally, and for supplying protein to a growing human population. The ecosystems to which the targeted fish, invertebrates, and plants belong provide additional goods and services to society, so they too must be considered in a holistic view of the problem. ...The committee concludes that a significant overall reduction in fishing mortality is the most comprehensive and immediate ecosystem-based approach to rebuilding and sustaining fisheries and marine ecosystems. The committee's specific recommendations, if implemented, would contribute to an overall reduction in fishing mortality in addition to providing other protective measures." National Research Council, *Sustaining Marine Fisheries*, 1999.
- "Humanity's hunger for ocean resources and our vast capacity to exploit them result in unprecedented impact upon the oceans and coasts. The disturbing signs of these impacts can be found nearly everywhere we look. Yet, our laws, government institutions, and governance practices have not kept pace with these changes." Pew Oceans Commission, 2003.

These reports have merit. The Service cannot ignore them or the many problems that exist in marine management and science systems. *Priorities for the 21st Century: NOAA Fisheries Strategic Plan for FY 2003 - 2008* fails to describe these problems and address them in a clear, open, and progressive manner. Instead, the draft strategic plan largely perpetuates the current system. The Commission recommends that the Service fundamentally rethink its strategic plan to address this crisis and develop a plan that contains a strategic vision for enhancing existing conditions of living marine resources. The Service should establish meaningful and achievable goals for restoring and managing the Nation's living marine resources and maintaining the human economies that rely on them.

In the Commission's opinion, the "Manage" strategy of the plan is particularly weak. The strategy has four components: regulatory streamlining; bycatch reduction; capacity reduction; and aquaculture. The Commission questions what this strategy will do to improve the conditions of living marine resources. For instance, streamlining the regulatory process by delegating more decisions to the fishery management councils and regional offices with which they are closely associated is likely to exacerbate rather than resolve existing management problems. Reducing

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bycatch of non-target species, including finfish, marine mammals, and endangered species, in eight fisheries by 2008 (the stated goal) is important to do but, in itself, will not provide the level of protection and management that is needed to restore populations. Promoting aquaculture as an alternative to sound management of natural resources raises more ecological problems than it solves. None of the components address ecosystem-level topics, including the indirect effects of fishing, or ecosystem management that the plan espouses as the primary objective of future management. The plan should explain what the Service needs to do in both science and management arenas to evolve toward ecosystem management.

The Commission intends these comments to be constructive. The Commission holds you and your staff in high regard. The relationship we maintain with the Service is very important to us and to the resources and people about which we are all concerned. We would welcome an opportunity to meet with you and to work with your staff to discuss what we think would be an appropriate vision for living marine resources and how the Service can improve the condition of the resources through a strategic plan that will lead federal efforts to restore and maintain the Nation's living marine resources.

Sincerely,

A handwritten signature in black ink that reads "John Reynolds". The signature is written in a cursive, flowing style.

John E. Reynolds, III, Ph.D.
Chairman

cc: ADM Conrad Lautenbacher
Ms. Joyce Wood