



# MARINE MAMMAL COMMISSION

7 March 2011

James W. Balsiger, Ph.D.  
Regional Administrator  
National Marine Fisheries Service  
709 West 9th Street, Room 420A  
P.O. Box 21668  
Juneau, Alaska 99802-1868

Dear Dr. Balsiger:

On 21 January 2011 the Marine Mammal Commission wrote to you to express our concern regarding the scientific independence of the Cook Inlet Beluga Whale Recovery Team. Our concern was based on the state of Alaska's requirement that state scientists serving on the team participate and contribute only insofar as they remain true to state policy. That constraint is inconsistent with the team's terms of reference and with accepted scientific practice. It also is inconsistent with the President's directive on scientific integrity.

On matters of science, team members must be able to contribute independently and to the best of their scientific abilities. All scientific aspects of the beluga recovery plan will depend on a full and open exchange among the scientists on the team. The scientists must be able to discuss, debate, and adapt their views to produce the best possible assessment of the scientific issues and the scientific work that is needed to address them. The state's insistence that their scientists present only state policy will constrain the essential scientific discourse. In turn, that constraint will cast doubt on the team's recommendations, undermine and lessen confidence in the recovery plan, and—most importantly—put the Cook Inlet beluga whale population at added and unnecessary risk.

In a letter to you about this matter, the Alaska Department of Fish and Game indicated that the Service was aware of the constraints imposed by the state when it invited state scientists to join the team. That is not the central issue here. Instead, the central issue is whether policy should be allowed to constrain the scientific discourse that is central to the team's deliberations. Allowing a state, or federal agency, or any other governmental body to impose its policy on a recovery team would set a misguided, unfortunate precedent. The very essence of the scientific process is that it seeks to discover and understand the world as it is, not as we would like, choose, or dictate it to be. All of the available evidence clearly indicates that recovering the Cook Inlet beluga whale population will be a great challenge. Constraining the science needed to guide that process can only exacerbate the situation.

The two state scientists on the team could be important contributors, but only if they are allowed to participate in an unfettered manner and to the best of their abilities. Therefore, if the state of Alaska does not relinquish its constraints, then the Marine Mammal Commission urges you to dismiss the state's scientists from the team. Please contact me if you wish to discuss this request.

James W. Balsiger, Ph.D.  
7 March 2011  
Page 2

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a large, sweeping initial 'T'.

Timothy J. Ragen, Ph.D.  
Executive Director

Cc: Ms. Kaja Brix  
Ms. Cora Campbell  
Douglas P. DeMaster, Ph.D.  
Mr. James H. Lecky  
Tamara McGuire, Ph.D.  
Lois C. Schiffer, Esq.  
Mr. Eric Schwaab