

**Responses to post-hearing questions from Senate Commerce Committee
(following the September 14, 2004 hearing in Washington DC)**

Ms. Stephanie Madsen, Chair, North Pacific Fishery Management Council

From Senator Snowe

1. *How much flexibility do managers need to meet the often-conflicting objectives of fisheries management? How does the current 10-year timeline limit their flexibility?*

While we support rebuilding targets, managers need greater flexibility than is currently contained in the guidelines in order to respond appropriately to the conditions of specific fisheries. The Councils have gone on record recommending that the SFA be amended to provide sufficient flexibility to allow short-term adjustments to rebuilding/target programs to account for scientific uncertainty, natural variation, current stock status, current stock trends, and multi-species fishery relationships.

A 10-year timeline may be appropriate for some species, but the life-history characteristics of many species do not fit such an arbitrary timeline. Some species are characterized as ‘overfished’ when fisheries have not occurred on the stock for decades, and the causes of their low abundance are unrelated to fishing activities. In the North Pacific, for example, while there are no overfished groundfish stocks, there are two crab stocks currently characterized as ‘overfished’, and the aggressive rebuilding plans in place prohibit or severely limit any fishing. Given those conditions, a 10-year timeline is not only arbitrary, but irrelevant to the actual time required for the stock to recover. Life history characteristics dictate that some long-lived, slow-growing species will take substantially longer to rebuild than others. This can vary considerably depending on the natural variation, fishery-independent forces, stock trends, and other factors. There is also the matter of balancing economic impacts with rebuilding timelines - for example, if a stock would be predicted to rebuild to a given level in 9 years with no fishing at all, but would be predicted to rebuild in 11 years while allowing limited fishing (and supporting numerous vessels and hundreds of fishing jobs), the 10-year timeline would be counterproductive to prudent fisheries management and to other requirements of the Act.

2. *Despite the implementation problems with the current EFH rule, it is clear that some habitats must be protected. From a management perspective, what is the best way to focus these efforts? Would the language in S2066 help you do your habitat work better?*

While broad identification of EFH, along with potential mitigation measures, can be an appropriate management tool, specification and protection of truly ‘essential’ fish habitat is most appropriately focused through a finer scale of resolution. The language in S2066 which defines habitat areas of particular concern (HAPC) as discrete subunits of EFH would allow us to better focus on truly essential fish habitat areas.

In the North Pacific our Council is in the process of finalizing our EFH designations and protection measures, with final action scheduled for February of 2005. A critical part of this action is the inclusion of a parallel process for HAPC designation, the first iteration of which is also scheduled for final action in February 2005. This HAPC process involved a call for specific HAPC proposals in early 2004, for which we received nearly 30 proposals from various groups including the fishing industry, environmental organizations, and government agencies. Through analysis and public input these proposals were filtered to about 15 specific HAPC proposals, covering dozens of sensitive areas in the Gulf of Alaska and Bering Sea. Protection measures range from prohibitions on bottom trawling to full closures prohibiting any fishing activity. Generally, the proposed HAPC sites are focused on areas which contain rich benthic features (coral and other substrate), and relatively low historical fishing activity. Additional analyses are being finalized prior to Council action in February 2005. The focus on HAPC is consistent with the proposed language of S2066. It is critical to note that, in the North Pacific, existing closure areas (enacted independent of EFH or HAPC

requirements) total about 150,000 square nautical miles, or over 40% of the fishable continental shelf off Alaska. These areas are closed to bottom trawling, and in many cases to most other gear types, and were implemented for bycatch reduction, habitat protection, sea lion foraging protection, and other ecosystem-related reasons. Additional closures of specific HAPC sites would be in addition to these existing broad closure areas.

3. *From a manager's viewpoint, what is the best way to expand the role of cooperative research, and does the language in S2066 help accomplish this? My bill language would authorize \$24 million in FY04, up to \$45 million in FY08 - will this funding be enough to meet cooperative research needs around the nation?*

Having the primary research agencies embrace the usefulness of industry generated information, along with Congressional funding, is the best combination to expand the role of cooperative research. Recent efforts in the North Pacific are partnering NMFS, the Alaska Department of Fish & Game, and the crab fishing industry in a broad collaboration of cooperative research relative to the Bering Sea crab fisheries. Critical to this effort is the participation of the crab industry, partly through voluntary contributions from the industry. Coupled with federal funding, on a competitive basis, this can prove to be a powerful research tool for the Council and the NMFS. Funding as proposed in S2066 would likely be adequate to accomplish this intent.

4. *From the Councils' perspective, should anything be added or changed in my bill for enhancing enforcement efforts?*

The Councils support the implementation/strengthening of cooperative state/federal enforcement programs patterned after the NMFS/South Carolina agreement. The inclusion of direct, continued funding to expand this model is further supported by the Councils. While it may not be the appropriate subject of S2066, the Councils also want to express support for adequate funding of the mission of the U.S. Coast Guard. With the expanded duties of the USCG, particularly under the Homeland Security Department, we are concerned that adequate support of the fisheries related mission of the USCG be supported.

5. *Part of NS 8 requires managers to "minimize adverse economic impacts on communities". How exactly can this be done? If more economic data were provided by fishermen, how would the Councils use it? How would the data be utilized in a meaningful way, without unduly affecting their privacy?*

Minimizing economic impacts on communities can be accomplished in a number of ways, depending on the management action being taken and the fishery in question. Fishing and processing activities, as well as numerous support functions, are tied directly to communities, and impacts can be managed by determining how and where fishing and processing activities occur, or how such activities are allocated among different sectors of fishermen. Other mechanisms, often associated with development of IFQ type programs, can be utilized such as direct allocations to community entities or regionalization of catch or processing quotas. The North Pacific Council has utilized these and other mechanisms to minimize impacts to fishing communities throughout the development of its fishery management plans. Many of the provisions of the halibut and sablefish IFQ program, such as vessel category restrictions and owner on board provisions, were designed specifically to protect the fabric of coastal communities involved in these fisheries. Recent amendments further allow the direct purchase of quota share by community entities. The North Pacific Council's recently approved crab rationalization plan also contains regional delivery requirements to ensure the continued participation of certain communities in these fisheries. Because processing facilities are often central to coastal community economies (and in Alaska are remotely located in isolated communities), processor quotas, or other processor provisions, have been implemented to offer additional protection for such communities' continued participation in the fisheries.

Additional economic data, from fishermen, processors, and communities, would allow the Councils to conduct more meaningful social and economic analyses of potential impacts of fishery regulations. In addition to NS 8, the Magnuson-Stevens Act (MSA), the National Environmental Policy Act (NEPA), the Regulatory Flexibility Act (RFA), and Executive Order 12866 require assessment of distributional social and economic impacts to all participants, and also require overall cost/benefit assessment of proposed actions. The ability to conduct comprehensive and complete analyses in this regard requires not only revenue, but cost information as well. And such economic information is necessary from processing operations as well as fishing operations to develop a complete analysis. Availability of this information would allow the Councils to more fully comply with the provisions of applicable laws, and to more fully understand the implications of proposed management actions. Current law is contradictory in that it requires economic analyses while simultaneously prohibiting the collection of certain necessary information. In fact, recent programs in the North Pacific, including the crab rationalization program, contain requirements for submission of economic performance information, in order to facilitate future assessment of program success.

Aggregation of certain types of information across several fishing or processing operations can (and currently does under existing state and federal regulations in the North Pacific) ensure that individual financial information is not disclosed. As under current law, individual Council members would have access only to aggregated information. In order to clarify and enhance the confidentiality of certain proprietary financial information, Section 402(b)(1) and (2) could be amended to state that any information collected “that would disclose proprietary or confidential commercial or financial information regarding fishing or processing operations” shall be confidential and shall not be disclosed, and similarly specify that such information can only be made public in aggregate or summary form.

From Senator Cantwell

1. *The North Pacific example - citing the North Pacific as a model.....and attributing our success to a reliance on science and management philosophy grounded in an ecosystem- approach....Do you believe that the MSA needs to be amended to ensure that other regional fishery councils adopt a similar approach? Or do you believe that other councils will be able to get there on their own?*

While additional provisions could be adopted as ‘forcing mechanisms’, I believe that the current MSA contains all of the necessary tools for any council to adopt a similar approach, and to ‘get there on their own’. Limitations on available science (stock assessment or otherwise) and/or limitations on available funding that exist in some regions may be a factor impeding progress, but that appears to be independent of MSA provisions.

The approach used in the North Pacific is first and foremost grounded in the availability of sound stock assessment and other science, and a strict adherence to following that science, allowing managers to set strict and conservative catch limits for all managed species. The recommendations of the Council’s Scientific and Statistical Committee (SSC) regarding upper catch limits for all species are followed strictly. Availability of such information is of course key to that approach. Secondly, a comprehensive on-board observer program (mostly industry funded), coupled with real-time reporting and catch accounting mechanisms, allow close tracking of all catch and bycatch, and fisheries are closed when quotas are reached. All catch, whether targeted or not, whether retained or not, counts towards the quota. Additional measures which contribute to the overall ecosystem approach include: extensive closure areas to protect habitat, limitations of fishing capacity in all fisheries, and a strong research program aimed at further understanding ecosystem interactions. In situations where councils are not believed to be following the proper scientific advice, or where the necessary provisions are not developed in the fishery management plans, the Secretary of Commerce (NMFS) has the final authority to disapprove management decisions or initiate Secretarial management plans.

2. *Council membership and appointments - the US Commission on Ocean Policy recommends altering the appointment process to broaden the range of interests represented on the Councils. In your testimony you opposed any change to the current process. Do you disagree with the Commission's findings that the membership needs to be broadened? If not, do you have suggestions for expanding the range of interests represented without changing the appointment process?*

I believe that the current process allows for a broad range of interests to be nominated and/or appointed to the Councils, and that is reflected in a broad representation that currently exists. To assert, or imply, that commercial and recreational fishermen, processor interests, community representatives, academics, and state and federal fisheries managers are incapable of representing a conservation perspective is fundamentally erroneous. As has recently been oft-stated, the perception of the 'fox guarding the henhouse' should be more appropriately characterized as the 'farmer guarding the henhouse'.

3. *Separating Conservation and Allocation - In your testimony you highlight the fact that the line between conservation and allocation is not clear in many decision faced by the Council. You also state that setting annual catch limits sometimes requires members to make judgements on uncertain or conflicting science. Yet according to a report by the National Research Council - Improving the use of best scientific information available - nearly all of the current 118 members of the regional councils have no background in stock assessment science. If it is true that council members have no expertise in stock assessment, what makes them qualified to make judgements about uncertain or conflicting science? Shouldn't decisions about safe levels of harvest be grounded in scientific expertise? Do you support the USCOP recommendation on training of council members?*

While most Council members do not have formal backgrounds in stock assessment science, I do not believe it is accurate to state that they have no expertise in stock assessment. In cases of conflicting or uncertain science, it is the Council members' other areas of expertise that can become relevant, including the balancing of other objectives with such uncertain or conflicting science. Decisions on safe harvest levels should absolutely be grounded in scientific expertise. The Councils all support the concept of training for council members, but not necessarily as a provision for voting.

Many Council members, while not specifically trained in stock assessment science, do have advanced educations, they possess extensive 'layman's' knowledge relative to the fisheries they manage, and they are exposed to and receive 'on the job' training as Council members or through their previous participation on Council Advisory Panels. However, a larger point needs to be made that Council members need not be formal experts in stock assessment to perform their responsibilities effectively. In cases where scientific stock assessment information is not in dispute (as is the case in the North Pacific in almost every circumstance, where members are provided detailed stock assessment information in an understandable format), decisions on harvest levels should be, and are, based on that information. In cases where conflicting or uncertain scientific information is on the table, it is unclear how formal expertise would be expected to resolve such conflict or uncertainty (if the dedicated scientists cannot figure it out, how would an average council member, even if he/she were formally trained?). This is where the Council process, by design and with input from the public, is most appropriate in balancing such information, taking into account other objectives mandated by the MSA. A final approval authority for such decisions rests with the NMFS, who are the providers and caretakers of most of the available stock assessment information. A further point that can be made is that some training might be considered for the stock assessment scientists themselves, in order to more effectively convey complex information to not only Council members, but to the public at large which plays a critical input role in the overall Council process. Regarding training for Council members, this is definitely a positive recommendation from the USCOP and is supported by the Councils. However, such training as a provision for voting is not supported, as it is not within the power of each Council, or each Council member, to guarantee such training will be provided in a regular and timely fashion, nor do we consider that to be a necessary requisite for responsible decision-making where good science is provided.

4. *NEPA and the Council process* - At the hearing both you and Dr. Hogarth addressed a need to reconcile the requirements of NEPA with the planning requirements of the MSA. Please outline in more detail how the timelines and administrative processes of these two statutes conflict. Specific examples of redundancy would be helpful in understanding the inefficiency.

To reinforce some of my previous testimony, the ability of the Councils and NMFS to develop and promulgate effective fisheries management programs is seriously impeded by the 'process' requirements, and associated litigation, under NEPA, as well as the Administrative Procedures Act (APA). We believe that the provisions of the MSA effectively address the provisions of these other Acts, that legislation should be enacted reaffirming MSA as the primary Act for purposes of fisheries management, and that this can be done without compromise to the underlying conservation intent of NEPA, or the process intent of APA.

Since the mid to late 1990's, with the first successful litigation challenges to fisheries actions under NEPA, fisheries management has become a NEPA-driven process, rather than a process driven by MSA. Requirements under NEPA have been overly-construed, by some courts and by agency attorneys, to require consideration of unrealistic management alternatives, unnecessarily over-complicated and user-unfriendly analyses, and grossly extended timelines for review prior to and following Council management recommendations. Recent agency initiatives, under the label of 'Regulatory Streamlining', will likely exacerbate this situation with every Council management action subject to pre-approval (within the agency and prior to Council action) relative to NEPA requirements. Council and NMFS resources are being diverted from their management focus in attempt to gird our process against litigation, and it is threatening to cripple our process. Because the process requirements of NEPA do not fit the mold of fisheries management under MSA, it creates fertile opportunity for often frivolous litigation, which often circumvents the very public process envisioned by this Act and the MSA. The plethora of lawsuits is not so much because we are doing the wrong thing, it is more often simply because the (over) application of NEPA provides an easy opportunity for litigants to challenge actions they do not agree with. While judicial remedy should always be available to address real shortcomings in our management process, current litigation often has the perverse effect of thwarting necessary conservation actions.

Some examples from the North Pacific may help illustrate this Catch-22. The Council's original EFH amendments were challenged under NEPA claims of deficiency in the EIS, resulting in settlement negotiations and at least a three year delay in implementation of amendments which would have defined and provided protection for EFH and HAPC in the North Pacific. Similarly, the Council began development of a programmatic groundfish EIS for our fishery management plans in about 1998. Through court orders and settlement negotiations, where plaintiffs attempted to directly influence the outcome of the EIS process, completion of that EIS was delayed for an additional two years, resulting in a 7,000 page 'NEPA' document. The Council and NMFS devoted thousand of hours of valuable, limited staff resources to these litigation-driven exercises, compromising our ability to focus time and resources to address real management and conservation issues. In a more recent example, the court's interpretation of NEPA and APA requirements for additional public review and comment (in addition to the review and public input provided through the Council process under MSA) have compelled the Council to set annual catch limits for North Pacific fisheries for a two year period, instead of one year at a time. The net result is that we are precluded from using the best scientific information available, on an annual basis, due to the process requirements of an Act that clearly conflicts with the conservation intent of MSA. In more general terms, the current fixation on process rather than substance is delaying the development and implementation of numerous Council programs, by agency requirements to illustrate full compliance with NEPA prior to action by the Council, including management programs aimed at reducing bycatch and discards in North Pacific fisheries, and programs designed to further rationalize fisheries for economic and safety benefits.

Some recent developments further serve to illustrate the 'over-application' of NEPA with regard to fisheries management related actions. Implementation of emergency rules, a provision of the MSA to allow Councils

to address immediate conservation issues, require a full NEPA analytical package (environmental assessment/regulatory impact review/initial regulatory flexibility analysis) and NEPA rulemaking/comment process before implementation is possible. The implications of this with regard to ‘fisheries emergencies’ is self-evident. More recently, NOAA legal guidance has advised that NEPA analytical packages and associated rulemaking may be required for the basic act of granting funds (to research and other fisheries related grant recipients). Application of NEPA to this administrative aspect of fisheries management illustrates the degree to which this Act is being unnecessarily ‘over-applied’.

The requirements for environmental, social, and economic analysis, scientific review, and public input specified under the MSA are substantially the same as under NEPA. MSA and other laws contain provisions which effectively address 90% of the letter of NEPA and probably close to 100% of the underlying intent of NEPA. These include:

- the 10 national standards listed in the MSA
- section 302 which specifies procedural requirements, and public input
- section 303 which specifies required and discretionary provisions of FMPs, and associated analytical requirements
- section 304 which specifies the review, comment, and approval process for management actions
- specific provisions of the 1996 amendments (Sustainable Fisheries Act)
- numerous other law including the Endangered Species Act, the Regulatory Flexibility Act (which requires analysis of impacts on small entities), and Executive Order 12866 (which requires extensive social and economic impact assessment)

From Senator Lautenberg

1. *How prevalent and pervasive is conflict of interest within the RFMCs? Do you believe that RFMC members should be beholden to the same conflict of interest provisions that apply to other Federal employees? Are you aware of any other Federal regulatory body that operates under the same conflict of interest rules as the RFMCs?*

I believe that the conflict of interest allegation is an inaccurate perception, more than a reality. Conflict of interest is neither prevalent nor pervasive. Council members are not federal employees, yet there are explicit conflict of interest and recusal regulations issued for both Council members and Federal employees, which are quite similar. I am not conversant with the conflict of interest rules for other federal regulatory bodies.

Indeed, the Council process by design includes representatives from commercial and recreational fisheries sectors, specifically for the expertise and knowledge they bring to the table, and because they are among the most affected stakeholders in management of these public resources. To repeat a phrase from an earlier question, the perception of the ‘fox guarding the henhouse’ should be more appropriately characterized as the ‘farmer guarding the henhouse’. In the North Pacific, the Council never exceeds the recommendations of its SSC relative to basic environmental and conservation issues such as total allowable catch. Regarding allocation decisions of available fishery resources, there are recusal regulations in place which preclude a council member from voting on an issue where there is a direct, substantial financial link. Conflict of interest rules for Council members are similar to those for federal employees, but not exactly the same due to the very nature of federal employees’ role in the process. Additionally, there are post-Council-membership restrictions which prevent ex-Council members from testifying on matters in which they have a direct interest. Council members with financial interests in the fishing industry are required to disclose those interests (or their family’s interests) as a condition of their membership. Whether these rules are stricter than those for other federal regulatory bodies I cannot say, but they do appear adequate to prevent any abuses which commonly fall under the banner of ‘conflict of interest’.

2. *Do you support broadening the RFMCs to include representatives of conservation groups and/or non-fishing interests, and if so, in what proportion to the Council as a whole? If not, please explain why.*

To reiterate the answer to an earlier question, I believe that the current process allows for a broad range of interests to be nominated and/or appointed to the Councils, and that is reflected in a broad representation that currently exists. There is ample opportunity for the Governor to nominate, and the Secretary to appoint, council members from a broad array of constituencies. To assert, or imply, that commercial and recreational fishermen, processor interests, community representatives, academics, and state and federal fisheries managers are incapable of representing a conservation perspective is fundamentally erroneous. In the North Pacific, a Council with only 11 voting members, we have had long-time members from the academic community with no financial stake whatsoever in the fisheries. We currently have a member who is a member of the business community and a sport fisherman, but with no financial stake in the fisheries whatsoever. Four of our 11 voting members are the leaders of State and Federal fisheries management agencies. I believe that all of these Council members, as well as those appointed by the Secretary from various sectors of the fishing industry, consider themselves to possess a conservation perspective on managing fisheries.

3. *What improvements would you recommend to alleviate the pressure on RFMC members when they allocate fish? Would you support requiring members to adhere to conservation limits set by independent scientists?*

To answer the second question first - where there are strong, reliable stock assessment data, and a scientific review and endorsement of that data, I believe that councils should rely on that information and not exceed what is recommended by the scientists. That is the normal order of business in the North Pacific, where strong stock assessment information is reviewed and compiled by groundfish Plan Team scientists, then forwarded for a second review process by the Council's Scientific and Statistical Committee (SSC). That SSC is comprised of leading scientists from state and federal resource management agencies, and from leading Universities. I believe that we need to be careful in defining the term 'independent scientists' if that term is meant to imply someone completely outside a given Council's process, and perhaps unfamiliar with the specific fisheries in a particular region. We believe that a strong SSC, with scientists who are intimately familiar with regional issues and fisheries, is the most efficient and effective level of scientific review. Independent scientific reviews can be effectively utilized, as they have been in the North Pacific, when particular needs dictate.

In terms of allocation, and 'pressure' on council members in such decisions, I believe that is part of the process of fisheries management, and the regional knowledge and expertise of Council members are the tools they need to balance decisions in this regard. Having to make such decisions in a very open, deliberative, public forum, in front of a room full of the most affected stakeholders, is one of the great strengths of the council process.

4. *Do you support the training of RFMC members in fisheries science, including stock assessment and fisheries economics, Federal regulations (NEPA, APA) and statutes, and conflict of interest policies before beginning their tenure as members?*

Yes and no. Training for Council members, is definitely a positive recommendation from the USCOP and is supported by the Councils. There are currently annual or biennial training sessions for newly appointed council members which focus on regulations, process, and conflict of interest issues. More recently there have also been periodic training courses for NEPA process specifically. I believe that these are extremely beneficial to both new and existing council members. Council members benefit from 'on-the-job' training via the detailed presentations received in the course of their duties, from stock assessment scientists and other

experts. Additional training, in stock assessment or fisheries economics, would be beneficial as well, but should not be a condition to participation as a voting member. The time between appointment and the first council meeting is only a couple months, in most cases. It is not within the power of each Council, or each Council member, to guarantee such training will be provided in a regular and timely fashion, nor do we consider that to be a necessary requisite for responsible decision-making where good science is provided.

5. *The North Pacific Council has been cited as a model RFMC for fisheries management relative to other RFMCs. In your opinion, why has the NPFMC been so successful in its management of fisheries and why has this contrast been made to other RFMCs?*

The short answer is that the North Pacific is blessed with a productive ecosystem, we have strong stock assessment science and review, we always rely on that science by setting strict catch quotas for all managed species, we have a comprehensive and effective catch accounting program, we have large, long-standing areas closed to fishing activities, and we aggressively pursue and implement capacity limitation programs in all fisheries. Contrasts have been drawn to other RFMCs likely because, under the North Pacific model, we have no overfished groundfish stocks and several of them are at all-time historically high abundance levels, whereas other regions have depleted, and in some cases overfished, stocks. Other regions face additional complications of having to manage fisheries which cut across multiple state jurisdictions, while the North Pacific manages fisheries off the shores of a single state. Competing objectives and/or conflicting information are minimized in this instance.

Rather than utilizing simple effort controls, the North Pacific Council sets conservative catch quotas for each species (taking into account not only individual species dynamics but other ecosystem considerations), never exceeding the SSC advice on limits, and that is further governed by an overall 'OY cap' for both the Bering Sea and Aleutian Islands and the Gulf of Alaska. For example, for each of the past several years the total Acceptable Biological Catch (ABC) level for all Bering Sea fisheries has totaled well over 3 million metric tons; yet, the Council's OY rule limits the total allowable catch (TAC) to 2 million metric tons, all species combined. Strong, reliable science, through the NMFS Alaska Fisheries Science Center forms the basis for the program, and the NMFS Alaska Region completes the program with a comprehensive program of real-time, electronic catch reporting which assures that we are accurately accounting for catch and bycatch removals. All catch counts towards catch quotas, or bycatch limits, and fisheries are closed when quotas are reached. A comprehensive on-board observer program, under which 36,000 observer days are deployed, underpins the management and monitoring program.

In addition to the basic conservative approach to catch limits and catch monitoring, the Council aggressively pursues capacity limitation programs. All managed fisheries have been under a license limitation program, which restricts vessels to certain species, area, and gear types, since 1998. The halibut and sablefish fisheries have been operating under an IFQ system since 1995, and the largest fishery in the North Pacific - Bering Sea pollock - has been operating under a fishery cooperative system since 1999. Crab fisheries were recently rationalized through an IFQ type program which will begin in 2005. Further rationalization efforts are underway for Gulf of Alaska fisheries, and for remaining fisheries in the Bering Sea and Aleutian Islands. Fisheries management in the North Pacific is a collaborative partnership among the Council, the NMFS, the State of Alaska, the U.S. Coast Guard, other resource management agencies, the fishing industry, and other affected public- all of these partners embrace a precautionary approach to managing the public resource.

6. *The Pew and US Ocean Commissions recommend changes to the RFMC governance structure as cited in questions 2 through 4 above. Do you agree or disagree with their general recommendations regarding RFMC reform and how would you amend them?*

Generally, I believe that the tools currently exist for any Council/Region to successfully manage their fisheries and other marine resources, and while I agree with the underlying commitment to rely on strong science, I am not sure that all of the changes that they recommend are necessary to achieve that reliance. Current processes for scientific review (and use of SSCs), and current review and approval at the Secretarial level, can provide the necessary adherence to science. I do not agree with the recommendations regarding changes to the current Council membership and appointment process.