

**National Oceanic and Atmospheric Administration  
National Enforcement Summit  
Washington, D.C.  
August 3, 2010**

**SUMMIT SUMMARY REPORT**

**WELCOME AND SUMMIT GOALS**

**Dr. Jane Lubchenco**, Under Secretary of Commerce for Oceans and Atmosphere and NOAA Administrator, opened the Summit by providing a background overview and outlining the intent and expectations of the Summit. She stated that effective enforcement is essential to sustainable fisheries, vibrant coastal communities, and stable economies and that a successful enforcement program will include an enhanced on-the-ground presence; solid partnerships with state and federal agencies; education and compliance assistance; and effective staff.

She then asked the Summit participants to provide recommendations on:

1) How NOAA can work with its constituents and federal and state partners to improve compliance and enhance the effectiveness of its enforcement activities; 2) A process for establishing and maintaining national and regional enforcement priorities; 3) Improved communications with regulated communities and other stakeholders; and 4) Approaches for establishing consistency and transparency that will contribute to public confidence in NOAA's enforcement program. (See Appendix A for Dr. Lubchenco's complete introductory remarks.)

**AGENDA REVIEW**

**Susan Podziba**, Public Policy Mediator, Susan Podziba & Associates and Summit Facilitator, reviewed the planned topics and meeting format for the day.

**OVERVIEW OF NOAA ENFORCEMENT**

**Cameron F. Kerry**, General Counsel, U.S. Department of Commerce, stated that the U.S. Department of Commerce is committed to sustainable fisheries in the present and future, which will require a fair and effective enforcement program. The DOC Office of General Counsel is working closely with NOAA to promote transparency and the rule of law because "a law without enforcement is just an aspiration." Together they will work for overall compliance with regulations to protect and rebuild fish stocks. (See Appendix B for Mr. Kerry's opening remarks.)

**Eric Schwaab**, Assistant Administrator for Fisheries, NOAA Fisheries Service, spoke about NOAA's Office of Law Enforcement (OLE), whose mission is: To conserve and protect our nation's marine resources through assuring compliance with the laws and regulations established to manage these resources.

OLE's 229 staff members are responsible for enforcing more than thirty statutes including the Magnuson-Stevens Fishery Conservation and Management Act, Endangered Species Act, Marine Mammal Protection Act, Lacey Act, and Marine Sanctuaries Act in the US Exclusive Economic Zone's 4,453,068 square miles. To do so, it works with 27 state, tribal,

and territorial partners under JEAs as well as numerous federal partners including the U.S. Coast Guard, U.S. Fish & Wildlife Service, and U.S. Attorneys Offices.

OLE's four main programs are: 1) Patrols and Investigations, 2) Constituent outreach and communication through Community Oriented Policing and Problem Solving (COPPS), 3) Technology & Vessel Management System (VMS) partnerships, and 4) Partnerships. (See Appendix C for Mr. Schwaab's presentation slides.)

**Lois J. Schiffer**, General Counsel, NOAA, spoke of the value of fair and effective enforcement, outlined the role of the Office of General Counsel for Enforcement and Litigation (GCEL), and the recent actions it has taken to improve consistency and transparency. She explained that GCEL evaluates OLE referrals to determine whether they warrant a warning, a civil Notice of Violation (NOVA), or potential consideration as a criminal matter for referral to an Assistant US Attorney. She stated that a strong, effective, and fair compliance program is essential to the even-handed application of environmental laws and for fair and honest competition. She stated that an effective enforcement program must combine the tools of deterrence with tools of cooperation, including compliance assistance.

GCEL has recently adopted new measures to promote consistency and transparency including high level review of each proposed NOVA, including charges and penalties; work to assure that NOAA attorneys nationwide use the same criteria for charging and setting penalties; and development of a penalty policy and practice manual for NOAA attorneys. (See Appendix D for Ms. Schiffer's complete presentation.)

## **ACHIEVING COMPLIANCE**

### *Introductory presentations*

- **Promoting a Conservation Stewardship Ethic:** Vincent O'Shea, Executive Director, Atlantic States Marine Fisheries Commission: Mr. O'Shea suggested that NOAA OLE needs to be perceived by other stakeholders as necessary to achieving their goals. A strong majority of the regulated community must understand it is in its collective self-interest for the fisheries management system to work. Strong partnerships and a stewardship ethic of responsibility for the resource are necessary to ensure that honest fishers, who are working to be in compliance with NOAA regulations, are not hurt by cheaters.
- **Deterrence Strategies:** Dr. Jay Shimshack, Tulane University: Dr. Shimshack summarized academic research on deterrence and compliance. Results suggested that monetary sanctions, including civil and administrative fines, significantly promote compliance. Research implies that deterrence can be measured, enforcement should be publicized, and non-criminal enforcement may be cost effective. Other results suggest that geographic differences among regulatory settings should be sustained in enforcement, even as the process for determining penalties is standardized. Finally, Shimshack suggested that penalties should be considered for all violators, but the frequency and severity of penalties should increase for repeat offenders. (See Appendix E for a summary of Dr. Shimshack's presentation.)

- **Strategies for Managing Regulatory Complexity:** Maggie Raymond, Director, Associated Fisheries of Maine: To illustrate the complexity of fishery regulations, Ms. Raymond described the New England Groundfish Management Plan, which includes seasonal and year-round area closures, limited fishing times, gear restrictions, possession limits, separate quota tracking for each of the 19 species, and numerous reporting requirements and VMS declaration codes. On behalf of her members, she tracks regulations, monitors and serves on advisory panels, monitors stock assessments, provides comments on draft rules, tracks in-season regulatory changes, and provides 24/7 regulatory support for fishermen at sea. She suggested that NOAA provide education to help fishers achieve compliance as well as 24/7 access to qualified agents. She also suggested that NOAA consider that patterns of non-compliance may signal confusion rather than intent and that pulse operations may contribute more to poor relations between NOAA OLE and fishers than to compliance. (See Appendix F for Ms. Raymond's presentation slides.)

### *Small Group Discussions*

The Summit participants were divided into small groups, each of which was geographically diverse and included individuals from the Commercial Fishing Industry, Recreational Fishing / Vessel Industry, Environmental NGOs, Federal government agencies including but not only NOAA's enforcement partners, State/Tribal enforcement partners, Commissions and Councils, and NOAA regional staff. The small groups discussed the following questions:

1. Based on the presentations and your experiences with enforcement, what do you understand to be the dilemmas, tensions, and /or difficulties in achieving compliance with NOAA regulations?
2. What important elements regarding efforts to achieve compliance were not mentioned during the presentations?
3. What stands out as profound constraints and limitations that will likely continue to exist even as NOAA and the regulated communities make progress in their efforts to increase compliance?
4. Based on the presentations, your experiences with enforcement, and the conversation you just had, what strategies or actions do you recommend NOAA take to increase compliance with its regulations?
5. From among the ideas generated, which would you want to be sure were passed onto NOAA leadership?

### *Recommendations for Achieving Compliance*

The key small group recommendations for achieving compliance are grouped according to the following themes: Improve the Enforceability of Regulations, which includes strategies for developing regulations and review of current regulations; Increase Assistance and Contact between OLE and the Regulated Communities for compliance assistance and to improve relationships; Increase Efficiency for Administration of Violations; Inform the

Public of NOAA Enforcement Actions and Priorities; Improve the Scientific Basis for Regulations; and Other. (See Appendix G for the complete flipchart data.)

Below are the specific recommendations identified within each theme.

### **Improve the Enforceability of Regulations:**

#### ***Strategies for Developing Regulations***

- Industry and industry scientists should be more involved in rulemaking
- Enforceability, ability to comply, and complexity should be considered by fisheries councils in developing rules
- Minimize the complexity of the regulations and look at the regulations in totality, while balancing the necessary specificity with ease of understanding
- Involve GCEL in the Council process and in development of regulations
- Consider overcapacity in developing regulations—engage all groups

#### ***Review of Current Regulations***

- Reduce complexities: OLE, USCG, and fishers should meet with councils to audit existing regulations and provide feedback on enforceability
- Avoid frequent regulation changes and increase longevity of regulations before revising to give people time to understand them
- Clarify regulations—make them reader friendly, e.g. put regulations into a Q & A format
- Sunset some regulations or otherwise reduce the number in place at any one time.

### **Increase Assistance and Contact between OLE and the Regulated Communities**

#### ***Compliance Assistance***

- “One stop shop” for questions
- Continuing education and outreach (constant)
  - Update compliance guides
  - Forums
  - Increased accessibility of information, flexibility / grace period
- Increase access / presence
  - 24-hour
  - On dock
- Compliance guide
  - Simple
  - Phone number for questions
- Enforcement and fisheries managers should be involved in local education efforts and partnerships

#### ***Improve Relationships***

- Education for fishers: job aides, informal meetings with NOAA and states
  - Classes with scientists
  - Multi-media outreach (not just online)
- Training for OLE officers with fishers about impact of boarding
- Non-uniform “out-reachers” as educators / trainers
- Informal in-person meetings between fishers and agents

- Strike a proper balance between the responsibility of the regulated community to know regulations and outreach by the agency
- Commit to improving/increasing communications between enforcement and regulated community
- Compliance should be prioritized over enforcement
- Assign outreach work to non-enforcement NOAA staff

#### **Increase Efficiency and Consistency in Administration of Violations**

- Increase timeliness of resolution of enforcement action; reduce gap from documentation of violation to prosecution
- Use a consistent approach to evaluating violations and penalties nationally. Use objective criteria, but recognize the outcomes may differ
- Educate the regulated community on criteria that determine the penalty within the schedule
- Enforcement should take complexity of regulations into account
- Criminal vs. civil
  - More warnings
  - Intent vs. confusion
- Increase available penalties for knowing/repeating violations, decrease first-time penalties for accidental violations
- Follow up when summary settlement is not paid
- Develop a Penalty policy that encourages self-reporting
- Move GCEL to DOJ to handle adjudicatory process

#### **Increase Funding and Optimization of Existing Resources for Enforcement**

- Provide more enforcement resources (including outreach and penalties) to JEAs and OLE
- Increase GCEL staff resources
- Increase staff with differentiated assignments i.e. 7 motion-marked boats (those who do education shouldn't enforce) to interact in non-confrontational situations
- Optimize use of enforcement assets
- Target OLE resources on violators

#### **Inform the Public of NOAA Enforcement Actions and Priorities**

- Get press releases out on enforcement action promptly (same or next day)
- Highlight positive compliance
- Focus on the most egregious violators
  - Prioritize harmful resource implications
  - Follow-up publication of case outcomes
- Maximize enforcement visibility
- Publish a comprehensive report of violations

#### **Improve the Scientific Basis for Regulations**

- More funding for stock assessments (especially in-water) because compliance is aided by good science
- Validity of scientific/regulatory basis
  - More money for science center
  - Eliminate perception of politics driving process

## Other

- Use new tools and technologies to track violations on water and for electronic reporting
- Professionalize commercial captain and crew base
  - National registry
  - Licensing
- Observers should be trained in regulations

## CONSISTENCY, TRANSPARENCY, AND COMMUNICATIONS

**NOAA Presentation: Mary Beth Ward**, Deputy General Counsel, NOAA: Ms. Ward spoke of the need to increase public confidence in the fairness and effectiveness of its enforcement system, which she expects will result from increased consistency and transparency and improved communications. To achieve this goal, NOAA has initiated work on three strategies: high level review of all charging and penalty decisions nationwide, development of penalty policies to create predictability regarding the likely consequences for failure to comply, and preparation of a practice manual, which will clarify how NOAA approaches cases and charging decisions. The latter will be subjected to public review before it is finalized. In addition, NOAA plans to post on its website quarterly aggregate data of enforcement actions taken.

### *Introductory presentations*

- **What does the regulated community need to know?:** Eldon Greenberg, Attorney, Garvey Schubert Barer: Mr. Greenberg stated that enhancing consistency, transparency and communications will address a pervasive sense in the regulated community that NOAA's enforcement is arbitrary, unfair and results in the imposition of excessive penalties. He offered a number of possible reforms including: develop standards and limitations for cumulating charges and ensure higher level review of charging and settlement decisions to increase consistency; make revised penalty schedules available for public comment and publish significant rulings and settlement agreements to increase transparency; and create industry liaison positions and consider conducting non-recourse compliance audits to improve communications. In addition, he asked that NOAA consider re-opening closed cases where major fines have been imposed. (See Appendix H for Mr. Greenberg's presentation slides.)
- **Guidelines and management tools used by federal agencies to promote consistency and transparency:** Eileen Sobeck, Deputy Assistant Secretary for Fish and Wildlife and Parks, U.S. Department of the Interior: Ms. Sobeck began her remarks by reminding participants of the responsibilities and challenges of law enforcement agents and attorneys, particularly given that no one appreciates being enforced against and the adversarial nature of our system of adjudication. She then described some of the strategies used by federal agencies to increase consistency in penalties, including publicly available objective criteria and sentencing guidelines, which provide a starting point for determining a penalty based on factors similar to other violations, and "filter" reviews of charging decisions and penalties by peers, experienced prosecutors, and managers to reduce reliance on the sole judgment of a single case attorney. Finally, she stated that although there will always be some discretion and discrepancies across cases, an enforcement program lacking

consistency will not be viewed respectfully by the public, regulated communities, or the defense bar.

- **Tools used to promote consistency and transparency in the State of Florida:** Lt Colonel Bruce Buckson, Deputy Director, Florida Fish & Wildlife Conservation Commission, Division of Law Enforcement: Lt Col Buckson described his agency's penalty system, which is set by the Florida state legislature. This allows stakeholder input through the legislative process when penalties are established. It includes enhanced penalties for recreational fisheries and administrative penalties for commercial fisheries. Enhanced penalties range from \$50 plus cost of the license for a non-criminal infraction to imprisonment up to 5 years and a fine of up to \$5,000 for a third degree felony. Administrative penalties range from license suspensions and fines from \$25 to \$5,000 for a first offense for net, trap, particular species violations, illegal sale or harvest. Additional violations within certain time periods result in increased penalties. The penalty range is further clarified for specific violations in Commission rules. This rulemaking process includes a multitude of opportunities for public input in an effort to gain consensus.

Lt Col Buckson stated that transparency has helped his agency accomplish its goal of achieving compliance. It has used external strategies including public meetings, webinars, and email communications and internal mechanisms such as cross-divisional workgroups, staff meetings, and priority calibration. (See Appendix I for Lt Col Buckson's presentation slides.)

### *Small Group Discussions*

The small groups reconvened to discuss the following questions:

1. Based on the presentations and your experiences with enforcement, what is likely to result from greater consistency and transparency and improved communications?
2. What strategies do you think offer the greatest potential for achieving national consistency and transparency with regard to NOAA enforcement?
3. What are the greatest challenges for achieving national consistency and transparency with regard to NOAA enforcement?
4. Based on the presentations, your experiences with enforcement, and the conversation you just had, what strategies or actions do you recommend NOAA take to improve its consistency, transparency, and communications?
5. From among the ideas generated, which would you want to be sure were brought to the attention of NOAA leadership?

## ***Recommendations for Enhanced Consistency and Transparency and Improved Communication***

The key recommendations concerning consistency, transparency, and communication are grouped according to the following themes: Develop Penalty Guidelines, Regional and National Reviews of Penalties, Streamline Adjudication of Enforcement Cases, Publicize Enforcement Actions, Increase Interaction within NOAA, Determine Deterrence Value of Penalties, Set Strategic Enforcement Priorities, Increase Education and Outreach, and Other. (See Appendix J for the complete flipchart data.)

Below are the specific recommendations identified within each theme.

### **Develop Penalty Guidelines**

- Create a penalty schedule that is fair and equitable
  - Consistency with regional specificity
  - Aligned with FMPs and level of violation
  - Look at Coast Guard and FWS as examples
  - Clarify penalty schedule with regard to charging of comparable violations and forfeitures
- Matrix, with range and list of mitigating and aggravating factors/criteria
- Suspend licenses until penalty is paid (FL example)
- Categories of offenses that are pre-approved for summary settlements
- Limit cumulating violation counts by determining prior violations
- Develop national policy and standards with core principles to improve consistency
- Provide for stakeholder input into penalty schedules to improve consistency
- Develop consistent criteria for penalties
- Make penalties by FMP consistent within regions and look at each case (re: how egregious)
- Have councils or industry advisory groups look at penalties together to develop protocols

### **Regional and National Reviews of Penalties**

- National level review
  - \$ threshold
  - Explain aggregate sentence in NOVA
- OLE management to review consistency across regions on ongoing basis -- using data to support reviews
- Adequate oversight
  - While balancing efficiency (don't hamstring OPS)
  - While balancing regional differences
- Preserve field officer discretion

### **Streamline Adjudication of Enforcement Cases**

- More rapid response re: administrative reporting violations
- NOAA to notify person of violation early instead of letting case build

### **Publicize Enforcement Actions**

- Publicize enforcement actions at time of charging and again when case is resolved (PIL concerns)
- NOAA should develop its own database of violations that would be available to the public; it should be compiled with statistics generated at regional level
- Create GCEL Website to share
  - Penalty decisions
  - Enforcement reports
  - Useful reporting, including details
- Report out on non-violation enforcement activities in standard way
- Streamline NOAA's public affairs process to publicize OLE activities in a timely way

### **Increase Interaction within NOAA**

- Improve communication among enforcement players in each region
- OLE and GCEL databases need to be consistent and communicate with each other and must be useful
- OLE and GCEL personnel need to be efficient and communicate with each other

### **Determine Deterrence Value of Penalties**

- Penalty should not exceed the level necessary to achieve deterrence
- OLE and GCEL should provide data that justifies/supports penalties
- Identify compliance rate to know if penalties are appropriate

### **Set Strategic Enforcement Priorities**

- Be strategic in setting enforcement priorities
  - Across regions and with HQ
  - Biggest bang for buck - deterrence
  - Consistency among council regions
- Categorize violations by social/economic/biological priorities within region to increase consistency
- Set priorities on a national and regional level
- Explain rationale for slower timeline for establishing national and regional priorities; provide interim guidance pending completion of initiative(s)
- Look beyond fishery laws
  - Full resource plate
  - Explain why they are treated differently

### **Increase Education and Outreach**

- Improve outreach
  - Increase interaction with fishers
  - Increase education on regulations
- Uniformed staff (works in sanctuaries)
- Officers need to think about education and outreach as part of their mission
- Create web page with a 24/7 information line for consultation on latest regulations
- To focus education efforts OLE dock presence prior to opening of season
  - Clarify modifications and reporting requirements

- 24/7 accessible—enforcement expertise
- Good faith effort demonstrated as regulation is being violated should lead to call before activity documentation. This should be part of protocol

#### **Other**

- Amend civil procedure to allow respondents discovery as a matter of right
- NOAA ombudsman to play 3<sup>rd</sup> party neutral role between industry and government
- Leadership change in NOAA
- NOAA should address its management problems in a transparent fashion
- Consistency in VMS program
- Congressional funding for NOAA mandates to reduce dependence on asset forfeiture fund
- Consider additional civil tools such as warnings, cameras, rewards for reporting

#### **PROCESS FOR SETTING ENFORCEMENT PRIORITIES**

*NOAA Presentation of Draft Plan: Alan D. Risenhoover*, Acting Director Office of Law Enforcement, NOAA: Mr. Risenhoover described NOAA's efforts to establish a process for setting national and regional enforcement priorities annually. It is expected that the process will result in priorities that support NOAA's statutory mandates; support DOC and NOAA strategic goals; utilize stakeholder input; increase compliance; emphasize partnerships; and promote effective and fair enforcement programs.

NOAA plans to establish its process and priorities with input and feedback from its staff, partners, regulated communities, and the public. Development of the process will be completed by September 2010. Identification of NOAA's enforcement priorities will involve development of criteria for selecting priorities and public input, and will be finalized in September 2011. (See Appendix K for Mr. Risenhoover's presentation slides.)

#### *Introductory presentations*

- **How U.S. Coast Guard Sets its Enforcement Priorities:** LCDR Daniel Schaeffer, Chief, Coast Guard Living Marine Resources (LMR) Enforcement: LCDR Schaeffer stated that the U.S. Coast Guard has established Living Marine Resources (LMR) enforcement as one of its overall priorities and then described how its LMR enforcement priorities are set. The underlying principles of the LMR enforcement program are to protect life, the resource, and a level playing field. Based on data provided by its regions, USGC identifies high and low precedent fisheries and then boards 20/10% of boats respectively, which is its deterrence level formula for preventing violations. USCG continuously collects and analyzes data to readjust its efforts to ensure the best use of its limited enforcement resources. In the near future, USCG will work with its constituents to re-validate its strategic plan, which sets out its overall goals.
- **How U.S. Fish and Wildlife Service Sets its Enforcement Priorities:** Deputy Chief Gary Mowad, Office of Law Enforcement, U.S. Fish and Wildlife Service: Deputy Chief Gary Mowad stated that the FWS Office of Law Enforcement enforces laws in furtherance of the agency's strategic management goals, which are set out in its strategic plan. To develop its enforcement priorities, its seven regional Special Agents

in Charge meet and identify high, medium, and low priorities in accordance with its strategic plan. It uses a management information system to confirm its enforcement resources are focused on high priorities. While agents have the autonomy to respond to particular enforcement requests, questions would arise if significant resources were focused on low priorities.

### ***Plenary Discussion to Generate Input on NOAA's Draft Plan for Establishing Enforcement Priorities***

The following questions were posed to the Summit participants:

1. Based on the presentations, what suggestions do you have for NOAA regarding its draft plan for establishing priorities?
2. What elements do you suggest be added to NOAA's draft plan?
3. What advice do you have regarding implementation of NOAA's process for establishing national and regional enforcement priorities?

The following key points were made:

#### **Ways to obtain input on the process and eventually the priorities:**

- NOAA wants to engage its constituents and is considering how to do so using existing meetings, possibly inviting additional parties to some, may be the best way to consult with others
- NOAA will determine how to assess the varied input it will likely receive on its draft priorities
- Many of the states have strong partnerships with constituents, and NOAA can build on those existing processes that have been effective
- Sanctuary Councils can contribute on priorities

#### **Mechanisms for Identifying Priorities**

- NOAA may identify overarching national priorities and then use those to identify region-specific priorities
- Southeast region had quarterly calls including OLE, USCG, Sanctuary Council, and state partners to discuss what had occurred during the quarter and to adjust the next quarter priorities
- FWS sets high, medium, and low priorities on an annual basis. They become a useful means for educating the public and encourage better behavior on those priority issues as people expect greater enforcement attention on them
- FWS focuses its resources on the agency's conservation issues and may not enforce technical violations. For example, the capture of a wild falcon is a priority whereas paperwork for trading of captive-bred falcons gets little attention even though it is technically a violation.

#### **Selection of Priorities**

- NOAA should consider if the current balance between fisheries and its non-fisheries programs is appropriate; it may be that additional resources should be focused on marine mammals and National Sanctuaries

- A question was raised on enforcement actions regarding illegal imports. Should these be a NOAA priority given that they are an economic priority but not a resource priority? Are there other partners that could take the lead on those cases thereby freeing up NOAA's limited resources?

### **Strategies for Implementing Priorities**

- Can technology such as cell phones and other newer technologies be useful in clarifying technical violations so more resources are available for higher priority issues?
- Both FWS and NOAA are involved in enforcing complex regulations, which requires public education to enable those who want to comply to be able to comply
- NOAA OLE may be more reactive in response to phone calls it gets that require investigation; FWS OLE agents also respond to such calls, but through its tracking system checks to be sure that most efforts are focused on its high priority goals Agents may provide a rationale for lower priority investigations but management will question when an agent is spending significant taxpayer money on a low priority

### **NEXT STEPS FOR SUMMIT MATERIALS**

Susan Podziba, Summit Facilitator, told participants that the Summit Summary Report will soon be available on the website (<http://noaaenforcementsummit2010.ecr.gov/>). The recorded version of the webcast will be available on the Summit website for one year, and the results of the small group sessions will be embedded within the webcast.

### **NOAA'S NEXT STEPS**

Dr. Jane Lubchenco, closed the Summit by acknowledging the creative and fresh ideas that were generated and outlining some key themes and messages resulting from the breakout discussions. She reconfirmed NOAA's commitment to continue with current initiatives to address OIG recommendations and is looking forward to receiving the detailed recommendations from the Summit. She closed by noting that NOAA is looking forward to working with its stakeholder communities and partners to implement them. (See Appendix L for Dr. Lubchenco's concluding remarks.)

### **Appendices:**

Appendix A	Dr. Jane Lubchenco's introductory remarks
Appendix B	Cameron Kerry's opening remarks
Appendix C	Eric Schwaab's presentation slides
Appendix D	Lois Schiffer's presentation
Appendix E	Summary of Dr. Jay Shimshack's presentation
Appendix F	Maggie Raymond's presentation slides
Appendix G	Achieving Compliance Small Group Data
Appendix H	Eldon Greenberg's presentation slides
Appendix I	Lt Col Bruce Buckson's presentation slides
Appendix J	Consistency, Transparency, and Communication Small Group Data
Appendix K	Alan Risenhoover's presentation slides
Appendix L	Dr. Jane Lubchenco's concluding remarks