

PACIFIC FISHERY MANAGEMENT COUNCIL

7700 NE Ambassador Place, Suite 200
Portland, Oregon 97220-1384

Telephone: 503-820-2280
Toll Free: 866-806-7204
Fax: 503-820-2299
www.pcouncil.org

June 1, 2004

Exhibit B.4.a
Attachment 1
June 2004

EXECUTIVE DIRECTOR
Donald O. McIsaac

CHAIRMAN
Donald K. Hansen

Admiral James D. Watkins, USN (Ret.)
U.S. Commission on Ocean Policy
1120 20th Street, NW
Suite 200 North
Washington, D.C. 20036

Subject: Public Comment on Preliminary Report

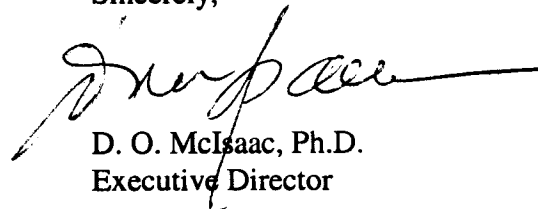
Dear Admiral Watkins:

The Pacific Fishery Management Council thanks you for the opportunity to comment on the Commission's preliminary findings and recommendations for a new, coordinated, and comprehensive national ocean policy. The Pacific Council believe this is an important effort that focuses national attention on the value of our marine resources, the complexity of the associated management issues, and the need to properly support and fund more comprehensive and coordinated initiatives. However, we do not believe the Commission's Preliminary Report has reached an optimal state of refinement yet.

We offer comments in two areas that we believe will improve the current draft. Attached are general comments on ocean governance and the important role of regional fishery management councils. The attachment also specifically responds to recommendations in Chapter 19 – "Achieving Sustainable Fisheries."

Again, the Pacific Council appreciates the opportunity to comment on the Commission's Preliminary Report. We look forward to coordinating further with you and our state partners as we all work toward managing our marine resources for both present and future generations.

Sincerely,



D. O. McIsaac, Ph.D.
Executive Director

DAW:cp
Enclosures

c: Council Members

Pacific Fishery Management Council Response to the U. S. Commission on Ocean Policy Preliminary Report

May 26, 2004

The Pacific Fishery Management Council (Pacific Council) commends the U.S. Commission on Ocean Policy (USCOP) for the comprehensive information presented in its preliminary report. The report brings needed attention to marine issues and highlights the connectedness of humans to our environment. Ocean governance is a multifaceted process that requires a carefully coordinated management system, and the USCOP report emphasizes the complexity of this process and the roles of the many agencies and organizations involved.

The Pacific Council also thanks the USCOP for the opportunity to review the preliminary report and comment on the draft recommendations. We have included below a perspective on ocean governance and the strengths of the existing regional fishery management council (RFMC) system. Specific comments about USCOP recommendations in Chapter 19 – “Achieving Sustainable Fisheries” are also included. As the USCOP finalizes its report, the Pacific Council hopes the information we provide will help to improve the final recommendations and result in a document that leads to clear Congressional guidance, dedicated funding, new scientific research, and improved ocean governance. The Pacific Council is willing to provide more detailed information if it would assist the USCOP in their final deliberations.

Ocean Governance

The Pacific Council agrees with many of the findings of the USCOP, especially the need for increased awareness of and attention to ocean governance. This heightened awareness needs to occur at the highest level of government, within coastal communities dependent upon ocean resources, and throughout the nation if the aims of the USCOP are to be achieved. Dedicated funding for this purpose is a paramount priority.

The RFMC process is unique among natural resource agencies in that those who are most affected by policies have a voice in decision making. The preliminary report recognizes the importance of participatory governance, noting that “governance of ocean uses should ensure widespread participation by all citizens on issues that affect them.” Further, the report states, “many of the nation’s most pressing ocean and coastal issues are regional in nature and require input on planning and management by state and local policy makers and other relevant stakeholders.” The fishery management council process provides a foundation for this much needed regional planning and management.

In this regard, the USCOP report would benefit from greater recognition of the strengths and accomplishments of the RFMC system. Certain regional councils are singled out as positive examples of how fishery management principles should be applied; indeed, these compliments are warranted. However, most regions are implicated as performing poorly, and the take home message is that U.S. fishery management has failed. The Pacific Council believes this an extreme and pessimistic view. This conclusion fails to recognize the professionalism and diligence of regional council staff and the federal, state, and tribal management partnerships that gird the RFMC process, as well as the positive results that have been achieved.

This is not to suggest that fishery management is optimal and that no problems exist. The Pacific Council, as in other regions, is under tremendous pressure to fulfill our congressional mandate to balance resource conservation with fishery sustainability. National Standard 1 requires regional councils to prevent overfishing while achieving, on a continuing basis, the optimum yield from each fishery. In this regard, the intent of Congress has been interpreted by some to mean that full conservation is paramount and regional councils should take no risks in the face of uncertainty. Others interpret the Magnuson-Stevens Fishery Conservation and Management Act (Magnuson-Stevens Act) as a mandate for maintaining harvest opportunity for commercial fisheries and vibrant recreational fisheries as the highest priority because of the substantial economic benefits provided to the nation. The role of the regional council is to balance these competing interests in a precautionary manner and develop sound management policies that provide the greatest overall benefit over time.

In the face of a crisis in the West Coast groundfish fishery, the Pacific Council has radically restructured commercial and recreational groundfish fisheries along the West Coast. Vast areas have been closed to protect depleted stocks; stringent gear restrictions are in effect; and harvest levels for many species are well below acceptable biological catch (ABC) levels. But these restrictions on harvest opportunity have come at a tremendous cost to recreational and commercial fisheries and fishing communities. Very little of this information is provided in the preliminary report.

Specific comments on Chapter 19 – “Achieving Sustainable Fisheries”

Recommendation 19-1 – would mandate and specify the role of the Scientific and Statistical Committee (SSC) in RFMC decision making, suggests SSC members be required to meet scientific and conflict of interest requirements, and SSC service should be compensated.

The Pacific Council agrees that RFMC decisions should be based on the best available scientific information, and, specifically, follow expert advice on matters of sound science. The SSC of the Pacific Council is an integral part of our management process. The USCOP recommendation to elevate the role of the SSC is consistent with our current standard operating procedure. Moreover, the SSC of the Pacific Council comprises scientists of the highest caliber, including senior level federal, state, and tribal agency scientists and internationally respected academic scientists. The SSC reviews baseline scientific data, ensures that the best available science is used, and provides recommendations from a sound scientific perspective. While the Pacific Council does not disagree that SSC service should be compensated, many SSC members are government or academic employees, and compensation would not necessarily need to be monetary. For example, the Pacific Council actively encourages federal, state, and tribal agencies to recognize SSC service in evaluating employee performance and promotion. The Pacific Council also encourages universities to consider SSC service of academic scientists during tenure review. The Pacific Council disagrees with the conflict of interest requirements as currently drafted in the USCOP report because they are too limited in scope. The Pacific Council does, however, agree SSC objectivity is paramount and assurances to avoid conflict of interest should be considered.

The Pacific Council also disagrees with the recommendation that the NOAA Administrator should make all SSC appointments. Each RFMC has unique needs for their SSC and are fully

qualified to assess those needs, make objective appointments, replace vacancies, and keep a fully functioning SSC seated in a timely manner.

Recommendation 19-2 – would require SSCs develop science information and determine ABC.

As stated, the Pacific Council agrees that RFMC decision making should be based on the best scientific information available, which is currently standard operating procedure for the Pacific Council. However, the Pacific Council disagrees that the SSC should be specifically mandated to develop scientific information. The Pacific Council management process uses scientific information collaboratively developed through the work of federal, state, and tribal agency scientists and academic scientists. This information is reviewed by independent experts and then both products are reviewed by the SSC. In terms of final review of science prior to Council use, the buck stops with the SSC. Specific to ABC values, the SSC reviews ABCs developed through the stock assessment and management specification process, which includes an outside review, but the SSC does not develop stock assessments. If these ABCs pass scientific muster, the SSC recommends their use by the Council. The SSC also describes uncertainty inherent to the ABC values and how this uncertainty should be factored into Council decision making. The Pacific Council does not set harvest levels above ABC.

Recommendation 19-3 – would require harvest levels to be set at or below ABC.

Currently, the Magnuson-Stevens Act requires that harvest levels (optimum yield [OY]) not be set above maximum sustainable yield (MSY). Generally, MSY is viewed as a fixed parameter of a population of fish. ABC values are estimated through an assessment of a stock of fish and, generally, set at or below MSY. OY values are then determined to set a harvest level in accord with scientific and economic information, fishery management needs (e.g., multi-species fishery effects), and socioeconomic needs of the fishery. In setting harvest levels, the Pacific Council heeds the advice of the SSC and does not set OY levels above the ABC. The USCOP recommendation, in its current form, does not account for the complexities and nuances of this science and policy development process. To reiterate, the Pacific Council agrees that harvest level decisions should be based on SSC recommendations. The Pacific Council does not set harvest levels above ABC.

Recommendation 19-4 – would require review of scientific information used by the RFMC.

The Pacific Council agrees that ensuring RFMC decisions are based on the best scientific information available is paramount. In collaboration with NMFS (and with SSC oversight), the Pacific Council established and uses a rigorous stock assessment development and review process, which includes Center For Independent Expert reviewers, prior to final SSC review. We do not believe it is useful to add further independent review of the SSC review, as this would delay the use of current science with little potential for improvements to the scientific information.

Recommendation 19-5 – would require deadlines for establishing ABC values; if deadline not met, regional science director (NMFS) would establish ABC values.

Congress established RFMCs, in part, to set allowable levels of harvest. The Pacific Council performs this fundamental responsibility in partnership with NMFS. The Pacific Council sets harvest levels using the most current and best available information as vetted by the SSC. The Pacific Council has also established strategic benchmarks, schedules, and protocols for developing timely and accurate scientific information. Thus, the Pacific Council process is in accord with the spirit of recommendation 19-5. However, in the Pacific Council context, it is not apparent that benefits would be gained by requiring NMFS to establish ABCs through the process envisaged in the USCOP recommendation. In sum, Congress established RFMCs to set harvest levels, the Pacific Council uses a sound standardized fishery specification setting process, and NMFS already has authority to intercede if an RFMC fails to meet Magnuson-Stevens Act and National Guideline mandates.

Recommendation 19-6 – would suspend a fishery if management specifications were not adopted in a timely and appropriate manner.

In the Pacific Council context, recommendation 19-6 is historically unnecessary, is redundant to the Magnuson-Stevens Act existing intervention authority, and, if adopted, would, in effect, penalize innocent fishery participants for bureaucratic ineptitude. As noted, the Pacific Council uses specific protocols for developing, reviewing, and adopting management specifications for each Council-managed fishery. Generally, these procedures are designed to facilitate the federal rulemaking process for reviewing and implementing fishery management regulations. For example, the Pacific Council adopts groundfish management specifications in June for implementation the following January. This timely process provides six months for NMFS to carry out proposed and final rulemaking prior to NMFS action to consider approval and implementation of the Council-recommended fishery specifications. Moreover, the Secretary of Commerce already has authority to intercede if a RFMC fails to act and/or if an RFMC action could jeopardize fishery conservation goals. The Pacific Council is opposed to this recommendation.

Recommendation 19-7 – would require RFMCs to annually develop prioritized lists of research and information needs.

The Pacific Council agrees with this recommendation. Through the SSC, the Pacific Council has a current protocol for developing a Research and Data Needs document, which outlines research and information priorities for each Council-managed fishery, on a biennial schedule. This document is a recommendation from the Council to NMFS for developing workload priorities and budgeting available resources. Conducting such an exercise on an annual basis is a sound recommendation.

Recommendation 19-9 – urges support for cooperative research.

The Pacific Council fully supports cooperative research efforts and agrees that such efforts offer a promising way to improve science while involving stakeholders in the management process. The Pacific Council supports the fishresearchwest.org website, which promotes cooperative research on the West Coast; and we are involved in other ongoing efforts to study and promote cooperative research.

Recommendation 19-15 – calls for Congress to amend the Magnuson-Stevens Act to affirm that fishery managers are authorized to institute dedicated access privileges.

The Pacific Council concurs with this recommendation.

The Pacific Council is currently early in the process of considering an individual quotas (IQ) program specifically for our limited entry groundfish trawl fishery. In the event, dedicated access privileges, or IQs, are analyzed to be an effective way to solve the problem of bycatch in a way that does not compromise other important fishery or socioeconomic goals, their implementation should be allowed. Also, RFMCs should be involved in development of national guidelines for IQ programs.

Recommendation 19-16 – calls for repealing programs that encourage overcapitalization in fisheries.

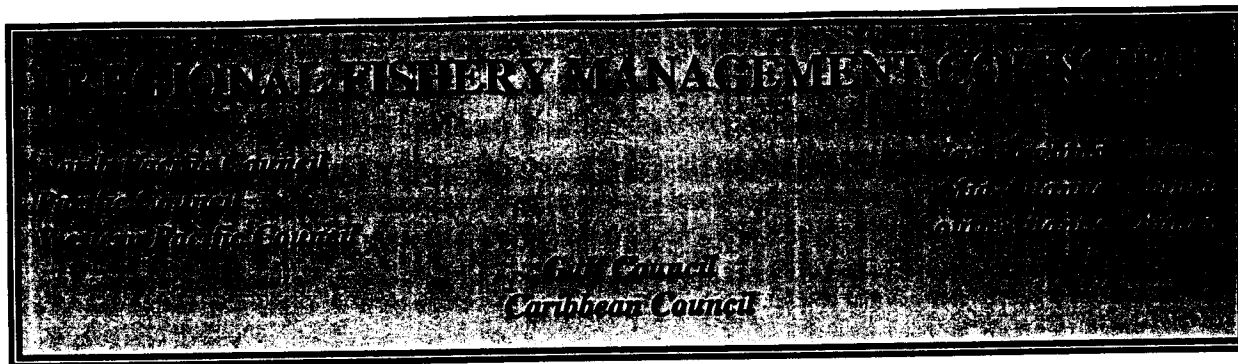
Again, the Pacific Council fully supports reducing capitalization and overcapacity. We agree in particular with the recommendation that NOAA monitor capacity reduction programs to ensure they meet their objectives. The Pacific Council has actively encouraged efforts to modify the Capital Construction Fund to create incentives for reducing fishing capacity.

Recommendation 19-17 – encourages Congress to increase funding for the Joint Enforcement Agreement.

The Pacific Council supports the Joint Enforcement Agreement, and we urge Congress to increase state funding for enforcement. A robust enforcement program is necessary to ensure compliance with current fishing regulations, which are very complex.

Recommendation 19-24 – calls for Congress to fully fund existing commitments to international fisheries management.

Such international efforts are vitally important for protecting straddling stocks. RFMCs should be included, along with the U.S. Department of State and NOAA, in these efforts, and RFMC participation in international management efforts should be supported with sufficient funding.



December 30, 2003

Admiral James D. Watkins (Ret.)
Chairman
Commission on Ocean Policy
1120 20th Street NW
Washington, DC 20036

Re: Marine Fishery Governance and the Concept of Separating Science from Management in the Regional Fishery Management Council Process

Dear Admiral Watkins:

Thank you for speaking at the recent national conference *Managing Our Nations Fisheries - Past, Present, and Future*. At the conference during a discussion of the merits of the concept of separating science from allocation and other fishery management activity, you stated there was serious consideration of a recommendation for institutional change from the status quo on this matter, but noted the Ocean Commission's recommendations had not been finalized. We would like to take this opportunity to encourage the Commission take a closer look at the issue of separating science from management in the eight Regional Fishery Management Councils (RFMCs).

Specifically, this letter describes our perspective on three points that we ask the Commission seriously consider prior to making a final recommendation on this important policy topic.

- The stated need for further separation of science from management is faulty.
- There are practical problems with institutionally separating science from management.
- A recommendation to achieve adequate separation within the existing RFMC framework.

The stated need for further separation of science from management is faulty.

A two-pronged argument has been provided as the basis for separating science from management at the RFMC level. The first claims that the Councils have a track record of exceeding the allowable catch determined by a rigorous scientific process, to the detriment of conservation. The second claims that a conflict of interest by voting Council members directly causes the setting of allowable catch levels higher than those recommended by scientific advisors. We

submit that the first reason is false, or at least an exaggeration of fact. With regard to the second reason, we are not aware of any evidence in the voting records showing federally appointed members bloc-voting against the government seats on the Councils to achieve an exceedance of scientifically determined catch levels. These claimed reasons are not only faulty, they also demonstrate a lack of recognition of the separation of science and management that currently characterizes most Council decision making. Further, the existing Magnuson-Stevens Fishery Conservation and Management Act (MSA) details U.S. Secretary of Commerce review safeguards that are entirely capable of preventing the alleged problems.

As an example of the exaggeration aspect of the stated problem, a recent Pew Trust funded report¹ released in November 2003 claimed that Councils "...raise the size of the catch – to the detriment of conservation."² This report uses king mackerel in the Gulf of Mexico Fishery Management Council (GFMC) forum as a general example, and the 1992-1993 king mackerel fishery as a "good example" of how RFMCs compromise conservation goals to set more generous fisheries. While it is true the GFMC adopted catch quotas higher than the mid point of the acceptable biological catch (ABC) range in most years from 1986-1999, they have never set an allowable catch level above the ABC in any year since 1986.³ Further, there is no mention in the Eagle et al. report of the uncertainties in the scientific recommendations, nor the fact that king mackerel populations have shown a steadily increasing trend since the late 1980s and are now above the overfishing and overfished thresholds. The Eagle et al. report also insinuates as proof that such examples are widespread, that (1) there are many stocks that have been designated as overfished across all RFMCs, and (2) that "NOAA does not claim that *any* of these stocks have been rebuilt to a level at which it can produce its MSY."⁴ (emphasis added). The fact that there were 20 stocks that were rebuilt to the MSY level between 1997 and 2002⁵, and an additional 2 in 2003, is in sharp contrast to the claim in the Eagle et al. report that there have

1/ Eagle, J., S. Newkirk, and B. H. Thompson Jr. Taking Stock of the Regional Fishery Management Councils. PEW Trust funded report released November 12, 2003.

2/ Eagle, et al., p. 2 and elsewhere in the report.

3/ Although in 1992-1993, the GFMC added 259,000 pounds to the commercial allocation of its previously set TAC of 7.8 million pounds, the quota was still well within the stock assessment range of 4.0-10.79 million pounds (see Table 1 of the 2002 Mackerel Stock Assessment Panel Report). Moreover, it appears that in Figure A on p. 15 of the Eagle et al. report (for the years 1992 through 1995) the authors erroneously represent the mid point of the ABC range as the ABC high point.

4/ Eagle, et al., p. 18-19.

5/ NOAA report to Congress. *Status of Fisheries in the United States*. April, 2002.

been none. Further, the report skirts the obvious logic gap that there are other reasons than Councils "...ignor(ing) the recommendations of the fishery scientists."⁶ that have caused fish stocks to be classified as overfished. Rather, a common cause in recent years for many overfished determinations has been revisions to the scientific assessment of current stock status and the acknowledgment that scientific advice in prior years lead to overly generous quotas.⁷ Inferences that there is a serious problem – serious enough to warrant congressional action – with Councils chronically setting higher catch levels than scientifically advised, is not true, or *at least* a blunt exaggeration of selected historical examples.

The claim of adverse conflicts of interest of certain seats on RFMCs causing conservation problems is not new, and can be presented in theoretical generalizations and simplistic soundbites such that a naive observer might be led to believe it to be true. However, proof that it causes a RFMC to compromise conservation would be vote logs; that is, a voting record showing Council members with something to personally gain from higher catch levels carrying a successful vote over those with nothing to personally gain that supported a lower harvest level as advised by science advisors. While we have not reviewed every Council vote since 1977, we are not aware of any such activity. The conflict of interest argument is faulty because cause and effect has not been shown.

Several things motivate against such bloc voting actually happening. First, there is a large proportion of government seats in each RFMC, filled by government officials with no direct financial relationship to the fishery. Second, the diversity between and among sport and commercial fishing industry representatives promotes against bloc voting on controversial issues. Also, the federally appointed non-government Council members are respected individuals

6/ Eagle, et al., p. 19

7/ In the case of West Coast groundfish, for example, the recent flurry of overfished designations for six rockfish species, lingcod, and Pacific whiting were generally the result of new scientific assessments that revised stock size and/or productivity downward and also indicated that allowable catches had been too high in earlier years, even though they had been set based on the best scientific information of the day. (Pacific Fishery Management Council. *The Council Family, Managed Fisheries, Current Issues, and Plans for the Future*. Prepared for the Conference *Managing Our Nations Marine Fisheries - Past, Present, and Future*. November 2003.) As another example, the Northwestern Hawaiian Islands lobster stocks have been managed using the best science available. In the 1980s, a dynamic production model developed by NMFS scientists was used to manage the fishery and provide input for a fishery harvest guideline. Unfortunately, the model was too simple and did not account for the effects of lobster recruitment from oceanic regime shifts, and the lobster population was severely depleted. Subsequent harvest models developed by NMFS generated much more conservative harvest guidelines, with only a ten percent risk of overfishing the stock.

nominated by the State Governors and selected by the U.S. Secretary of Commerce, and have shown integrity in voting for the long term sustainability of the fisheries. As a typical example, at the last Pacific Council meeting, federally appointed non-government Council members voted with the government representatives on the Council to close sport and commercial groundfish fisheries coastwide, in response to reaching the catch limit much earlier than expected. An additional reason the stated need for institutionally separating science from management is faulty is the mechanism in the MSA for Department of Commerce review and approval of Council actions. These reviews are comprehensive and lengthy, encompassing legal, policy and technical aspects. In the event there has been a Council action that is improper with regard to following strong scientific advice, or insufficiently precautionary when the science is uncertain, the Department of Commerce has the final say, and should not approve the Council action.

There are practical problems with separating science from management

There are times when hard scientific facts are clear and there are times when a scientific perspective on a key fishery management issue is soft, due to lack of data, inadequacies of analytical tools, and other reasons. In these cases where the science is weak and a decision is needed at that moment in time, completely separating science and policy decisions can be difficult. For example, the scientific advisors to the Pacific Council concluded that an estimate for a discard rate in a West Coast trawl fishery was not calculable based on data, but it was greater than the zero value in use at the time. They recommended that determination of this value was a policy decision best made by Council members based on anecdotal accounts, common sense, and their experience with the fishery. Based on this advice, the Council selected a generic rate that was used until observer data could provide direct estimates. With an institutional separation between science and management, how would that decision have been made? Another example entails situations where the scientific advisors present a broad range of equally probable estimates to be used to manage a fishery (not a point estimate and a probability range, but rather a range of equally probable values). The practical solution to this problem is a policy decision that takes into account the advice of people in the fishery and the general public about the full range of trade-offs involved in such a decision – the exact thing the RFMC were designed to accomplish. There are other examples where scientific input on conservation and allocation decisions seem inseparable from a practical standpoint, such as establishing the boundaries for closed areas or Marine Protected Areas (MPAs) or choosing between various bycatch reduction measures.

If there was a complete separation of science and management, how would recommendations based on weak science be distinguished from those based on strong science? Would such separation be only for stock size estimates and allowable catch quantities, or would it run the full scientific advice gamut through MPA boundaries to seemingly minutia issues such as the use of barbed or barbless hooks and their effect on total allowable catch? Would purely scientific fishery data be used in developing quota estimates, or would other factors be considered? How

would considerations of other factors, such as socioeconomic impacts to fishery dependent communities, be weighted?⁸ Would precautionary adjustments be included in the base science, and if so, to what degree? Would such decision making be conducted in a public forum? How would the historic and local knowledge of fishery participants be heard and considered in the scientific process? Would the final decision maker on such quasi-scientific, quasi-policy matters face the people effected by the decision and be subject to their logical challenges? These are some of the questions that reveal the genuine practical problems associated with an institutional separation of science and management.

A recommendation to achieve adequate separation within the existing RFMC framework.

At the national conference, there was discussion about the pattern of Councils characteristically following the advice of their scientific advisors when given reliable and current scientific information. There was speculation that this was correlated with strong Scientific and Statistical Committees (SSC) that meet in open sessions at the Council Meetings to provide final scientific advice to Councils. There was also speculation that the greatest concerns about separating science from management occurred in situations where there was no functional SSC or one that rarely met and not at Council meetings.

There are many current examples of strong SSC mechanisms that demonstrate successful integration of science and management. For example, the North Pacific Council, with a notably strong SSC and scientific advice development process, has never adopted a quota or catch level higher than the SSC recommendation. There are other examples of strong SSCs and Councils with a track record of following the advice of its scientific advisors.⁹ In these situations, the

8/ The Commission should be advised that scientific information for the social sciences is usually not available or very limited. In the RFMC fora, this has frequently necessitated defining these social issues from Advisory Panel statements, the public testifying before the Council, and the knowledge of the Council members who participate in the fisheries. Despite the fact this is anecdotal information, it is often the best available information.

9/ For example, the Pacific Council, with an SSC constituted of scientists from three Regional Fishery Science Centers, four state governments, tribes, academia, and the private sector, also has four specialized, fishery specific teams of advisory scientists. As another example, the Western Pacific Council's SSC has a strong international membership, including four scientists from Australia, the Secretariat of the Pacific Community in New Caledonia, the IATTC, and French Polynesia. Other members have worked extensively in the international realm of Pacific tuna fishery management, and are recognized experts in their respective fields. These Councils also have a track record of following the recommendations of their scientific advisors.

Admiral Watkins
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SSCs meet at Council Meetings, in open meetings that typically have public comment periods. Several of the Councils have three levels of scientific review of important stock assessments: the initial assessment, stock assessment panels that provide an independent scientific peer review function, and a subsequent review by the Council's SSC. Many say these Council structures provide for the proper degree of separation of science and management: strong initial scientific contributions, an independent review, a robust SSC final review, all done in an open, transparent process.

Therefore, we recommend:

- The Ocean Commission not recommend generically separating the scientific considerations in marine fishery management from the RFMC process.
- The Ocean Commission consider recommending strengthening the SSC composition and role in all RFMCs along the lines of the successful Council models that currently exist.
- We are opposed to a mechanism whereby all SSC members would be appointed by a National Marine Fisheries Service central authority.

In closing, we urge the Ocean Commission to make recommendations on this matter that do not throw the baby out with the bath water. If, in the past, there has been a problem with one or two Councils, once in a while, a significant revamping of the whole system is not called for. Overfished stocks have been rebuilt. Rebuilding plans are showing progress for others still listed as overfished. Healthy fish stocks are being managed wisely. The vagaries of nature and our understanding of it will always result in some level of uncertainty, no matter what system is in place. While the RFMC process may not be perfect and there is still considerable progress to be made, the process and the management results are improving. We feel the call to separate science from management in the RFMCs is unwise and should not be included in the Ocean Commission final recommendations.

Should you or the Ocean Commission staff have any questions on this matter, please don't hesitate to contact any of us. Dr. Donald McIsaac at the Pacific Council has been designated as the lead contact on these issues.

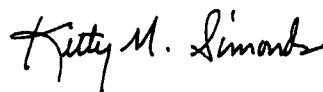
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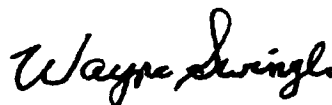
D. O. McIsaac, Ph.D.
Executive Director, Pacific Council



Chris Oliver
Executive Director, North Pacific Council



Kitty Simonds
Executive Director, Western Pacific Council



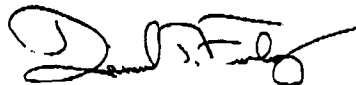
Wayne Swingle
Executive Director, Gulf Council



for Miguel Rolon
Executive Director, Caribbean Council



Paul Howard
Executive Director, New England Council



Daniel Furlong
Executive Director, Mid-Atlantic Council



Robert Mahood
Executive Director, South Atlantic Council

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c: Council Chairs and Vice Chairs
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