

November 16, 2023

The Honorable Gina Raimondo, Secretary  
U.S. Department of Commerce  
1401 Constitution Ave N.W.  
Washington, DC 20230

Dear Secretary Raimondo:

On behalf of the Marine Fisheries Advisory Committee (MAFAC), we request your attention and support for a long-term approach to bolster NOAA Fisheries data acquisition and management capabilities that are foundational to the Agency's climate, ecosystem, and fisheries management and services.

The MAFAC is a federal advisory committee composed of representatives from commercial and recreational fisheries, tribes, aquaculture groups, conservation interests, and marine resources professionals from around the U.S., charged with advising you on matters related to living marine resources. The priorities you have established in the Department of Commerce Strategic Plan and in your annual budgets for NOAA are vital to U.S. fishery dependent communities, the seafood industry, recreational and subsistence users, and national interests in maintaining resilient ocean ecosystems and seafood supply chains. However, MAFAC is concerned that the Administration's inadequate long-term budget planning exacerbates the challenge in securing sufficient funds through appropriations to fund marine survey and data management capabilities and is beginning to jeopardize NOAA's ability to support climate resilience and carry out a core aspect of its mission, sustainable management of our nation's marine resources.

NOAA's current approach to engaging on the President's budget process does not provide for multi-year fiscally informed budget scenarios needed to foster understanding and strategy to ensure marine surveys will be sufficiently resourced. Just like satellites, NOAA's use and maintenance of their vessel fleet and facilities requires commensurate budget planning and development to ensure the long-term nature of marine surveys and the underlying scientific capabilities required to execute them are also maintained.

Simply put, NOAA Fisheries lacks a long-term plan to adequately fund and carry out its core mission and services such as ecosystem data collection and stock assessments. Failure to adequately fund and implement efficient survey systems and data collection is having a detrimental impact and jeopardizes the future of fishing communities and the nation. These services are foundational to responsive conservation. An accompanying strategic communications plan should be developed alongside the fiscal plan.

**We urge your office to foster budget and fiscally informed 10-year planning and communications strategies to sustain NOAA Fisheries mission-critical functions, specifically to achieve science objectives that require continuity or expansion of data acquisition and management capabilities.**

**Three components, each representing a significant work stream, include:**

- 1) stabilizing aging vessels through planned Midlife Repair Periods;**
- 2) replacing capacity of end-of-life vessels (including Class C vessels, survey charter vessels, and cooperative research); and**
- 3) modernizing data integration and acquisition capabilities while resourcing a calibration and transition strategy to achieve anticipated efficiencies as data acquisition methods evolve.**

Risk management objectives across this complex set of projects with technical, fiscal, and operational uncertainty must be identified and communicated to internal and external stakeholders and Congressional appropriators.

MAFAC also requests Department support for **fully integrating a NOAA Fisheries Data Acquisition Plan (DAP) into the President's budget planning process** and Blue Book formulation. The DAP is expected to help the agency identify and plan for opportunities to pursue advanced data acquisition approaches such as the use of uncrewed systems, automated sampling, remote sensing, acoustics, molecular tools, electronic monitoring and reporting, and enhanced cooperative research opportunities. These will be critical components to expand the agency's data capacity to meet current and future needs. Additionally, the agency should work to evolve its functional planning and facilities resourcing budgeting processes and accompanying communications strategies, all further addressed below.

MAFAC's concerns leading to these recommendations have been brought to NOAA's attention by others over the past several years. Most notably, Congressional appropriators commissioned the National Academy of Public Administration to assess deficiencies in NOAA Fisheries' budget and planning processes; the report NAPA delivered in 2021 included the following recommendations on the topic of long-term planning for mission critical data acquisition and management:

NAPA recommendation #3:

#### Functional Planning

**Implement stronger functional planning.** *Functional planning includes operations (surveys, stock assessments, programs) and mission support (information technology, human resources, facilities). Each operational and mission support component should have functional plans, which integrate with the overall strategic planning process and account for budget out-years. Enhance assessment of the condition, cost of ownership, decommissioning and disposal costs, and deferred maintenance of facilities across NOAA Fisheries through long-term functional planning to better inform NOAA's Facility Capital Investment Plan (FCIP) and promote transparency. To this end, standardize processes for tracking facilities data across the FMCs, and collect those data centrally.*

NAPA recommendation #3.1:

#### Fish Surveys and Stock Assessments

*Produce and circulate **an annual fish survey and stock assessment priority list** to the following parties: all regional offices, all science centers, NOAA Fisheries leadership (including the budget office), NOAA leadership, Department of Commerce leadership, the Office of Management and Budget (OMB), **congressional appropriators, and all relevant external stakeholders. This sub-recommendation references Recommendation #5.3, to incorporate external stakeholder input into the building of the annual fish survey and stock assessment priority list.***

#### NAPA recommendation #4

##### Facilities Resourcing

**Request funding for the NOAA Fisheries facilities portfolio's requirements through NOAA and its Facility Capital Investment Plan by conducting robust assessments of the portfolio.** NOAA Fisheries should use its own functional facilities planning process and implementation strategy to assess the cost of ownership of its facilities portfolio, including deferred maintenance, and use that assessment to recommend a prioritization of facilities investments by NOAA. In communicating with NOAA, include suggestions on, and the costs associated with capital construction, renovation, renewal, and decommissioning or disposal. **Strong functional planning and communication by NOAA Fisheries, together with the efforts of other NOAA line offices, will support NOAA's efforts to secure sufficient appropriations for bureau-wide prioritization of capital investments.** Functional facilities planning and implementation will also benefit NOAA Fisheries' approach to address deferred maintenance, for which related expenses and resources should remain part of the ORF account. Use the effective practices and processes in Recommendation #3 to demonstrate efficiency, transparency, and sound process to NOAA, DOC, OMB, and congressional stakeholders.

#### NAPA recommendation #5.1

##### Congressional Communications

**Devise and implement a more robust and comprehensive congressional engagement strategy,** giving particular attention to providing insights into key elements of the budget. Areas of particular focus should include topics regularly raised by appropriators in the Joint Explanatory Statement. In addition, there should be greater clarity provided around mission delivery and mission support across program costs, including the process for determining administrative costs and facilities maintenance assessments applied to appropriated dollars, and what the amounts/percentages taken are. Communications with Congress should be done in close collaboration with NOAA and OMB.

#### NAPA recommendation #5.3

##### External Communications

Develop and implement a comprehensive external budgetary communications strategy. The strategy should include:

- Holding annual workshops with participation from Regional Fishery Management Councils (RFMCs), state fishery commissions, and other relevant external stakeholder groups to provide opportunities to offer their input for consideration in the NOAA Fisheries' budget process;
- Requiring strategic plans from each RFMC;
- Developing and issuing annual surveys to RFMC and other relevant external stakeholders soliciting feedback on accomplishments and impacts due to NOAA Fisheries' budget allocations; and
- Issuing, to the extent possible, the rationale for NOAA Fisheries' budgetary decision and subsequent analysis on the impacts of projects that go unfunded.

(See full [NAPA report. Highlighting the recommendations above does not imply a lack of support for the other recommendations in the report.](#))

Multi-year fiscally informed budget scenarios are critical for informed Congressional and stakeholder engagement in the budget process to understand the long-term tradeoffs and impacts on NOAA Fisheries core functions. The Communications teams within NOAA are valuable assets to ensure scenario planning and consequences of inadequate funding for core services are relatable and accessible to appropriators and the affected public.

The urgency of this matter has been well articulated by RFMCs. In a joint letter, the RFMCs recently called for use of IRA funds to fill shortfalls in data collection for marine fishery stock assessments. They note, “These assessments are critical for supporting a key element of the Blue Economy: commercial, recreational, and subsistence fishing that generated 1.8 million jobs and added \$117 billion to the nation’s economy in 2019... The importance of collecting these data and increasing funding for stock assessments cannot be overemphasized and should not be overshadowed by a focus on new technologies. Fisheries are on the front line of climate change. **Better data, and the ability to process that data efficiently, will reduce the uncertainty in our assessments, increase the adaptive capacity of the Councils and NMFS to respond to these changes, and ultimately increase the benefits to the nation from a thriving fishing industry, in all its forms.**” (See [CCC-NOAA Fisheries IRA letter.](#)) **MAFAC endorses use of IRA funds to bridge current gaps though calls for greater attention to the long-term fiscal strategy to execute NOAA Fisheries core mission and support public interests in our marine environment.**

MAFAC also strongly urges NOAA to consider ways to add adaptability and flexibility to survey planning to mitigate against uncertainties related to vessel operations, labor, and funding. These views have been well highlighted by the North Pacific Fishery Management Council, which noted, in response to lack of Bering Sea survey work completed in 2020:

*... [T]he survey plan for 2021 should provide for contingencies due to the uncertainties related to vessel operations, labor, and funding. Given the presentation received in June, it seems prudent to consider planning for more resiliency in the survey process surrounding labor, as this appeared to be a major impediment to undertaking surveys this year. We ask the [Alaska Fisheries Science Center] AFSC to explore all possible alternatives to avoid being in the same situation in 2021, for example, the use of federal fishery observers (as allowed under the observer contract), training other biologists from the AFSC to work at sea, obtaining field sampling assistance from scientists at other science centers or agencies, or contracting for at-sea scientific help. We also request the survey plan be clear about the funding scenario for 2021, including the status of funding saved from not undertaking surveys this year and the \$2 million received in Congressional appropriations specifically for maintaining historic survey coverage off the Pacific Northwest and Alaska in 2020. (Source: NPFMC letter to Dr. Robert Foy, Alaska Fisheries Science Center, dated July 14, 2020.)*

In order to continue carrying out mission-critical functions such as data collection and stock assessments, and to provide the best scientific information available for fisheries management, the MAFAC supports NOAA Fisheries to build clear, forward-looking budget and communications strategies with Department support to fully integrate a NOAA Fisheries Data Acquisition Plan into the President’s budget planning process. These strategies and planning documents should be flexible and adaptive to

urgent climate and ecosystem changes while integrating the recommendations outlined in the 2021 NAPA report. The MAFAC also recommends the agency utilize IRA funds to bridge current gaps to mission-critical functions. Together, these approaches can bolster NOAA Fisheries data acquisition and management capabilities that are foundational to the agency's climate, ecosystem, and fisheries management and services.

Respectfully,

Megan Davis  
Chair