



## ***Survey of NOAA Fisheries Service Employees***

### ***Selected Essays***

This is a sample of some of the most compelling or representative answers to the following survey question:

*34. The integrity of the scientific work produced by NOAA Fisheries could best be improved by*

The essay responses are sorted according to topic. Twenty-seven percent of survey recipients returned a completed survey, of which 61% provided written responses.

#### **I. NOAA Fisheries Has Become Political**

- Allowing staff to analyze the data and make their recommendations accordingly, without considering politics. It seems that we are encouraged to think too much about the consequences and how to get around them, rather than just basing our recommendations on the best available data.
- Removing political influence and strictly employing best commercially available, scientific data.
- Providing safe mechanisms for low-level staff to disagree with political appointees without the repercussion of job loss.
- While I have not been directed to alter data or information, it is not uncommon to be directed to not communicate debates in writing. I have also seen written documents that include internal discussions/debate purposefully omitted from administrative records, with no valid reasoning.
- Getting politics out of science and management decisions. Telling the truth about the science and management needed to bring back ESA species.
- Keeping politics out of science. Let science seek the truth and go where it leads. If the result is political[ly] unacceptable, then decision makers can make policy decisions that contradict the science, rather than trying to alter the science.

I indicated above that I haven't been directed to alter my findings. However, there has been pressure and suggestion. I maintain my job satisfaction by

working harder to develop more effective scientific opinions that are more resistant to policy over-rides. Gotta' out smart 'em!

- Expanding science coordination and organization among divisions and centers to reduce formulation of policy based on narrow views that appear to support political decisions.
- Discontinuing the process of appointing Regional Directors and State Directors through political nomination. Supervisors should advance through the system as biologists/scientists, not be placed there by the Party in office.
- Regional Administrators should be hired from civil service candidates, not political appointees.
- Removing the implication that an ESA Section 7 Jeopardy determination is never or almost never justified – this view is frequently held and expressed by managers.
- A huge problem is that a Sec. 7 consultation for ESA, whether the science is good or bad, that does not cause problems for an action agency is not heartily scrutinized. But a determination that results in more protection for the species and restricts an action agency or lengthens their timeline is always scrutinized and pressure may be applied to change the determination even if valid.
- Limiting influence of political appointees on scientists.
- Upper management relying more on science and less on politics to make key decisions when implementing our mandates (ESA, MMPA, MSA, NEPA, etc.).
- Following sound science and not bowing to political and financial pressures.
- Getting rid of managers that have been put in place because region/headquarters knows that they can be counted on to “play ball” [quotes in original] and not question dubious decisions made on the basis of political considerations, not science.
- Stronger leadership. Greater independence from public and political influence.
- Eliminate political appointees as agency leaders. Keep commercial and political interests out of the decision making process.
- OMB should stay out of NOAA decision making on scientific and policy issues – they should stick to budget. I really enjoy working for NOAA Fisheries; I think the climate here is much less controversial than DOI or EPA. However, it is sad that scientific decisions can be overrun by administrators and appointees.

- This Administration is by far the worst in my life with regard to natural resources protection, and yet somehow the public is generally unaware of this fact. Perhaps if it were addressed by the media or academia it would help improve our scientific integrity, not to mention our natural resources.

## **II. Industry Pressure**

- The scientific integrity of NMFS can be improved by getting industry and the Administration out of the AA and Regional Administrators offices. Also, take Protected Resources out of NMFS!! We are the fox watching (and killing) the henhouse.
- Removing the pressure to make findings that do not disrupt development or other activity that may harm populations.
- By keeping ESA critical habitat designations free from the influence of political appointees with strong ties to resource extraction industries.
- Always making decisions based on protection of marine resources and their habitat, rather than industry connection with higher NOAA/DOC administrators.
- A change in the current priorities and influence being exerted by the White House, which are extremely imbalanced, heavily favor industry over resource protection, and often disregard science when it supports management decisions that the White House disagrees with.

## **III. Fishery Management Councils Suffer from Conflicts of Interest**

- The Fisheries Council composition needs to be changed to put less emphasis on resource use.
- Altering the role of the fisheries mgt. councils, which have great power over decisions and research. The agency is ruled by the councils.
- Eliminating conflicts of interest in decision-making (e.g. Fishery Mgt. Council quota decisions), fire-walling scientific integrity of decisions in other manners.

## **IV. Lack of Transparency/Peer Review**

- Being more publicly available – even those of us within NOAA don't always know what kind of scientific work and publications NOAA is doing.
- Outside peer review before information is released to upper-level decision-makers.

- Independent Peer Reviews could greatly improve the scientific work of NOAA Fisheries. NOAA Fisheries strives for these reviews, but due to limited time and resources, does not always do so.
- Accurate reporting of results of this survey to press and journals. Continue to emphasize open and transparent process for ESA listing and delisting species.

#### **V. Insufficient Resources and Staff**

- Adequate funding and staff, commensurate with mission and mandates.
- Increasing funding and staff to conduct the scientific investigations needed to base effective management decisions, as well as implement those management decisions.
- The integrity of the scientific work produced by NOAA is sound, given the amount of resources we have to work with. Of course the science would be better with more resources (to do more surveys etc.).
- The integrity of the scientific work produced by NOAA Fisheries can be greatly improved by hiring more conservation biologists and ecologists.
- Adding staff and budget so we have the information required to do our jobs. Right now the lack of focused research hurts us in many arenas, especially those related to the habitats that support harvested and protected species.
- We need more resources for research and resource surveys. There is a lot we don't know about fish stocks, [essential fish habitat] and protected species. We also need more resources to analyze the impacts of our proposed action. We only seem to do our best and most careful work when being sued. We should do high caliber analysis on all actions, not just court mandated.
- Increased funding (staffing). We have lost several positions in the past three years. Before that attrition began, staffing was inadequate. Species recovery, water rights, timber harvest, major river screening projects, FERC licensing, field surveys and many other program initiatives are essentially the responsibility of only one (or if you're lucky two) person(s). Statewide [emphasis in original] or regionwide programs staffed with only one or two people are bound to be ineffective. Yet management can point to each inadequately staffed program and claim that they have persons engaged in that arena.
- Having the AA not be a political appointee, and giving NOAA Fisheries more discretion over how it spends appropriated funds (as opposed to the excessive level of earmarks), and providing funds to cover increased costs due to inflation.

#### **VI. Greater Professional Resources and Development**

- Encouraging (& funding) participation in scientific societies.
- Training is a serious shortcoming in some divisions, both leadership/management, and professional/technical.
- Redefining our jobs to include and support field investigations, the development of analytical tools to support our consultations, recovery planning, and enforcement.
- Improved training/professional opportunities; Train mid-level and upper level managers w/ people skills and updated scientific approaches.

## **VII. Enhanced Focus on Research and/or Conservation**

- The agency needs to promote a better conservation mandate rather than “customer service and satisfaction” approach. The fish can easily lose under the fast and efficient processing of permits that is frequently asked for. Additionally, there is a reluctance of management to ask for the necessary scope of effects analyses that applicants are required to conduct under ESA.
- Of late, increased emphasis on homeland security has overruled environmental concerns (e.g. Navy operations impact on marine mammals and other protected species).
- Improved data from science based research in areas and on species that are less well researched – from this improved and more informed management decisions may be made.
- What is desperately needed is research on the ecological (food chain) role of diadromous (anadromous) fish in the southeast. These are key to any recovery of many managed species and NMFS does almost nothing to foster their recovery.

## **VIII. Organizational Issues**

- Reorganization and elimination of redundancy. Removal from Department of Commerce.
- Move the boundary between regular civil service and political appointees back up to the Dept. of Commerce, and out of NMFS. Regional Administrators, in particular, should not be political appointees.
- Encouraging open discussion between staff and management on identifying shortcomings of current science/policy/analytical approaches to satisfying protection and recovery requirements of ESA.

- Expanding science coordination and organization among divisions and centers to reduce formulation of policy based on narrow views that appear to support political decisions.
- Less centralized authority, or more supervisors. Also, staff should sign, or at least have name recognition, on Biological Opinions they author.
- NOAA Fisheries scientific work would greatly benefit from larger coordination in NOAA, between other agencies, states, academia, Industry and NGOs. Thus pooling resources, getting greater buy into science and reducing duplication of efforts.
- Stop reorganizing! [Emphasis in original] Establish a mandate that agency structure remain fixed for 20 years. Any necessary changes being made at those intervals.
- Increased communication between science centers and field offices.

#### **IX. Other**

- Removing a reward system that emphasizes the number of Section 7 projects completed, rather than the quality of the work.
- Incorporate Ocean Commissions recommendations.
- Return millions of dollars sent to states and tribes under the Pacific Coastal Salmon Recovery Fund and let NOAA Fish habitat professionals set realistic (not political) priorities for restoration.
- Additional willingness to look at the big picture and be proactive on regional scales, rather than exclusively reactive – this may require greater flexibility and mandate under existing regulatory frameworks.