



February 2, 2026

Caribbean

Miguel Rolón
Executive Director
Carlos Farchette
Chair

Gulf

Dr. Carrie Simmons
Executive Director
Jonathan Dugas
Chair

Mid-Atlantic

Dr. Christopher Moore
Executive Director
Joseph Cimino
Chair

New England

Dr. Cate O'Keefe
Executive Director
Daniel Salerno
Chair

North Pacific

Diana Evans
Executive Director
Angel Drobnic
Chair

Pacific

Merrick Burden
Executive Director
Pete Hassemer
Chair

South Atlantic

John Carmichael
Executive Director
Trish Murphy
Chair

Western Pacific

Kitty Simonds
Executive Director
Nathan Ilaoa
Chair

Mr. Eugenio Piñeiro Soler
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910
Via email: eugenio.e.pineirosoler@noaa.gov

Dear Mr. Piñeiro Soler:

On behalf of the Council Coordination Committee (CCC), we write to convey the CCC's concerns with NMFS proposed "Framework for Narrowing the Scope of NMFS Management and Science" through application of the Risk/Value Matrix.

The CCC has considered this issue carefully over the course of several recent discussions, including presentations from NMFS Headquarters and subsequent deliberations among Council Executive Directors. While the CCC supports constructive dialogue regarding capacity constraints and opportunities to improve the effectiveness and efficiency of fishery management and science, we have significant concerns regarding both the process used to develop the Risk/Value Matrix and the implications of the framework as currently framed.

First, the Councils have not been adequately consulted or involved in the development of the Risk/Value Matrix or its underlying methodology. Councils were asked to react to, and potentially apply, a framework that appears to have been substantially developed in advance, including embedded assumptions regarding objectives, priorities, and acceptable tradeoffs. Engagement at this stage risks being perceived as endorsement of a predetermined methodology rather than meaningful collaboration. This approach does not align with the Councils' statutory role under the Magnuson-Stevens Fishery Conservation and Management Act.

Second, the CCC is concerned that the Risk/Value Matrix appears likely to function as a de facto prioritization tool for stock assessments, monitoring, and associated scientific resources, with potential implications for the allocation of funding among NMFS Regions and Science Centers. As described to the CCC, the framework could materially influence decisions regarding which stocks warrant continued assessment or management. These decisions have traditionally—and appropriately—been informed by Councils through transparent, public processes grounded in regional contexts. The CCC is concerned that adoption of the Risk/Value Matrix could diminish or displace meaningful Council and constituent input into decisions fundamental to fisheries science and management.

Third, the implications of the framework remain unclear, but several Councils have identified substantive concerns when attempting to apply the Risk/Value criteria to their fisheries. For example, in some cases, it appears that stocks with little or no fishing-related mortality would be categorized as "high value" for management based on their ecosystem role, raising fundamental questions about what management actions would follow and what management problem the framework is intended to address. These outcomes suggest that the Risk/Value Matrix incorporates policy choices and management objectives that have not been discussed with, or agreed to, by the Councils.

Fourth, the CCC notes that similar national-level stock or assessment prioritization concepts have been proposed previously and were not supported by Councils, in part because such approaches shifted decision-making away from established regional fishery management processes. The current Risk/Value Matrix appears, in important respects, to revisit those concepts without addressing the concerns previously raised by the Councils.

Finally, the CCC is concerned about the compressed timeline proposed for Council engagement, the lack of clarity regarding current and future resource levels, and uncertainty regarding how Council input would ultimately be used. Councils are already pursuing scope-reduction, prioritization, and efficiency efforts through Magnuson-Stevens Act-compliant public processes. Participating in a parallel national exercise under the current conditions creates a risk that Council input could be used to justify predetermined outcomes or become binding regardless of future budget realities.

For these reasons, the CCC requests further discussions regarding capacity constraints, optimization of management systems, and long-term sustainability of fisheries science and management. Specifically, the CCC requests that NMFS clarifies in writing:

1. What specific decisions the Risk/Value Matrix is intended to inform or support;
2. What alternative management approaches NMFS envisions could be applied to the Risk/Value matrix quadrants and how they can be implemented in accordance with MSA and other guidance;
3. How the Councils' statutory role in fisheries management and science prioritization would be preserved under this approach; and
4. Whether any decisions influenced by the Risk/Value Matrix could proceed without Council concurrence.

Clarification of these issues is essential to understanding the purpose, scope, and governance implications of the proposed framework.

We appreciate the opportunity to convey the CCC's concerns and look forward to continued dialogue with NMFS leadership on approaches that appropriately respect the Councils' role while addressing shared challenges.

Sincerely,

Council Chairs and Executive Directors:

New England

Chair: Daniel Salerno
Executive Director:
Dr. Cate O'Keefe

Mid Atlantic

Chair: Joe Cimino
Executive Director:
Dr. Christopher Moore

South Atlantic

Chair: Trish Murphey
Executive Director:
John Carmichael

Gulf

Chair: Jonathan Dugas
Executive Director:
Dr. Carrie Simmons

Caribbean

Chair: Carlos Farchette
Executive Director:
Miguel Rolón

Western Pacific

Chair: William Sword
Executive Director:
Kitty Simonds

Pacific

Chair: Pete Hassemmer
Executive Director:
Merrick Burden

North Pacific

Chair: Angel Drobnica
Executive Director:
Diana Evans

Cc: Mr. Sam Rauch
Ms. Kelly Denit