ATLANTIC STATES MARINE FISHERIES COMMISSION

Five-Year Strategic Plan 2024-2028



The nation behaves well if it treats the natural resources as assets which it must turn over to the next generation increased and not impaired in value.

Theodore Roosevelt

Introduction

Each state has a fundamental responsibility to safeguard the public trust with respect to its natural resources. Fishery managers are faced with many challenges in carrying out that responsibility. Living marine resources inhabit ecosystems that cross state and federal jurisdictions. Thus, no state, by itself, can effectively protect the interests of its citizens. Each state must work with its sister states and the federal government to conserve and manage natural resources.

Beginning in the late 1930s, the 15 Atlantic coastal states from Maine to Florida took steps to develop cooperative mechanisms to define and achieve their mutual interests in coastal fisheries. The most notable of these was their commitment to form the Atlantic States Marine Fisheries Commission (Commission) in 1942, and to work together through the Commission to promote the conservation and management of shared marine fishery resources. Over the years, the Commission has remained an effective forum for fishery managers to pursue concerted management actions. Through the Commission, states cooperate in a broad range of programs including interstate fisheries management, fisheries science, fishery-dependent and fishery-independent data collection and management, habitat conservation, and law enforcement.

Congress has long recognized the critical role of the states and the need to support their mutual efforts. Most notably, it enacted the Atlantic Coastal Fisheries Cooperative Management Act (Atlantic Coastal Act) in 1993, which built on the success of the Atlantic Striped Bass Conservation Act of 1984. Acknowledging that no single governmental entity has exclusive management authority for Atlantic coastal fishery resources, the Atlantic Coastal Act recognizes the states' responsibility for cooperative fisheries management through the Commission. The Atlantic Coastal Act charges all Atlantic states with implementing coastal fishery management plans that will safeguard the future of Atlantic coastal fisheries in the interest of both fishermen and the nation.

Accepting these challenges and maintaining their mutual commitment to success, the Atlantic coastal states have adopted this five-year Strategic Plan. The states recognize circumstances today make the work of the Commission more important than ever before. The Strategic Plan articulates the mission, vision, goals, and objectives needed to accomplish the Commission's mission. It serves as the basis for annual action planning, whereby Commissioners identify the highest priority issues and activities to be addressed in the upcoming year. With the Commission currently coordinating the management of 27 species/species complexes , finite staff time, Commissioner time and funding, as well as a myriad of other factors impacting marine resources (e.g., ocean conditions, protected species interactions, offshore energy, and aquaculture), Commissioners recognize the absolute need to prioritize activities, dedicating staff time and resources where they are needed most and addressing less pressing issues as resources allow. Efforts will be made to balance the competing needs of stability/predictability in fisheries management and the necessity for adaptability to respond to fishery and environmental conditions. A key to prioritizing issues and maximizing

efficiencies will be working closely with the three East Coast Regional Fishery Management Councils, NOAA Fisheries, US Fish and Wildlife Service and US Geological Survey.

Mission

The Commission's mission, as stated in its 1942 Compact, is:

To promote the better utilization of the fisheries, marine, shell and anadromous, of the Atlantic seaboard by the development of a joint program for the promotion and protection of such fisheries, and by the prevention of physical waste of the fisheries from any cause.

The mission grounds the Commission in history. It reminds every one of the Commission's sense of purpose that has been in place for over 82 years. The constantly changing physical, political, social, and economic environments led the Commission to restate the mission in more modern terms:

To promote cooperative management of marine, shell and diadromous fisheries of the Atlantic coast of the United States by the protection and enhancement of such fisheries, and by the avoidance of physical waste of the fisheries from any cause.

The mission and nature of the Commission as a mutual interstate body incorporate several guiding principles. They include:

- States are sovereign entities, each having its own laws and responsibilities for managing fishery resources within its jurisdiction
- > States serve the broad public interest and represent the common good
- Multi-state resource management is complex and dependent upon cooperative efforts by all states involved
- The Commission provides a critical sounding board on issues requiring crossjurisdictional action, coordinating cooperation, and collaboration among the states and federal government, including NOAA Fisheries, US Fish and Wildlife Service, and US Geological Survey.

Vision

The long-term vision of the Commission is:

Sustainable and Cooperative Management of Atlantic Coastal Fisheries

Values

The Commission and its member states have adopted the following values to guide its operations and activities. These values affirm the Commission's commitment to sustainable fisheries management for the benefit of all fisheries participants and coastal communities. They also acknowledge the growing importance of managing fisheries in a more holistic and adaptive way, seeking solutions to cross-cutting resource issues that lead to long-term ecological and socioeconomic sustainability.

- > Effective stewardship of marine resources through strong partnerships
- Decisions based on sound science
- Long-term ecological sustainability
- > Transparency and accountability in all actions
- > Timely response to new information through adaptive management
- > Balancing resource conservation with the economic success of coastal communities
- > Efficient use of time and fiscal resources
- > Work cooperatively with honesty, integrity, and fairness

Driving Forces

The Commission and its actions are influenced by a multitude of factors. These factors are constantly evolving and will most likely change over the time period of this Strategic Plan. However, the most pressing factors affecting the Commission today are the state of the marine environment, fisheries, and coastal communities; resource allocation; the quality and quantity of scientific information; competing ocean uses; a growing need to address ecosystem functions; and interactions between fisheries and protected species. The Strategic Plan, through its goals and broad objectives, will seek to address each of these issues over the next five years.

The Marine Environment

Fluctuating ocean temperatures, sea level rise, and ocean acidification affect nearly every facet of fisheries resources and management at the state, interstate, and federal levels. Potential impacts to marine species include degraded water quality, altered prey and habitat availability, susceptibility to disease, changing migration patterns, and changes to spawning and reproductive potential. It is often difficult for fisheries stock assessments and management to keep pace with changes in distribution and productivity of fishery stocks. Several Commission species, such as northern shrimp, American lobster, Atlantic cobia, Atlantic croaker, Atlantic striped bass, Spanish mackerel, black sea bass, and summer flounder are already responding to changes in the ocean. In the case of northern shrimp and American lobster, current ocean temperatures have created inhospitable environments for reproduction and survivability in some areas. For cobia, black sea bass, and summer flounder, these factors have contributed to altered species distributions, with some species expanding their ranges and others moving into deeper and/or more northern waters to stay within preferred temperature ranges. Where shifts are occurring, the Commission may need to

reconsider state-by-state allocation schemes and make adjustments to our fishery management plans (FMPs). For other species depleted due to factors other than fishing mortality (e.g., habitat degradation and availability, predation), the states will need to explore steps to aid in species recovery. And, if a stock's viability is compromised, Commission resources and efforts should be shifted to other species that can be rebuilt or sustainably maintained.

Since 2021, the Commission and other marine fishery management organizations along the US East Coast have been exploring governance and management issues related to evolving ocean conditions and fishery stock distributions. This effort recognizes the need to plan for how fishery management organizations and coastal communities can best adapt to environmental changes in a thoughtful and deliberate way. Over the span of this Strategic Plan and beyond, the Commission and other East Coast marine fishery management organizations will be prioritizing actions around three overarching themes of cross-jurisdictional governance; managing under increased uncertainty; and data sources and partnerships to plan for possible future outcomes.

Allocation

Resource allocation among the states and between various user groups will continue to be an important issue over the next five years. Many of the Commission FMPs divvy up the available harvestable resource through various types of allocation schemes, such as by state, region, season, or gear type. The changing distribution of many species has further complicated the issue of resource allocation with traditional allocation schemes being challenged and a finite amount of fishery resources to be shared. Discussion may be difficult and divisive, with some states (and their stakeholders) wanting to maintain their historic (traditional) allocations, while others are seeking a greater share of the resource given increased abundance and availability in their waters. States will need to seek innovative ways to reallocate species so that collectively all states feel their needs are met. What will be required to successfully navigate these discussions and decisions is the commitment of the states to work through the issues with honesty, integrity, and fairness, seeking outcomes that balance the needs of the states and their stakeholders with the ever-changing realities of shifting resource abundance and availability.

Science as the Foundation

Accurate and timely scientific information form the basis of the Commission's fisheries management process. Continued investments in the collection and management of fisherydependent and -independent data remain a high priority for the Commission and its member states. The challenge will be to maintain and expand data collection efforts in the face of shrinking state and federal budgets. Past and current investments by state, regional and federal partners have established the Atlantic Coastal Cooperative Statistics Program (ACCSP) as the principal source of marine fishery statistics for the Atlantic coast. State and regional fisheryindependent data collection programs, in combination with fishery statistics, provide the scientific foundation for stock assessments. Many data collection programs will continue to be strained by budget restrictions, scientists' workload capacities, and competing priorities. The Commission remains committed to pursuing long-term support for research surveys and monitoring programs that are critical to informing management decisions and resource sustainability.

Ecosystem Functions

Nationally, there has been a growing demand for fisheries managers to address broader ecosystem functions such as predator-prey interactions and environmental factors during their fisheries management planning. Ecosystem science has improved in recent years, though the challenges of comprehensive data collection continue. While the majority of the Commission's species are managed and assessed on a single species basis, there have been significant advancements in the development and use of ecological reference points for Atlantic menhaden management. Horseshoe crabs of Delaware Bay origin are also managed in an ecosystem context to account for the forage needs of migratory shorebirds. The Commission remains committed to seeking ecological sustainability over the long-term through continuing its work on multispecies assessment modeling and the development of ecosystem-based reference points in its fisheries management planning process.

Competing Ocean Uses

Marine spatial planning has become an increasingly popular method of balancing the growing demands on valuable ocean resources. More specifically, the competing interests of commercial and recreational fishing, offshore energy development, aquaculture, marine transportation, offshore oil exploration and drilling, military needs, and habitat restoration are all components that must be integrated into successful ocean use policies. The Commission has always emphasized cooperative management with our federal partners; however, the states' authorities in their marine jurisdictions must be preserved and respected. The Commission will continue to prioritize the successful operation of its fisheries, but it will be imperative to work closely with federal, state, and local governments on emerging ocean use conflicts as they diversify into the future.

Protected Species

Like coastal fishery resources, protected species, such as marine mammals, sea turtles, and listed and candidate fish species, traverse both state and federal waters. The protections afforded these species under the Marine Mammal Protection Act and Endangered Species Act can play a significant role in the management and prosecution of Atlantic coastal fisheries. The Commission and the states have a long history of supporting our federal partners to minimize interactions with and bycatch of marine mammals and sea turtles. The listing of Atlantic sturgeon under the Endangered Species Act has added a whole new level of complexity in the ability of the Commission's member states to carry out their stewardship responsibilities for this important diadromous species. The species spends the majority of its life in state waters and depend on estuarine and riverine habitat for their survival. Listing has the potential to jeopardize the states' ability to effectively monitor and assess stock condition, as well as impact fisheries that may encounter listed species. It is incumbent upon the Commission and its federal partners to work jointly to assess stock health, identify threats, and implement effective rebuilding programs for listed and candidate species through the state and federal process. More recently, the depleted status of the Northern right whale population and the potential impacts to this population by entanglement in fishing gear, particularly lobster and crab gear, has heighted concern for both whales and the lobster industry.

Increased Cooperation and Collaboration among the States and between the States and Our Federal Partners

Demands for ecosystem-based fisheries management, competing and often conflicting ocean uses, and legislative mandates to protect marine mammals and other protected species further complicate fisheries management and require quality scientific information to guide management decisions. Federal agencies have a long track record of providing scientific support to the Commission and collaborations recently expanded in some areas. However, there is a developing trend of reduced support for fundamental data collection and assessment support. Year to year static funding results in decreased scientific support due to inflationary cost increases. There is a growing concern among fishery managers that some "control" over fisheries decisions and status has been diminished by limited data collection efforts and our inability to effect environmental factors that impact marine resources. Fisheries management has never been more complex or politically charged. State members are pulled between what is best for their stakeholders versus what is best for the resource and the states as a whole.

While the issues may seem daunting, they are not insurmountable. In order for the Commission to be successful, the states must recommit to their collective vision of "Sustainable and Cooperative Management of Atlantic Coastal Fisheries," recognizing that their strength lies in working together to address the fisheries issues that lie ahead. Given today's political and environmental realities, the need for cooperation among the states has never been more important. It is also critical the states and their federal partners seek to strengthen their cooperation and working relationships, providing for efficient and effective fisheries management across all agencies. No one state or federal agency has the resources, authority, or ability to do it alone.

GOALS & OBJECTIVES

The Commission will pursue the following eight goals and their related strategies during the five-year planning period from 2024 through 2028. It will pursue these goals through specific objectives, targets, and milestones outlined in an annual Action Plan, which is adopted each year at the Commission's Annual Meeting to guide the subsequent year's activities. Throughout the year, the Commission and its staff will monitor progress in meeting the Commission's goals, and evaluate the effectiveness of the strategies. While committed to the objectives included in this plan, the Commission is ready to adopt additional objectives to take advantage of new opportunities and address emerging issues as they arise.

Goal 1 – Rebuild, maintain, fairly allocate, and promote sustainable Atlantic coastal fisheries

Goal 1 focuses on the responsibility of the states to conserve and manage Atlantic coastal fishery resources for sustainable use. Commission members will advocate decisions to achieve the long-term benefits of conservation, while balancing the socioeconomic interests and needs of coastal communities. Inherent in this is the recognition that healthy and vibrant resources benefit stakeholders. The states are committed to proactive management, with a focus on integrating ecosystem services, socioeconomic impacts, habitat issues, bycatch and discard reduction measures, and protected species interactions into well-defined fishery management plans. Fishery management plans will also address fair allocation of fishery resources among the states. Understanding evolving ocean ecosystems and their impacts on fishery productivity and distribution is an elevated priority. Successful management in an evolving marine environment will depend not only on adjusting management strategies to be more adaptable and flexible, but also in reevaluating and revising, as necessary, the underlying conservation goals and objectives of fishery management plans. Current ocean conditions have a significant impact on fish stocks, fish habitats, and interactions between species and fisheries. The Commission state members will strive to proactively consider ecosystem level impacts when making management decisions to take a more holistic consideration of issues. Improving cooperation and coordination with federal partners and stakeholders can streamline efficiency, transparency and, ultimately, success. In the next five years, the Commission is committed to ending overfishing and working to rebuild overfished Atlantic coast fish stocks, while promoting sustainable harvest of and access to rebuilt fisheries. Where possible, the Commission will seek to aid in the rebuilding of depleted stocks, whose recovery is hindered by factors other than fishing pressure.

Annual action planning will be guided by the following objectives:

- Manage interstate resources that provide for productive, sustainable fisheries using sound science
- Strengthen state and federal partnerships to improve comprehensive management of shared fishery resources
- Create management frameworks that allow for increased resiliency and adaptability to environmental factors
- Practice efficient, transparent, and accountable management processes
- Evaluate progress towards rebuilding fisheries
- Promote sustainable harvest of and access to rebuilt fisheries
- Strengthen interactions and input among stakeholders, technical, advisory, and management groups
- Develop criteria for prioritizing management actions for species that are depleted due to factors other than fishing mortality
- Include environmental considerations in our management strategies

Goal 2 – **Provide robust, actionable science to inform management decisions**

Sustainable management of fisheries relies on accurate and timely scientific advice. The Commission strives to produce robust, actionable science through a technically rigorous, independently peer-reviewed stock assessment process. Assessments are developed using a broad suite of fishery-independent surveys and fishery-dependent monitoring, as well as research products developed, in cooperation with the fishing industry, by a broad network of fisheries scientists at state, federal, and academic institutions along the coast. This goal encompasses the development of novel and innovative scientific research, modern assessment methodology, and enhancement of the states' stock assessment capabilities. It provides for the administration, coordination, and expansion of collaborative research and data collection programs. Achieving the goal will ensure robust science is available as the foundation for the Commission's evaluation of stock status and adaptive management actions.

Annual action planning will be guided by the following objectives:

- Proactively address research priorities through cooperative state and regional data collection programs; strengthen stakeholder involvement in collaborative research projects
- Explore the use of emerging technologies to improve fishery-independent surveys, monitoring, and the timeliness of scientific products
- Provide training to enhance the expertise and participation of state and staff scientists in conducting stock assessments
- Streamline assessment data assimilation within individual states, and among states and the Commission
- Conduct stock assessments based on comprehensive data sources and rigorous technical analysis; deliver direct, concise scientific advice in order to achieve clear endpoints in the assessment process; generate indicators/rapid assessments for all stocks
- Balance requests from fisheries management with finite assessment workload capacity
- Support the development and utilization of industry-based surveys and other cooperative research opportunities.
- Integrate estuarine/state waters and federal waters environmental data for use in stock assessments to inform fisheries management decisions
- Communicate with stakeholders to ensure scientific advice and on-the-water observations are consistent
- Characterize the risk and certainty associated with the scientific advice provided to decision-makers
- Explore the use of management strategy evaluations to inform management decisions

Goal 3 – Produce dependable and timely marine fishery statistics for Atlantic coast fisheries

Effective management depends on quality fishery-dependent data to inform stock assessments and fisheries management decisions. Goal 3 focuses on providing timely, accurate catch, effort, and biological data on Atlantic coast recreational, for-hire, and commercial fisheries to support fisheries management.

This goal seeks to accomplish this through the activities of the Atlantic Coastal Cooperative Statistics Program (ACCSP), a cooperative state-federal program that designs, implements, and conducts marine fisheries statistics data collection programs and integrates those data into data management systems that will meet the needs of fishery managers, scientists, and fishermen. ACCSP partners include the 15 Atlantic coast state fishery agencies, the three Atlantic Coast Fishery Management Councils, the Potomac River Fisheries Commission, NOAA Fisheries, the US Fish and Wildlife Service, and the US Geological Survey.

Annual action planning will be guided by the following objectives:

- Focus on activities that maximize benefits, are responsive and accountable to partner and end-user needs, and are based on available resources
- Develop, implement, and maintain coastwide data standards through cooperation with all program partners
- Provide electronic applications that efficiently align partner data collection
- Integrate and provide access to partner data via a coastwide repository
- Facilitate fisheries data access through an on-line, user-friendly system while protecting confidentiality
- Support data systems modernization and integration

Goal 4 – Protect and enhance fish habitat and ecosystem health through partnerships and education

Goal 4 aims to conserve and improve coastal, marine, and riverine habitat to enhance the benefits of sustainable Atlantic coastal fisheries and resilient coastal communities in the face of changing ecosystems. Habitat loss and degradation have been identified as significant factors affecting the long-term sustainability and productivity of our nation's fisheries. The Commission's Habitat Program develops objectives, sets priorities, and produces tools to guide fisheries habitat conservation efforts directed towards ecosystem-based management.

The challenge for the Commission and its state members is maintaining fish habitat under limited regulatory authority for habitat protection or enhancement. Therefore, the Commission will work cooperatively with state, federal, and stakeholder partnerships to achieve this goal. Much of the work to address habitat is conducted through the Commission's Habitat and Artificial Reef Committees. In order to identify fish habitats of concern for Commission managed species, each year the Habitat Committee reviews existing reference documents for Commission-managed species to identify gaps or updates needed to describe important habitat types and review and revise species habitat factsheets. The Habitat Committee also publishes an annual issue of the *Habitat Hotline Atlantic*, highlighting topical issues that affect all the states.

The Commission and its Habitat Program endorses the National Fish Habitat Partnership, and will continue to work cooperatively with the partnership to improve aquatic habitat along the Atlantic coast. Since 2008, the Commission has invested considerable resources, as both a partner and administrative home, to the Atlantic Coastal Fish Habitat Partnership (ACFHP), a coastwide collaborative effort to accelerate the conservation and restoration of habitat for native Atlantic coastal, estuarine-dependent, and diadromous fishes. As part of this goal, the Commission will continue to provide support for ACFHP, under the direction of the National Fish Habitat Partnership Board.

Annual action planning will be guided by the following objectives:

- Identify fish habitats of concerns through fisheries management programs and partnerships
- Educate Commissioners, stakeholders, and the general public about the importance of habitat to healthy fisheries and ecosystems
- Better integrate habitat information and data into fishery management plans and stock assessments
- Engage local, state, and regional governments in mutually beneficial habitat protection and enhancement programs
- Foster partnerships with management agencies, researchers, and habitat stakeholders to leverage scientific, regulatory, political, and financial support
- Work with ACFHP to foster partnerships with like-minded organizations at local levels to further common habitat goals

Goal 5 – Promote compliance with fishery management plans to ensure sustainable use of Atlantic coast resources

Fisheries managers, law enforcement personnel, and stakeholders have a shared responsibility to promote compliance with fisheries management measures. Activities under this goal seek to increase and improve compliance with fishery management plans. This requires the successful coordination of both management and enforcement activities among state and federal agencies. Commission members recognize that adequate and consistent enforcement of fisheries rules is required to keep pace with increasingly complex management activity and emerging technologies. Achieving the goal will improve the effectiveness of the Commission's fishery management plans.

Annual action planning will be guided by the following objectives:

- Develop practical compliance requirements that foster stakeholder buy-in
- Evaluate the enforceability of management measures and the effectiveness of law enforcement programs
- Promote coordination and expand existing partnerships with state and federal natural resource law enforcement agencies
- Enhance stakeholder awareness of management measures through education and outreach
- Use emerging communication platforms to deliver real time information regarding regulations and the outcomes of law enforcement investigations

Goal 6 – Strengthen stakeholder and public support for the Commission

Stakeholder and public acceptance of Commission actions are critical to our ultimate success. For the Commission to be effective, these groups must have a clear understanding of our mission, vision, and decision-making processes. The goal seeks to do so through expanded outreach and education efforts about Commission programs, decision-making processes, and its management successes and challenges. It aims to engage stakeholders in the process of fisheries management and promote the activities and accomplishments of the Commission and its member states. Achieving the goal will increase stakeholder participation, understanding, and acceptance of Commission activities.

Annual action planning will be guided by the following objectives:

- Increase public understanding and support of activities through expanded outreach at the local, state, and federal levels
- Develop proactive communication to directly address issues of public concern
- Clearly define Commission processes to facilitate stakeholder participation, as well as transparency and accountability
- Strengthen national, regional, and local media relations to increase coverage of Commission actions
- Use new technologies and communication platforms to more fully engage the broader public in the Commission's activities and actions

Goal 7 – Advance Commission and member states' priorities through a proactive legislative policy agenda

Although states are positioned to achieve many of the national goals for marine fisheries through cooperative efforts, state fisheries interests are often underrepresented at the national level. This is due, in part, to the fact that policy formulation is often disconnected from the processes that provide the support, organization, and resources necessary to implement the policies. The capabilities and input of the states are an important aspect of developing national fisheries policy, and the goal seeks to increase the states' role in national policy formulation. Additionally, the goal emphasizes the importance of achieving

management goals consistent with productive commercial and recreational fisheries and healthy ecosystems.

The Commission recognizes the need to work with Congress in all phases of policy formulation. Several important fishery-related laws may be reauthorized over the next couple of years (i.e., Atlantic Coastal Act, Magnuson-Stevens Fishery Conservation and Management Act, Interjurisdictional Fisheries Act, Atlantic Striped Bass Conservation Act, and Anadromous Fish Conservation Act). The Commission needs to proactively engage with reauthorization efforts, this includes advocating for increased funding from sources such as Sportfish Restoration Trust Fund and the Atlantic Coastal Act. The Commission will be vigilant in advancing the states' interests to Congress as these laws are reauthorized and other fisheryrelated pieces of legislation are considered.

Annual action planning will be guided by the following objectives:

- Increase the Commission's profile and support in the US Congress by developing relationships between Members and their staff and Commissioners, the Executive Director, and Commission staff
- Maintain or increase long-term funding for Commission programs through the federal appropriations process and other available sources. This includes funding for non-federal surveys and to support our partnerships with outside organizations such as US Geological Survey
- Engage Congress on fishery-related legislation affecting the Atlantic coast
- Promote member states' collective interests at the regional and national levels
- Promote economic benefits of the Commission's actions (return on investment)

Goal 8 – Ensure the fiscal stability & efficient administration of the Commission

Goal 8 focuses on ensuring the business affairs of the Commission are managed effectively and efficiently, including workload balancing through the development of annual action plans to support the Commission's management coordination process. It also highlights the need for the Commission to efficiently manage its resources. The goal promotes the efficient use of legal advice to proactively review policies and react to litigation as necessary. It also promotes human resource policies that attract talented and committed individuals to conduct the work of the Commission. The goal highlights the need for the Commission as an organization to continually expand its skill set through training and educational opportunities. It calls for Commissioners and Commission staff to maintain and increase the institutional knowledge of the Commission through periods of transition. Achieving this goal will build core strengths, enabling the Commission to respond to increasingly difficult and complex fisheries management issues.

Annual action planning will be guided by the following objectives:

Conservatively manage the Commission's operations and budgets to ensure fiscal stability

- Utilize new information technology to improve meeting and workload efficiencies, and enhance communications
- Refine strategies to recruit professional staff, and enhance growth and learning opportunities for Commission and state personnel
- Fully engage new Commissioners in the Commission process and document institutional knowledge
- Utilize legal advice on new management strategies and policies, and respond to litigation as necessary