

NOAA's Office of Law Enforcement Workforce Analysis and Staffing Allocation Plan May 2012



About NOAA's Office of Law Enforcement

NOAA's Office of Law Enforcement (OLE) is a federal law enforcement agency charged with enforcing NOAA's natural resource protection laws and improving compliance with federal regulations to conserve and protect our nation's living marine resources and their natural habitat. OLE's jurisdiction spans more than three million square miles of ocean, more than 85,000 miles of U.S. Coastline, the country's thirteen National Marine Sanctuaries and its two Marine National Monuments. OLE is responsible for carrying out more than 35 federal statutes and international agreements related to living marine resources with primary mandates contained in the Magnuson-Stevens Fishery Conservation and Management Act, Marine Mammal Protection Act, Endangered Species Act, National Marine Sanctuaries Act, and the Lacey Act.

OLE provides direct support for enforcement activities in the NMFS Regional Offices, NMFS headquarters' Office of Sustainable Fisheries, and Office of Protected Resources, and the National Ocean Service's (NOS) Office of National Marine Sanctuaries. NOAA's Office of Law Enforcement further leverages the strength of collaboration through the operation of joint enforcement agreements with 27 coastal states and territories, and partnerships with other federal agencies such as the U.S. Coast Guard. OLE enforcement cases that document violations are referred to NOAA's Office of General Council, Department of Justice, or the United States Attorney's Office for review and potential prosecution under their jurisdiction.

NOAA's mandate to end overfishing could not be realized without OLE's efforts to ensure that the millions of people who enjoy these resources for recreation or rely on them for their livelihood understand and comply with the regulations necessary to ensure sustainable resources for future generations. OLE supports two objectives: (1) enforce laws and regulations that govern: commercial fisheries, international and interstate commerce in marine resources, human interactions with marine mammals and threatened and endangered species; and (2) protect resources within designated sanctuaries, marine monuments, and protected areas. To address these mission requirements OLE implements four primary methods: (1) traditional enforcement such as investigations and patrols, (2) partnerships with state and federal agencies, (3) technological tools such as Vessel Monitoring Systems, and (3) outreach and education strategies designed to enhance voluntary compliance. OLE's goal is to increase compliance with environmental laws and regulations.

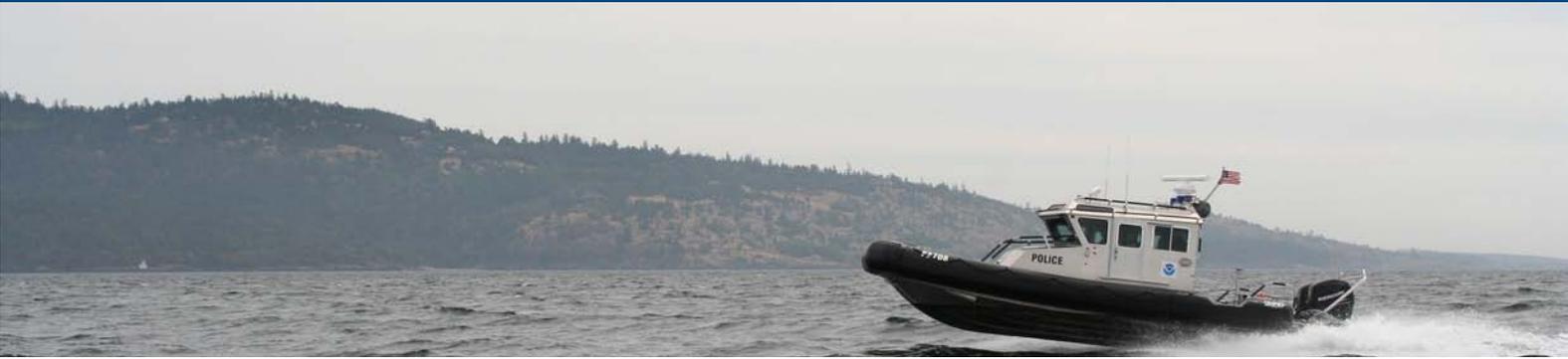


A NOAA special agent and a state partner patrol at sea. NOAA's Office of Law Enforcement operates joint enforcement agreements with 27 coastal states and territories and also partners with other federal agencies such as U.S. Coast Guard and U.S. Fish and Wildlife Service.



Table of Contents

| | |
|--|----|
| Executive Summary..... | 7 |
| Introduction..... | 9 |
| Summary of Proposed Staff Allocation for the Office of Law Enforcement..... | 10 |
| Background... .. | 10 |
| The Threat to NOAA Trust Resources..... | 11 |
| OLE’s Approach to Enforcement..... | 13 |
| OLE’s Enforcement Partners | 13 |
| Analysis of Business Drivers | 14 |
| Context for Job Classification within OLE..... | 16 |
| OLE’s Workforce Composition Compared to Similar Federal Law Enforcement Agencies | 16 |
| Analysis of the Appropriate Job Classifications within OLE..... | 19 |
| Proposed Appropriate Workforce Composition based on Mission Need | 23 |
| Headquarters and Division Summary | 24 |
| Headquarters..... | 24 |
| Northeast Division | 24 |
| Southeast Division..... | 25 |
| Southwest Division..... | 25 |
| Northwest Division..... | 26 |
| Alaska Division | 26 |
| Pacific Islands Division..... | 27 |
| Summary of Staffing Plan Details..... | 29 |
| Conclusion..... | 31 |
| Appendices/Exhibits | 33 |
| Appendix A. Analysis of OLE Position Types and Primary Job Functions | 35 |
| Appendix B. Outline of HQ & Divisional Plans | 39 |
| Appendix C. OLE Staffing and Deployment Plan | 79 |
| Table 1. National Plan..... | 79 |
| Table 2. Divisional Breakout..... | 80 |



Executive Summary

On January 21, 2010, the Department of Commerce Office of Inspector General OIG issued the report, “*Review of NOAA Fisheries Enforcement Program and Operations, Report No. OIG-19887*” in response to the Agency’s April 2009 request for a review of NOAA’s enforcement activities. In that report, OIG made five recommendations, including:

“Determine whether NOAA should continue to approach fisheries enforcement from a criminal-investigative standpoint, and if another approach is determined to be more appropriate, align OLE’s workforce composition accordingly. In particular, NOAA should determine whether the agency has an appropriate balance and alignment of uniformed enforcement officers/inspectors and criminal investigators, based on mission need.”

In response to the OIG report, NOAA took several steps to improve fisheries law enforcement activities, including a freeze on hiring new criminal investigators pending an internal workforce analysis. This document represents the results of that analysis, and provides the framework for proactively restructuring OLE’s workforce over time.

Based on an analysis of business drivers, mission needs, and related considerations, OLE is proposing significant changes in the composition of its workforce. Today, 84 percent of OLE’s workforce is special agents (series 1811), and 16 percent is enforcement officers (series 1801). For the future, OLE is proposing a workforce comprising 39 percent special agents and 61 percent enforcement officers.

In this new approach to viewing the appropriate composition of a future workforce, OLE looked beyond purely the sworn positions of the 1801, 1810, and 1811 series personnel and took a holistic approach in restructuring its workforce. A broader array of series is used, with a much improved fit to OLE’s current and evolving functions. In combination with other changes, the use of the “General Inspection, Investigation, Enforcement, and Compliance” personnel series (1801) will increase OLE’s capability to conduct monitoring, patrols, inspections, and compliance assistance activities. Similarly, while shifting from 114 special agents today to no fewer than 73 in the future, the functions performed by OLE’s special agents (series 1811) will be more focused on OLE’s critical criminal investigative work.

With this completed plan, OLE has begun moving toward the proposed composition of its future workforce. Among other uncertainties, future budgets will affect actual staffing levels and the rate at which OLE will be able to change the composition of its workforce. For this reason, the proposed future structure of OLE’s workforce represents a management objective but not a fixed or final target. NOAA Fisheries OLE will closely monitor and evaluate the implementation of this plan, and will adapt as needed to changes in national and regional priorities, internal and external capabilities, funding levels, and related factors.

Introduction

On January 21, 2010, the Department of Commerce Office of Inspector General (OIG) issued the report, *Review of NOAA Fisheries Enforcement Program and Operations, Report No. OIG-19887* in response to the Agency's April 2009 request for a review of NOAA's enforcement activities. In that report, OIG made five recommendations, including:

“Determine whether NOAA should continue to approach fisheries enforcement from a criminal-investigative standpoint, and if another approach is determined to be more appropriate, align OLE's workforce composition accordingly. In particular, NOAA should determine whether the agency has an appropriate balance and alignment of uniformed enforcement officers/inspectors and criminal investigators, based on mission need.”

In response to the OIG report, NOAA announced steps to improve fisheries law enforcement activities, which included an Agency-issued directive on February 3, 2010, that immediately froze hiring of new criminal investigators pending an internal workforce analysis. To this end, NOAA's Office of Law Enforcement (OLE) has undertaken an internal allocation planning process and is engaging in strategic planning efforts to analyze its current and future staffing needs, competencies, training requirements, as well as its mission and goals in order to help deliberately shape the office's future organization. Part of this process has included evaluating personnel structures to bolster the effectiveness of existing resources and respond to emerging needs.

OLE's workforce analysis consisted of several steps. OLE examined the role it takes in limiting/addressing threats to NOAA trust resources. OLE also conducted a comparative analysis of its approach to enforcement activities, specifically examining OLE's engagement with enforcement partners, such as the U.S. Coast Guard and state law enforcement agents. OLE determined, with the assistance of the Office of Workforce Management, its key external business drivers for the purpose of evaluating a context for job classifications within OLE. OLE also conducted a comparative review of its current and proposed workforce compositions relative to other similar federal, environmental law enforcement agencies. Taking all this information into consideration, OLE proposed the appropriate job classifications and workforce composition based on mission needs in addressing its priorities. The findings of this analysis are explained in detail within this plan.

It is important to point out that these planning efforts have not taken place in a vacuum. The proposed changes for improving upon OLE's historic structure will not be the same as they might have been if a new organization was created from scratch. For example, divisional inconsistencies in the current plan resulted from differences in regional/divisional priorities and activities, as well as the regional structures already in place. This plan provides a framework for the proposed future staffing for OLE. Implementation uncertainties such as attrition rates, more centralized and strategic staffing locations and relocation/PCS options, determining salary levels, and prioritization in effecting these changes will continue to play a role in executing the changes. In addition to these uncertainties, future budgets will significantly affect actual staffing levels and the rate at which OLE will be able to change the composition of its workforce. For this reason, the proposed future structure of OLE's workforce represents a management objective but not a fixed or final target. NMFS/OLE will closely monitor and evaluate the implementation of this plan, and will adapt as needed to changes in national and regional priorities, internal and external capabilities, funding levels, and related factors.



Lethal takes and Level “A” harassment with the potential to injure marine mammals such as humpback whales is a high priority in Alaska Division, as is any violation involving injury or potential injury to people, such as a vessel-whale collision.

Summary of Proposed Staff Allocation for the Office of Law Enforcement

As of January 2012, OLE had 114 special agents (1811), 22 enforcement officers (1801), and 29 investigative/enforcement support positions (1802 & 1805). Considering only the sworn positions, the workforce was 84 percent special agents and 16 percent enforcement officers. But OLE acknowledges that much of its recorded case work is civil in nature. Based on an analysis of business drivers, mission needs, and related considerations, OLE recommends that its personnel levels shift to an ideal of no fewer than 73 special agents (1811), along with an ideal level of 116 enforcement officers (1801) and 51 investigative/enforcement support positions (1802 & 1805). This not simply a one-for-one 1811 to 1801 shift; rather, the changes in the proposed workforce composition would result in a better alignment of position series with the mission critical functions they are charged with performing. This shift would result in a workforce comprising 39 percent special agents and 61 percent enforcement officers, placing the proposed OLE's sworn personnel structure in closer alignment to that of similar law enforcement agencies.

With responsibilities in more than 3 million square miles of open ocean, more than 85,000 miles of U.S. coastline, the Nation's 13 National Marine Sanctuaries, and its Marine National Monuments, OLE has a large mission that relies heavily on its staff (both sworn and non-sworn) in the field. The proposed personnel structure has been evaluated to bolster the effectiveness of existing resources, determine and capitalize on efficiencies, and respond to emerging needs. OLE will aggressively implement this plan over the next several years, adapting as needed to available budgets and other implementation uncertainties. NOAA leadership will re-examine and evaluate the composition and performance of OLE's workforce at least every 2 years.

Background

In its January 2010 review of NOAA fisheries enforcement programs and operations, the Department of Commerce Office of Inspector General (OIG) recommended that NOAA determine whether the Office for Law Enforcement (OLE) has an appropriate balance and alignment of uniformed enforcement officers/inspectors and criminal investigators, based on mission need.

In response to this recommendation, on February 3, 2010, the NOAA Administrator, Dr. Jane Lubchenco, ordered an immediate freeze on the hiring of criminal investigators until the National Marine Fisheries Service (NMFS) completed an internal workforce analysis to address the appropriate mix of enforcement personnel within OLE and that analysis was approved by the Administrator. In the Agency's March 18, 2010, response to the OIG, Dr. Lubchenco clarified the Agency's task by committing the Assistant Administrator for Fisheries, in consultation with the Director of the Workforce Management Office (WFMO), to the development of a phased plan (consisting of Analysis, Recommendation and Implementation) to review OLE's staffing.

This document constitutes OLE's staffing plan recommendation.

The Threat to NOAA Trust Resources

The Magnuson-Stevens Fishery Conservation and Management Act, the primary source of NOAA's enforcement workload, requires implementation of annual catch limits and corresponding accountability measures to end and prevent overfishing. As of December 31, 2011, 40 of the 46 fishery management plans had annual catch limits in place that are effective in the 2012 fishing season. In addition, 45 stocks, managed under 14 fishery management plans, are currently overfished. An additional 14 stocks, managed under six fishery management plans, are still rebuilding after being declared overfished. For many of these stocks, years of overfishing have led to their decline, and rebuilding to sustainable levels could take decades. Rebuilding plans depend on the species, and vary in length from 4 years (butterfish) to 100 years (dusky shark).

Additional threats to rebuilding stocks include a lack of robust stock assessments, which are necessary to set appropriate catch levels to reduce the likelihood of overfishing. The threat of overfishing of international stocks presents a special challenge, because the United States has no enforcement capability to ensure that non-U.S. fishing fleets do not exceed recommended catch levels.

Thus any analysis of the staffing for OLE begins with the fundamental premise that without a strong enforcement program, NOAA cannot effectively manage and protect the Nation's living marine resources, support the United States' multi-billion-dollar seafood industry, ensure vibrant marine recreational fisheries, and protect the health of seafood consumers.



OLE's Approach to Enforcement

The challenge that confronts OLE is immense. OLE is charged with enforcing 39 federal statutes over an area of responsibility that includes more than 3 million square miles of open ocean and 85,000 miles of U.S. coastline with a staff that consists of approximately 200 full-time equivalent positions.

Of the 39 federal statutes OLE enforces, five laws constitute the majority of OLE's work—

- Magnuson-Stevens Act
- Endangered Species Act
- Marine Mammal Protection Act
- National Marine Sanctuaries Act
- Lacey Act

Reviews of OLE's case management database found, for example, that 88 percent of the cases recorded in FY 2010 are associated with these five primary laws. Of these cases, the preponderance of violations investigated were civil in nature.

OLE's Enforcement Partners

To meet its enforcement obligations, OLE works closely with the U.S. Coast Guard and operates joint enforcement agreements with 27 coastal states.

The Cooperative Enforcement Program brings the resources of 27 coastal state and U.S. territorial marine conservation law enforcement agencies in direct support of the federal enforcement mission. Under the authority of joint enforcement agreements, OLE's state and territorial partners are deputized to conduct federal fisheries enforcement through near-shore, at-sea, and land-based monitoring and inspection activities. Relying on fisheries patrol activity conducted by its state and territorial partners allows OLE to concentrate a greater share of its limited resources on the investigation of more serious violations. In 2011, these partnerships contributed 157,687 workforce hours to federal marine conservation activities, more than five times what NOAA could have accomplished alone.

The Coast Guard conducts at-sea enforcement in support of national priorities to protect and conserve the Nation's living marine resources (LMR). With over 4,000 general boarding personnel and 620 fisheries boarding officer specialists, the Coast Guard concentrates its LMR enforcement activities at sea. Through at-sea sightings and boardings, Coast Guard personnel inspect fishing vessels for compliance with applicable federal LMR regulations. Coast Guard boarding teams document detected violations and forward those cases to NOAA for further investigation and prosecution. The Coast Guard also works closely with OLE by conducting joint operations and supporting NOAA fisheries enforcement operations.

In FY 2011, Coast Guard vessels and aircraft patrolled for over 106,000 hours in support of LMR enforcement missions, completing nearly 9,200 boardings and sightings during which compliance with domestic or international LMR regulations was verified. Coast Guard boarding teams and patrolling aircraft act as force multipliers to NOAA fisheries enforcement by providing targeted and incidental information on fishing vessels from boardings and sightings. This information is often the basis for further investigation by OLE.



A NOAA special agent helps collect and retrieve forensic evidence on an illegal, unregulated and unreported fishing vessel caught in Mozambique waters. IUU fishing disadvantages the U.S. high seas fishing fleet and decimates migratory stocks important to U.S. markets and the commercial industry.

Analysis of Business Drivers

In working with WFMO, it was determined that a number of external factors (business drivers) exert a significant influence on OLE's organizational structure and organization. Key external business drivers are summarized as follows:

1) Laws and regulations governing the fishing and seafood industries —

- The total set of regulations OLE enforces is massive and expanding significantly every year.
- The complexity of rules published has increased considerably over time.
- Rule complexity also affects rule enforceability, with simple rules being easier to understand and enforce than complex rules.
- While NOAA has a significant amount of control over these types of regulations, especially in the long term,
- OLE's specific ability to influence this driver is often limited to the enforcement framework established by the laws and regulations.

2) Nature of the fishing and seafood industries —

- Some fishing regulations can only be enforced through real-time observation; for example, while boats are at sea or while catch is being off-loaded or processed.
- Other regulatory requirements may be evaluated after the fact by reviewing reports and records filed with state and federal authorities, or by reviewing Vessel Monitoring System records to identify vessel movement before, during, and after fishing activities.
- For seafood imports, OLE may inspect incoming shipments of product at their point of entry, or afterward at fish distributors or dealers, to ensure the product has been properly identified and labeled. NOAA has no real ability to influence this driver.

3) Industry attitudes toward and influence upon regulation and enforcement —

- If industry participants view the regulations as excessive and unfairly applied, they may be inclined not to comply whenever they can do so without being detected.
- Participants also may seek political assistance to modify regulations or their enforcement.
- While NMFS and the Fishery Management Councils might increase their outreach efforts to better explain the necessity and value of the regulations, NOAA may have only limited ability to improve industry attitudes toward regulation and enforcement.

4) Nature of non-compliant activity —

- Some non-compliant activity is unintentional; NOAA may be able to reduce such non-compliance through increased outreach and appropriate enforcement actions.
- Non-compliant activity involving deliberate intent not to comply with regulatory requirements requires a different enforcement approach.
- In these cases, individuals may seek to conceal their illegal activity.
- Simple schemes to conceal may be easier to detect than more sophisticated schemes.
- Greater effort is required to unmask sophisticated schemes that conceal illegal activity.

5) Deterrent effects of enforcement activities —

- Considering the limited resources available to OLE to accomplish its vast enforcement responsibilities, one objective of its approach to enforcement should be the maximization of deterrent effects.

- Cases handled by civil administrative proceedings may result in substantial monetary penalties and permit sanctions.
- Although cases referred for criminal prosecution often require significant investigative resources and time, and must meet a higher standard of proof than civil proceedings, the prospect of conviction and possible incarceration creates a potentially significant deterrent to willful violations.
- Maximizing deterrence of illegal activities within limited resources is one of the strongest reasons for maintaining a complement of focused and strong criminal investigators in moving forward in OLEs strategic planning efforts.

6) Leadership and guidance provided to OLE by NMFS —

- OLE's enforcement priorities should clearly reflect the enforcement priorities of NMFS, as well as the needs of other offices to which OLE provides enforcement services.
- NMFS must oversee the process used to develop enforcement priorities and should monitor OLE activities to provide direction as required.
- NMFS and OLE have made progress in making the process for establishing OLE enforcement priorities more transparent and soliciting stakeholder input on those priorities.
- NOAA has considerable ability to influence this driver over both the short and long terms.

7) NOAA leadership's commitment to regulation and enforcement —

- NOAA senior leadership's public expressions of the importance of OLE's mission and support for that mission provide OLE personnel the confidence to continue performing their mission in the wake of external criticism.
- Leadership's public support of fisheries enforcement indicates to industry participants the importance of compliance with NOAA regulations, as well as the likelihood of enforcement action in the event of non-compliance.
- One aspect of NOAA's commitment to fisheries regulation and enforcement is expressed in the level of funding and personnel.
- While events of the past several years may have weakened trust in some areas and with some stakeholders, NOAA and OLE leadership have taken steps recently toward rebuilding trust with industry participants and other stakeholders.
- NOAA has some ability to influence this driver.

8) Priorities of federal prosecutors —

- Criminal violations investigated by OLE are referred for prosecution to the U.S. Department of Justice, and are handled either by local U.S. Attorneys' Offices or by the Environmental Crimes Section (ECS) of the Environment and Natural Resources Division.
- Some U.S. Attorney's Offices are more inclined to prosecute fisheries cases than others, while ECS generally is more open to taking NOAA cases.
- NOAA has limited ability to influence the priorities assigned by federal prosecutors to fisheries cases.

9) Willingness and ability of state law enforcement partners to engage in dockside law enforcement activities —

- State agency partners working under joint enforcement agreements exercise deputized authority on behalf of NOAA in performing dockside enforcement activities.
- If these partners are unable to fulfill joint enforcement agreement obligations, either OLE will be required to perform those activities or the activities will not be undertaken.

- NOAA's ability to influence state partners to engage in additional enforcement activities is dependent on additional stable funding for such activities.

10) High-profile events/incidents —

- High-profile events and incidents, such as a sudden spike in sea turtle deaths, may grab public attention and require an immediate response from OLE and other NOAA personnel, resulting in current work being set aside.
- Given the random and unpredictable nature of these events, NOAA has no ability to influence them.

Context for Job Classifications within OLE

The workforce composition review conducted by the OIG looked at OLE largely in terms of the appropriate ratio of 1811 series criminal investigators to 1801 series enforcement officers. In discussions with WFMO, it was recommended that OLE expand the scope of the OIG's analysis to consider a mix of not just 1811s and 1801s series, but also 1810 series general investigators. Review of case management system data, though insightful, only represented actual numbers of civil and criminal cases investigated and therefore was somewhat limited and not comprehensive.¹

Taking into account recommendations received from both the OIG report and WFMO staff—as well as the enforcement challenges and limited resources available to address those challenges previously discussed—NOAA OLE Workforce Analysis & Staffing Allocation Plan proposes to not only significantly reduce the percentage of criminal investigators (1811s) in its workforce and increase the use of civil investigators (1801s), but also proposes the addition of new performance series into its workforce in the context of non-sworn investigative and enforcement support personnel. To propose the appropriate composition of a future workforce, OLE reviewed not only its own structure but that of other federal environmental law enforcement agencies.

OLE's Workforce Composition Compared to Similar Federal Law Enforcement Agencies

In its January 2010 review of fisheries enforcement, the OIG recommended that OLE perform a comparison of its workforce to that of other federal agencies with similar mission profiles and enforcement responsibilities that also employ criminal investigators, and specifically identified the Environmental Protection Agency (EPA) and the Department of the Interior's Fish and Wildlife Service (FWS) for potential comparison.

Environmental Protection Agency (EPA)

EPA employs approximately 200 special agents (1811s) who are assigned to casework and fewer than five civil investigators (1801s) giving them a structure of less than 1 percent 1801 series civil investigators. In 2011, EPA conducted 177 civil investigations and opened 371 criminal investigations. In addition to these investigations, EPA conducted 19,000 inspections/ evaluations in 2011. The EPA inspectors who performed these inspections/ evaluations, however, are not sworn officers; rather, they are employees who have received specialized training in areas such as hazardous waste storage and handling and whose job classifications are outside the 1800 series. The role these inspectors play in EPA's enforcement regime is in some ways comparable to the roles performed by NMFS fisheries observers and by NOAA's state enforcement partners.

¹ The case data from OLE's LEADS database was used as the primary resource in determining the ratio of historic criminal cases to civil cases. The LEADS database was designed to track case information from a detection and case management function, and not necessarily to provide a review of work flow or work distribution from a personnel management perspective particularly as this relates to conducting a comparison of differing types of casework. Therefore, an analysis of LEADS data did not provide an adequate measure in determining distribution of workload for planning a long term staffing structure. Though the data is valuable and was considered for determining a baseline of OLE's historic activities, for the purposes of this staffing plan, it was not treated as a definitive representation of OLE's activities and/or future priorities.

Fish and Wildlife Service (FWS)

FWS includes two separate law enforcement organizations, the Office of Law Enforcement and the Division of Refuge Law Enforcement. The Office of Law Enforcement employs 224 special agents (1811s) and 143 wildlife inspectors (1801s). The Division of Refuge Law Enforcement employs 175 wildlife officers (1801s) and 108 park rangers (0025s). In addition, the Division includes 120 “dual function” employees (primarily wildlife refuge managers) who also have law enforcement responsibilities. Collectively, FWS has an approximate ratio of 40 percent (1811) to 60 percent (1801). In 2011, of its cases, 3,006 of FWS’s adjudicated violations were criminal and 2,601 were civil.



Analysis of the Appropriate Job Classifications within OLE

To address current and future mission goals, OLE is proposing a new approach to looking at the compositions on its workforce, which goes beyond the original 1811/1801/1810 analysis conducted by the OIG and suggested by WFMO. In determining the feasibilities for the Nationwide Personnel Allocation Plan, OLE evaluated and developed a competency model for incorporating different performance series into its workforce. In this new approach to viewing the appropriate composition of a future workforce, OLE leadership looked beyond purely the sworn positions of the 1801, 1810, and 1811 series personnel and took a holistic approach in restructuring its workforce.

Historic staffing levels resulted in personnel being held responsible for mission-critical and/or legislatively required tasks that were outside the traditional functionality of their job series. It became increasingly evident that all recommended future changes would need to consider not only the shift away from predominately 1811 series Criminal Investigators directly to 1801/1810 series civil investigators, but also in part to other non-sworn investigative support positions (e.g., 1802 and 1805 series personnel). Taking this approach allowed for better classification of necessary positions, sworn and non-sworn, based on their primary duties, functions, and responsibilities to build a workforce that is composed in a way that best meets NOAA and OLE priorities.

In conducting the analysis of the appropriate composition for OLE's workforce, OLE looked at the position types and the appropriate primary job functions currently being performed and, in some cases, suggested new position series within OLE. Appendix A, Analysis of OLE Position Types and Primary Job Functions, provides brief descriptions of the roles of each of the staff series OLE is proposing in its future workforce, and the following outlines the key considerations during development of the proposed restructuring plan.

With an increasing need to meet OLE's mission with a more balanced complement of personnel, OLE is looking to significantly reduce the number of 1811 series positions and is proposing to incorporate the use of more 1801 series uniformed Enforcement Officers, as well as 1801 series Civil Investigators with law enforcement authority, into its future staffing structure. The use of 1801 General Inspection, Investigation, Enforcement, and Compliance series personnel will increase OLE's capability to conduct monitoring, patrols, inspections, and compliance assistance activities. OLE has recently refocused its efforts on supporting and expanding its compliance assistance program work and the recommendations to increase the level of 1801s will play a vital role in this new approach. These positions will increase the visibility and interactions with the men and women in the fishing industry and coastal communities and will enhance and complement OLE's compliance assistance to those in the fishing community and others who must comply with conservation regulations. These positions will also complement the existing working relationship with uniformed state enforcement partners.

Although OLE has considered WFMO's suggestion to assess the appropriate use of 1810 General Investigation Series personnel, the feasibility of incorporating the additional and more general series into OLE's workforce was ultimately determined to be unnecessarily burdensome. As opposed to incorporating both additional 1801 and 1810 series personnel, OLE is proposing to expand the use of the 1801 series personnel to take advantage of the



A NOAA special agent (in blue cap) and a state partner check gear at the dock. NOAA's Office of Law Enforcement operates joint enforcement agreements with 27 coastal states and territories and also partners with other federal agencies such as U.S. Coast Guard and U.S. Fish and Wildlife Service.

flexibility in the primary job functions of this series. Also, OLE already has a training structure in place for 1801 series personnel at the Federal Law Enforcement Training Center (FLETC); the use of the additional 1810 series would require the creation and funding of a new training program. The use of the additional and limited series would further complicate the proposed new supervisor structure for the Enforcement Officer and Civil Investigator series.

In the holistic approach to the analysis, OLE did not simply take a one-for-one approach to the sworn personnel positions. In other words, the reduction in the 1811 series positions did not automatically translate into a new 1801 position; rather, the necessary functionality of the position and the forecasted workload were used to determine the appropriate series needed. OLE continues to struggle to keep up with the ever-increasing data requirements, recordkeeping, reporting requirements, and data input. Numerous efforts such as case documentation data entry, administrative recordkeeping, copying, scanning, and filing all reduce the time that agents and officers can spend in their primary roles.

The majority of this work could and should be accomplished by investigative support positions such as enforcement technicians, investigative analysts, and other administrative support positions. Additionally, the proposed increase of officers will also lead to an increased need for documentation support. All patrols (air, sea, and land), vessel boardings, and dealer inspections conducted by officers will need to be adequately documented. These documentation efforts will not only create a valuable investigative database of contacts, but also creates valuable agency statistics. To promote effective and efficient recordkeeping, OLE is proposing personnel changes that better use the existing personnel trained in the necessary analytical and recordkeeping technology. OLE also is proposing to increase the number of these positions by changing billets from sworn to non-sworn personnel and garnering the recommended additional investigative and administrative support positions.

Proposed Appropriate Workforce Composition Based on Mission Need

OLE leadership integrated its priority-setting efforts into the analysis of the appropriate composition of its future workforce. In response to an OIG recommendation in the January 2010 report, OLE has undergone a detailed and collaborative process to identify its national and divisional enforcement priorities for FY 2012. Creating these priorities collaboratively was a new and iterative process for the office, which has carried over into the discussions of resource planning in the context of the office's personnel plans to help ensure appropriate staffing levels are determined to effectively and efficiently address these new priorities.

In the final draft, OLE has established its national priorities for FY 2012 to focus on actions that support sustainable fisheries and safe seafood, and that support recovered and healthy marine and coastal species and healthy habitats. In support of these national priorities, and to benefit NOAA's resource-based mission goals, OLE's enforcement programs will also support two national priorities that cut across all regions and programs:

- Compliance assistance—As the commercial and recreational fishing industries have developed, and as fishery managers have worked to afford them the maximum opportunities, regulations have become more complicated. As a result, more effort is required to help the fishing industry understand and follow regulations that support the long-term sustainability of marine resources and the economic activity those resources support.
- Observers—Observer programs provide critical scientific data on fish stock status, bycatch, and fish harvest interactions with protected species. Observer programs require enforcement support to maintain safe work environments that support accurate and objective data collection and reporting.

In addition to the national FY 2012 priorities, OLE also set regional priorities for FY 2012 that would more specifically support sustainable fisheries and safe seafood, and support recovered and healthy marine and coastal species and healthy habitats at the regional level. The Regional FY 2012 Priorities for Supporting Sustainable Fisheries and Safe Seafood include:

- Focus resources on overfished stocks and stocks experiencing overfishing.
- Expand contact with the regulated communities including compliance support, monitoring, and inspections of regulated activity to identify problems, deter violations, and detect violations requiring enforcement action.
- Focus enforcement services to support commercial and recreational catch reporting in support of annual catch limit monitoring.

And the Regional FY 2012 Priorities for Supporting Recovered and Healthy Marine and Coastal Species and Healthy Habitats include:

- Expand compliance assistance, monitoring, and enforcement actions to improve compliance with regulations to protect endangered species.



NOAA special agents conduct an investigation under the Marine Mammal Protection Act.

- Expand enforcement services provided to support National Marine Sanctuaries.
- Expand compliance assistance to the whale watching/marine mammal viewing industry to reduce illegal vessel/person/marine mammal interactions.

These regional priorities are directly supported by Divisional Priorities called out in greater detail in *NOAA's Office of Law Enforcement National and Division Enforcement Priorities for 2012* (http://www.nmfs.noaa.gov/ole/enforcement_priorities.html). The Division priorities support each of the regional priorities (and thus support the national priorities) by providing specificity for geographic areas considering specific resources, activities, and threats of the specific Division. In direct support of all tiered priorities, OLE manages on-the-ground operations in such a manner as to both ensure consistent efforts across the country but also maintain the flexibility in the roles of personnel to execute area-specific operations. For instance, East Coast ports land a significant number of international catches and divisional priority in the Northeast and Southeast, and thus for example the focus of 1811 series personnel, tend to be driven heavily by efforts to reduce IUU and seafood fraud activities, which might not be identical in focus to similar personnel in other Divisions. In activity areas such as this, where divisional efforts may differ slightly, the difference in the divisional structures highlight the operational specificity and forecasted staffing needs necessary to meeting mission-requirements around the country. The detailed list of these more specific priorities available in the Priorities document provide the direction for compliance and enforcement activities; and are discussed in context to divisional staffing requirements below.

HEADQUARTERS AND DIVISION SUMMARIES

Headquarters

OLE's Headquarters (HQ) office provides management, oversight and support to OLE's nationwide programs, and ensures consistent execution of key operational matters. HQ includes the Policy and Inspections Program; Public Affairs and Outreach Program; Enforcement Programs including both the National and International Programs, the Cooperative Enforcement Program, and the National Training Program (located in Glynco, GA); as well as Support Services including Budget & Planning, Workforce & Administrative Program, Information Technology/National VMS Program, and Law Enforcement Accessible Database (LEADS). Centralizing the functions of training, communications, international issues, and IT, as well as maintaining budgetary and administrative oversight, allows for efficiencies and consistencies across the office. Additionally, HQ programs will provide the necessary oversight and senior-level support to ensure that regional operations collectively work on the daily on-the-ground requirements necessary to meet the national priorities of compliance assistance and observer support.

Northeast Division

With 10 State Joint Enforcement Agreement (JEA) partners, two U.S. Coast Guard Districts, and two fishery management councils in its area of responsibility, it is essential that the Northeast Division maintain a presence throughout its area of responsibility. Enforcement officers and Civil Investigators (both 1801 series) would be located in each of nine offices throughout the Division to deal with the majority of civil enforcement and investigation priorities. The focus of the 1801 series would be to meet regional/divisional priorities in fisheries, endangered species, and marine mammal investigations through compliance assistance and observer program support efforts. Patrol efforts by these staff would serve to address priority efforts regarding overfished fish stocks and catch reporting.

The 1811 series criminal investigators would be assigned to address complex criminal violations such as fraud, submission of false documents, conspiracy, and Lacey Act violations (interstate and international) that include seafood fraud. These activities provide direct support for regional/divisional priorities to provide safe seafood for consumers, deter efforts to conceal catch information for financial gain, and ensure observer safety. The majority of 1811 investigators would be located in one of two hubs. The Braintree, MA, office would cover Massachusetts north, and the Wall, NJ, hub would cover Rhode Island and New York through Maryland. Additional 1811 investigators would be located in Newport News, VA, where a majority of criminal Interstate Lacey Act cases occur. The enforcement support staff, including investigative analysts/auditors and enforcement technicians, would be assigned to key offices to support the regional/divisional priorities and case load.

Southeast Division

The Southeast Division's priorities are diverse: from monitoring thousands of small and remote offloading ports for Catch Share Programs and other high-priority species; to patrolling vast areas for at-sea endangered species/Turtle Excluder Device (TED) and fisheries compliance and marine protected areas; to monitoring exported and imported seafood at the borders and ports. Uniformed enforcement officers would be assigned to every office in the Division to develop compliance assistance efforts and promote Joint Enforcement Agreement liaison work, which support the sustainable fisheries, marine species, and habitat priorities. They will conduct patrol efforts for civil Magnuson fisheries, endangered species, and marine mammal issues to address those same priorities as well as compliance assistance priorities. TED compliance is one of the top priorities in the Southeast for protection of marine turtle species, which requires continued community outreach and monitoring. The majority of the work for TED compliance would occur in Texas and Louisiana where the vast majority of strandings have been documented. Enforcement officers in Galveston, TX, and Slidell, LA, would do the bulk of the TED work, with Niceville, FL, St. Petersburg, FL, and Key West, FL, also participating. Charleston, SC, and Jacksonville, FL, would be the focal points for TED enforcement along the East Coast. In addition, the larger Catch Share Program landing sites requiring monitoring occur in the eastern Gulf of Mexico along the Florida coast.

The 1811 series investigators would be assigned to offices at or near major customs ports to handle Illegal, Unreported and Unregulated (IUU) fishing and seafood fraud investigations as well as interstate Lacey Act cases involving egregious violations. These efforts directly support the regional/divisional sustainable fisheries and seafood safety priorities. These offices would be in Galveston, TX, Slidell, LA, Mobile, AL, Miami, FL, and Jacksonville, FL. 1801 series Civil Investigators would be located throughout the Division to enhance the investigative program by handling more complex and time-consuming living marine resource civil cases. Civil Investigators would be located in Harlingen, TX, St. Petersburg, FL, Marathon, FL, Charleston, SC, Morehead City, NC, and San Juan, PR.

Southwest Division

The future deployment of personnel is focused on providing sufficient services in California, Nevada, and Arizona based on regional/divisional priorities. Priorities involving Magnuson Act fisheries, such as catch shares and highly migratory species regulations, would be handled by uniformed enforcement officers located in each of the seven Division offices. To accomplish their responsibilities they would coordinate with JEA partners and the U.S. Coast Guard to schedule surface and aerial assets for patrol efforts in compliance monitoring and assistance. The enforcement officers would also be assigned to enforcement responsibilities for four sanctuaries: Monterey Bay, Gulf of the Farallones, Cordell Bank, and Channel Islands. In addition, the Division has international responsibilities in a joint effort to combat and address IUU activities and control import issues, which is accomplished through inspecting and monitoring seafood imports through three major seaports

(Los Angeles, Long Beach, and San Francisco) and the U.S.-Mexico border. Lastly, the Southwest Region is responsible for running the national dolphin-safe program, where agents conduct investigations involving dealers and processors suspected of importing embargoed frozen and processed tuna products nationwide claimed to be “dolphin-safe.” Depending on the nature of the violation, this would be handled by either an 1801 enforcement officer, 1801 civil investigator, or 1811 investigator with support from an investigative analyst.

Smuggling cases involving fish and wildlife being imported by way of air/seaports and then trucked from Mexico into the California and Arizona ports of entry involve criminal statutes and would be investigated by 1811 investigators. They would also support the Observer Program in instances involving personal safety of the observers. The 1811 investigators would be located in Santa Rosa, Long Beach, and San Diego to address these priorities.

Northwest Division

The Northwest Division currently uses 1801 series uniformed enforcement officers to perform actions to meet high priorities associated with sustainable fisheries and marine mammal protection through patrols, inspections, compliance assistance, outreach, and civil investigations. Because enforcement officers will directly support the West Coast catch shares program, they will be placed first in Astoria and Newport—the ports with the highest landings and largest fleets and processing plants. After adequately staffing the coastal ports, the Northwest Division will add officers to Portland and Seattle to assist with critical monitoring and inspection functions related to international imports/exports, tracking IUU products, handling Lacey Act marking violations, and pursuing complex civil investigations. Other Northwest Division priorities—such as compliance assistance, documenting recordkeeping and reporting, declaration and closed area/VMS violations, data entry and analysis, and identifying crime trends—will be transferred from investigators to enhanced enforcement technicians and investigative analysts.

NOAA’s criminal investigative expertise continues to be in demand from Oregon and Washington state enforcement partners, the U.S. Coast Guard, U.S. Attorney’s Offices, and the Pacific Fishery Management Council. To meet these needs, the Northwest Division plans to centralize 1801 investigators in Seattle and Portland to co-locate or closely locate with the key partners. They will also be located in the primary international ports of entry and export, which also will allow immediate response to high priorities relating to international, IUU, and Lacey Act responsibilities.

Alaska Division

The Alaska Division will use uniformed enforcement officers, special agents, and investigative assistants and analysts to meet its enforcement priorities. The 1801 series enforcement officers will be located in field offices that align with ports receiving the highest volumes of federally managed fish in support of the sustainable fisheries priority. They will provide patrol services on the docks, at sea, and via aircraft; provide outreach to the industry and public; and focus on less egregious civil violations through education, verbal and written warnings, or summary settlements.

The 1811 investigators will be centralized in Juneau and Anchorage. Locating them in each major transportation hub will allow for quick deployment to port communities and ensure availability to conduct warrant service, undercover investigations, and surveillance in support of complex criminal investigations involving significant and deliberate sustainable fisheries violations. They will also support the highest regional/divisional enforcement priorities, such as observer harassment and assault, seafood fraud, and international violations. Investigative

assistants for each of the Enforcement Officer Patrol groups and Investigative Units will provide critical support such as case data entries and organizing and analyzing records and evidence for court. An investigative analyst will be located in the Alaska Regional Office to review and analyze case-specific fishery and other data to detect violations, identify trends, and analyze workload issues that can be used to plan and focus enforcement efforts.

Pacific Islands Division

The Pacific Islands Division is the largest geographical Division in OLE. It is the main platform from which OLE provides enforcement and compliance services to the main Hawaiian Islands, the Western and Central Pacific, and Asia. The Division manages four Joint Enforcement Agreements and oversees four National Monuments and two Sanctuaries, resulting in many protected resource initiatives and enforcement challenges regarding fish, marine mammals, endangered species, and distances/time zones. With foreign fishing and their support vessels allowed to land product in all Pacific Islands Division ports except Hawaii, this Division is on the frontlines of international marine enforcement issues and IUU fishing in the Pacific. The Pacific Islands Division is responsible for enforcement issues related to NOAA's commitments to a number of treaties and conventions, such as the Western and Central Pacific Fisheries Commission, the South Pacific Tuna Treaty, and pending Port State Measures. OLE personnel must be able to address not only the simple infractions and civil violations detected via patrol and/or complaints, but also the complex civil and criminal investigations that are multiagency, multijurisdictional, and often have a transnational nexus. Under these international obligations as well as others like the USAID's Coral Triangle Initiative, Pacific Islands Division also is called upon to evaluate neighboring Pacific Island nations' fishery enforcement programs and to train their personnel on fishery enforcement procedures. To meet the criminal investigative priorities in the Division (Sustainable fisheries through enforcement of international agreements with criminal sanctions), 1811 investigators would be located in Guam, Honiara, American Samoa, and Honolulu, with the majority being in Hawaii. Enforcement officers would handle civil matters associated with priorities involving sanctuaries, sustainable fisheries, and protection of marine species. They would be stationed in the same duty stations (except Honiara, where violations are historically criminal in nature). As with the 1811 investigators, the majority of the enforcement officers would be in Hawaii.



Summary of Staffing Plan Details: The First Implementation Steps Toward a New OLE

Applying the new approach to the composition of the OLE workforce, discussed in the *Analysis of the Appropriate Job Classifications within OLE* section, resulted in a new look for OLE in the future. This new approach considers the need to address both NOAA's and OLE's missions, goals, and priorities. The staffing plan sets a clear target for the future, provides an initial annual implementation strategy, and allows for reassessment and realignment as necessary. Some notable changes include

- Decrease in 1811 series (Special Agents) to no fewer than 73, and increase in 1801 series (Enforcement Officers).
- Increase in enforcement support series to build a solid infrastructure. This includes incorporating the 1805 series Investigative Analysts and 1802 series Technicians.
- Transition of a supervisory Deputy Special Agent in Charge (DSAC) position (1811 series) in each region with a supervisory Administrative Officer.



NOAA special agents talk with members of the community along the waterfront in Gloucester, Mass. Compliance assistance and outreach is a supporting priority that cuts across all six Enforcement divisions.

The remainder of FY 2012 and FY 2013 represent the first step in moving toward the proposed future plan within the budget and position constraints of FY 2012 – 2013. OLE has prioritized the current personnel needs within this framework based on the aforementioned enforcement priorities, requirements to accomplish the mission, and immediate infrastructure needs. The FY 2013 numbers represent the expected onboard personnel at the end of the fiscal year with attrition consideration being limited to known mandatory retirements.

FY 2013 Implementation Priorities include:

- Vacant frontline supervisor positions in specific Divisions will be filled. This is expected to have a sum zero result with regard to 1811s.
- One Deputy Special Agent in Charge (DSAC) in each Division will be replaced with an Administrative Officer. This will align the Division organizational structure with the new HQ structure. (Converts 4 DSAC 1811s to 4 non-sworn positions.)
- Deputy Director – currently an Acting status will be filled.
- Approximately 7 vacant support staff positions to be filled.

The tables below provide a snapshot of OLE positions past, current, near future, and long term recommendations:

| Total Personnel | Total | Total 1811 | Total 1801 | Total Invest/Enf. Support | Total Admin. Support |
|------------------------|--------------|-------------------|-------------------|----------------------------------|-----------------------------|
| 2010 | 234 | 147 | 18 | 20 | 49 |
| 2012 | 212 | 114 | 22 | 29 | 47 |
| Proposed 2013 | 231 | 110 | 36 | 33 | 52 |
| Proposed Future | 308 | 73 | 116 | 51 | 68 |

| Total Personnel | | Ratio 1811s to 1801s to Invest/Enf. Support | | |
|------------------------|-----|--|--------|--------|
| 2010 | 185 | 79.46% | 9.73% | 10.81% |
| 2012 | 165 | 69.09% | 13.33% | 17.58% |
| Proposed 2013 | 179 | 61.45% | 20.11% | 18.44% |
| Proposed Future | 240 | 30.42% | 48.33% | 21.25% |

| Total Personnel | | Ratio 1811s to 1801s to Invest/Enf. to Admin. | | | |
|------------------------|-----|--|--------|--------|--------|
| 2010 | 234 | 62.82% | 7.69% | 8.55% | 20.94% |
| 2012 | 212 | 53.77% | 10.38% | 13.68% | 22.17% |
| Proposed 2013 | 231 | 47.62% | 15.58% | 14.29% | 22.51% |
| Proposed Future | 308 | 23.70% | 37.66% | 16.56% | 22.08% |

| Total Personnel | | Ratio 1811s to 1801s | |
|------------------------|-----|-----------------------------|--------|
| 2010 | 165 | 89.09% | 10.91% |
| 2012 | 136 | 83.82% | 16.18% |
| Proposed 2013 | 146 | 75.34% | 24.66% |
| Proposed Future | 189 | 38.62% | 61.38% |

The details of each Division proposed future and FY 2013 staffing plan details by OPM position series is contained in Appendix C.



Conclusion

As part of the commitment in the March 2010 Corrective Action Plan, NOAA/OLE has committed to “the development of a plan to review OLE staffing and procedures, which included engagement with a third party reviewer” as well as “strategies for adoption and validation [of the plan] by a credible external group.” At this time OLE has engaged Workforce Management, as well as NMFS and NOAA leadership, in reviewing and critiquing pieces of the proposed draft OLE Allocation Plan. An external review and outreach plan has been developed to discuss NOAA’s approach with key external partners included but not limited to the USCG, FWS, DOJ, the U.S. Attorney’s Office and state partners. Collectively, these engagements will satisfy OLE’s commitment to external review.

It is also important to note that this plan provides a general outline of the proposed future staffing levels for OLE. Achieving target levels for personnel allocation will proceed subject to transitional implementation requirements for these staffing changes. Implementation challenges—such as attrition implications, budget limitations, more centralized and strategic staffing locations and relocation/PCS options, determining salary levels, and prioritization in effecting these changes—will be further addressed in subsequent planning efforts.

These proposed changes represent a significant transformation in OLE’s workforce structure, and will take time to implement. The proposed composition as well as numbers and locations of positions will need to be reassessed regularly as national and regional priorities, internal and external capabilities, funding levels, and related factors evolve. The proposed future staffing levels are not necessarily a fixed or final target; rather, they represent a requirements-based assessment of current and evolving needs. NMFS/OLE will need to adjust the proposed levels of staff support and the speed of its progress toward OLE’s future workforce composition as needed to adapt to future funding levels and related implementation factors. The future staffing composition proposed in this plan represents a management objective that will be aggressively implemented and continually re-assessed as OLE’s needs, capabilities, and performance evolve.



Appendices/Exhibits

Appendix A. Analysis of OLE Position Types and Primary Job Functions

Appendix B. Outline of HQ & Divisional Plans

Appendix C. OLE Staffing and Deployment Plan

Table 1. National Plan illustrates the proposed restructuring combined across all OLE staff positions by OPM series type.

Table 2. Divisional Breakout details the proposed restructuring for each Division and Headquarters separated out by OLE working titles for positions within each OPM series.



Appendix A. Analysis of OLE Position Types and Primary Job Functions

In conducting the analysis of the appropriate composition for OLE's workforce, OLE looked at the position types and the appropriate primary job functions currently being performed and in some cases are being suggested as new positions within OLE. The following provides a brief description of the roles of each of the staff series that OLE is proposing in its future workforce.

1801 Series – Supervisory Enforcement Officers

OLE's Director of Enforcement is delegated full responsibility and authority for supervising and managing the Agency's law enforcement function, and is responsible for developing programs, policies and guidelines for law enforcement activities with respect to international obligations and domestic fisheries laws and regulations. The Director coordinates with appropriate state and federal programs to facilitate attainment of broad management objectives; recommends budgets, reports on status of programs and coordinates with domestic and international activities relating to marine resource conservation and protection. The Director also manages the Policy and Inspections Program and the Public Affairs and Outreach staff.

The use of 1801 series supervisory Enforcement Officers is being proposed as part of the future staffing structure in the Divisions. The EO Supervisors would supervise those Enforcement Officers in their area of responsibility and be responsible for the management of all patrol, inspection and compliance liaison activities.

1801 Series - Enforcement Officers and Civil Investigators

When deployed in a Division, Enforcement Officers are primarily responsible for patrolling, boarding and inspecting the commercial and recreational fishing industry for compliance with all laws and regulations under NOAA's jurisdiction. Enforcement Officers are the uniformed presence of OLE and the suggested use of Civil Investigators would be either uniformed inspectors or plain clothed investigators as appropriate. Staff in this series work in concert with state and USCG partners to provide the most effective enforcement and compliance efforts as possible; and conduct education, outreach and compliance assistance to ensure effective interaction with industry and the general public.

1811 Series - Supervisory Special Agents

The OLE Deputy Director of Enforcement manages the Assistant Director for Enforcement Programs Division, the Assistant Director for Support Services and the Field Division Special Agents in Charge (SACs) and oversees office operations to include issues that cross multiple divisions. The Deputy Director acts as OLE's Pay Pool Manager for the Commerce Alternative Personnel System and serves as Acting Director in the absence of the Director.

The Assistant Director for Enforcement Programs provides management and supervision of the Enforcement Program Division which includes International Programs, National Programs and the National Training Program. Additionally, the Assistant Director directly responsible for coordination of OLE's international enforcement efforts including but not limited to coordinating OLE engagement on legislative and regulatory actions with an international nexus, participation at Regional Fishery Management Organizations (RFMOs), representation at the International Monitoring, Control and Surveillance Network, and participation on US delegations for fisheries enforcement related international negotiations.

The Assistant Special Agent in Charge (ASAC) - National Training Coordinator administers the agency's primary training function with responsibility for planning and developing training programs and serving as an advocate for the Agency's needs to the leadership team at the Federal Law Enforcement Training Center (FLETC) in Glynco, Georgia.

Each field Division has a single Special Agent in Charge (SAC) who reports to the Deputy Director and is ultimately responsible for all law enforcement activities and administrative functions across the Division. The SAC manages the overall Division's enforcement program, supervises the Deputy Special Agents in Charge (DSACs), and oversees administrative programs and staff.

The DSACs supervise the Assistant Special Agents in Charge (ASACs) and oversee all enforcement cases, investigations and operations and have the training and experience to participate in the field on large and/or sensitive operations. Additionally, DSACs manage administrative programs and functions, as well as may supervise administrative staff.

The ASACs supervise the 1811 series Special Agents, direct all investigations and related operations, as well as supervise some administrative support positions.

1811 Series - Special Agents

OLE Special Agents are primarily responsible for conducting criminal and civil investigations by documenting violations of laws and regulations within NOAA's jurisdiction, or other federal or state violations related to NOAA's mission. Another major component of work includes establishing and maintaining effective working relationships within OLE and with other law enforcement agencies and ensuring effective interaction with the public (education, outreach and compliance assistance). Although traditionally not written into performance plans, Special Agents historically have performed monitoring, patrolling and inspection functions due to the flexibility offered in this series position and due to a shortage of federal uniformed Enforcement Officers within the Divisions.

1802 Series - Compliance Inspection and Support

The 1802 series is currently broken into three main categories in OLE, the Enforcement Technician positions and VMS Technician Positions, and JEA Technician/Program Coordinator.

Enforcement Technicians are primarily responsible for processing investigative case packages and data entry into OLE's web based records management system (LEADS). Enforcement Technicians provide operational support to the field by acting as assistant evidence custodians, processing funds into the lockbox, preparing case packages and performing NCIC checks (and accessing other databases in support of case packages). Some also perform a variety of administrative tasks such as preparing travel vouchers and entering into travel manager; collecting purchase card information; collecting and maintaining government vehicle registration information; and other administrative duties for their Districts.

VMS Technicians are primarily responsible for monitoring fishing and other vessel activity within the Vessel Monitoring Systems (VMS). These Technicians also provide significant customer service to industry members who are required to operate and maintain VMS units. This includes troubleshooting, trip coding error corrections, days-at-sea tracking and modifications, etc. Technicians identify possible closed area incursions, declaration violations and other possible violations of VMS.

The JEA Program Coordinator is responsible for ensuring the Joint Enforcement Agreement (JEA) partners are following the guidelines of their respective cooperative agreements and spending plans based on the funding they receive. The Coordinator conducts meetings and tracks productivity through assessments and reporting throughout the contract year.

1805 Series - Investigative Analysts

The 1805 series Investigative Analysts is a proposed new series for OLE. These positions would provide a formal analytical capability to track and analyze the harvest and trade of fishery and other regulated marine products under NOAA's jurisdiction. This analytical capability would need to include, but is not necessarily limited to, the ability to analyze business operations, track ownership of vessels and business entities; research various databases and information systems, analyze and evaluate the data and information; develop suspect-violation correlations and profiles; and provide violation forecasting. The focus of this work would be to identify incidents, patterns or trends which violate federal civil and criminal laws and refer that information for consideration of investigation by sworn staff.

0301 Series - Compliance Liaisons

The 0301 series compliance liaison provides guidance in the interpretation and application of Federal laws such as MSFCMA, ESA, MMPA and other fishery regulations; serves as the agency representative to improve communication and education with the regulated fishing industry and general public; provides advice and assistance to stakeholders regarding regulations and interpretation of applicable complex laws, regulations and policies that govern commercial fishing; provides briefings and compliance improvement materials to the industry; and provides feedback from industry to federal regulators and senior management. This position was established as part of a pilot program in New England.

0341 Series Supervisors

The Assistant Director of Support Services (0341 Supervisor) manages the planning and research activities for the office including, but not limited to, strategic planning, formulation of goals and objectives, preparation of statistical and annual reports, and resource allocations. The Division includes: Budget and Planning; Workforce & Administrative Programs; LEADS and Information Technology/National VMS Program.

The proposed use of the 0341 series Administrative Officers in the Divisions would provide supervision and management of all administrative functions including budget, procurement and acquisitions, human resources coordination, property, facilities, records, contracts, and auditing functions. This position would supervise and would be supported by the 0342 series Support Services Specialists and similar administrative positions. This series is currently in use in HQ with similar function

0342, 0343, 0303, 0318, and 0326 Series – Various Administrative Series

The 0342 series Support Services Specialists provide administrative support services such as answering phones, preparing and entering travel documents, entering time and attendance, entering biweekly data, collecting and sorting mail, filing, copying, maintaining records systems, assisting with property, vehicle, and facilities management, and assisting other administrative personnel with tasks as needed. Personnel hired under this series do not require any law enforcement or fisheries-specific experience or knowledge to perform their duties successfully.

The 0343 series Program Managers/Analysts are employed in a range of position titles within OLE but primary responsibilities across positions include providing supervision or team lead responsibilities, oversight and management to their program; ensuring effective implementation and execution of national, regional and divisional procedures and policies; providing direction and leadership in their program areas to effectively and efficiently achieve the goals and objectives of their program area; and establishing good communications with user groups to determine effectiveness and review procedures to evaluate the efficiency of the program.

The 0318 series Secretaries are responsible for ensuring efficient administrative by serving as the travel specialist, timekeeper, and pay specialist; as well as providing procurement assistance.

Currently the 0303 series Administrative Support Assistant serves as the backup to the secretary and is a category not recommended for future restructuring.

The 0326 series Administrative Assistants ensure efficient administrative operations by providing phone reception duties, greeting visitors, scheduling meetings and processing mailings; maintaining vehicle and other property inventory; assisting employees with general administrative duties and coordinating all Division travel; entering and maintaining time and attendance records through WebTA; and handling routine procurement and purchase requests.

2210 Series - Information Technology Specialists

The 2210 series IT Specialists support the office's IT needs to ensure consistent access, connectivity and data flow; monitor and manage network information and access to required data, maintain a healthy IT system including laptops, printers, cellular phones, etc.; provide lifecycle management guidance by developing, testing, implementing and supporting IT systems; track and inventory IT equipment and property; implement training programs to enhance user understanding and proficiency of applications and equipment; and participate in National IT calls as the IT representative for their respective Division.

0511 Series - Auditors

The new specialized positions of 0511 series Auditors would address significant reporting requirements that are necessary to identify problem areas, and would provide audit support to investigators conducting both civil and criminal investigations.

Appendix B. OLE Staffing and Deployment Plan

OLE Headquarters

NOAA's Office of Law Enforcement (OLE) Headquarters (HQ) office located in Silver Spring, Maryland provides management, oversight, and support to OLE's nationwide programs. The Headquarters office includes the Policy and Inspections Program; Public Affairs and Outreach Program; Enforcement Programs including both the National and International Programs, the Cooperative Enforcement Program, and the National Training Program (located in Glynco, GA); as well as Support Services including Budget & Planning, Workforce & Administrative Program, Information Technology/National VMS Program, and Law Enforcement Accessible Database(LEADS).

Staffing Comparison Summary

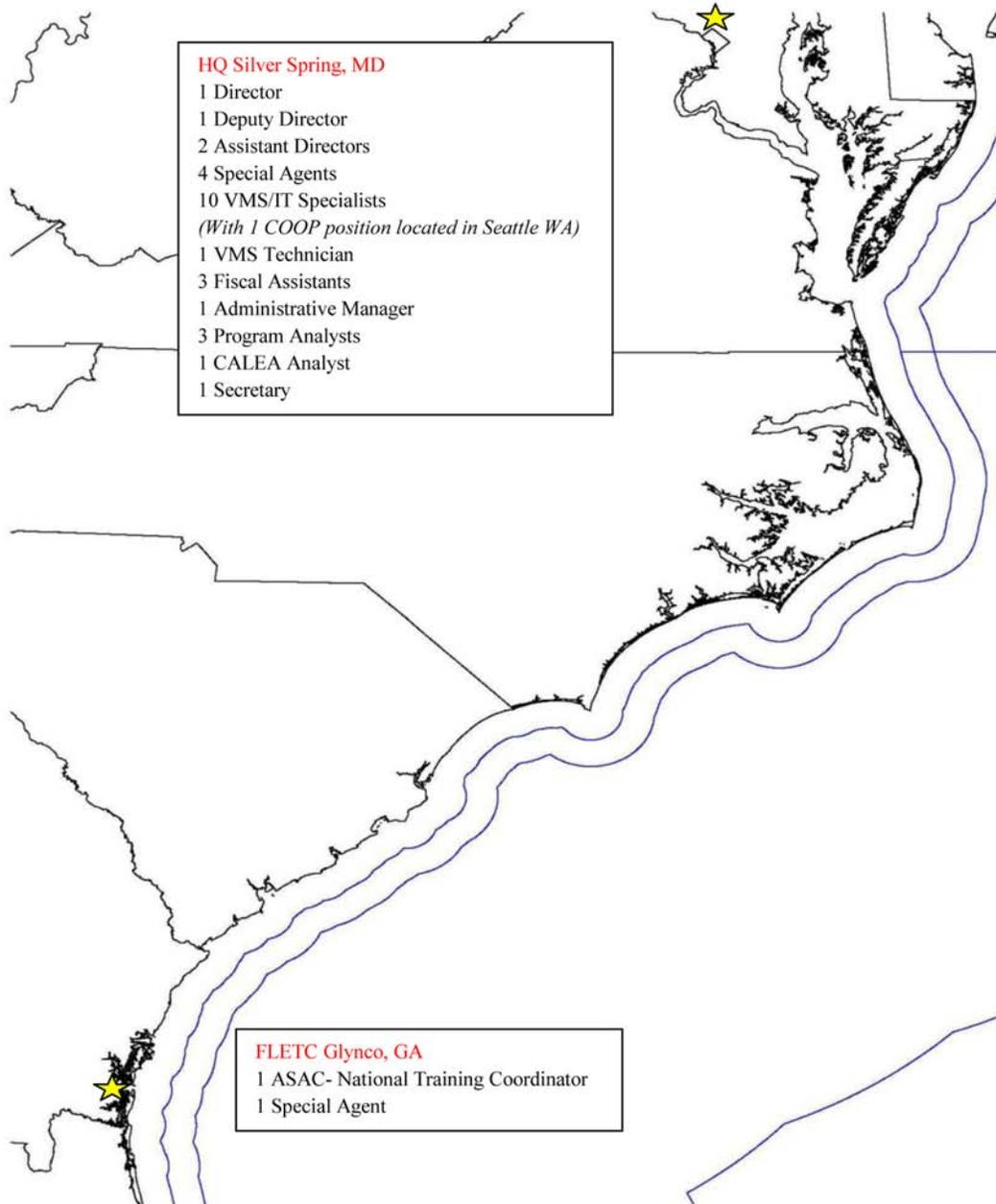
Selected Baseline Staffing Levels

In February 2010, OLE HQ was comprised of thirty (30) full time employees (FTE) positions that were broken out as follows:

- Supervisory, six (6)
 - One (1) Director (1811 series)
 - One (1) Deputy Director (1811 series)
 - Two (2) Assistant Directors (1811 series)
 - One (1) ASACs (1811 series)
 - One (1) Administrative Manager
- Non-Supervisory, twenty four (24)
 - Five (5) Special Agents
 - Ten (10) VMS/IT Specialists
 - One (1) VMS Technician
 - Three (3) Fiscal Assistants
 - Three (3) Program Analysts
 - One (1) CALEA Analyst
 - One (1) Secretary

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Civil Invest. | Admin. | Total |
|------------------------------|--------------------|------------------------|---------------|----------------------|---------------|--------------|
| NOAA HQ Silver Spring, MD | 4 | 0 | 4 | 0 | 19 | 27 |
| FLETC Glynco, GA | 1 | 0 | 1 | 0 | 0 | 2 |
| VMS/IT COOP Seattle, WA | 0 | 0 | 0 | 0 | 1 | 1 |
| 2010 Totals | 5 | 0 | 5 | 0 | 20 | 30 |

HQ 2010 STAFFING



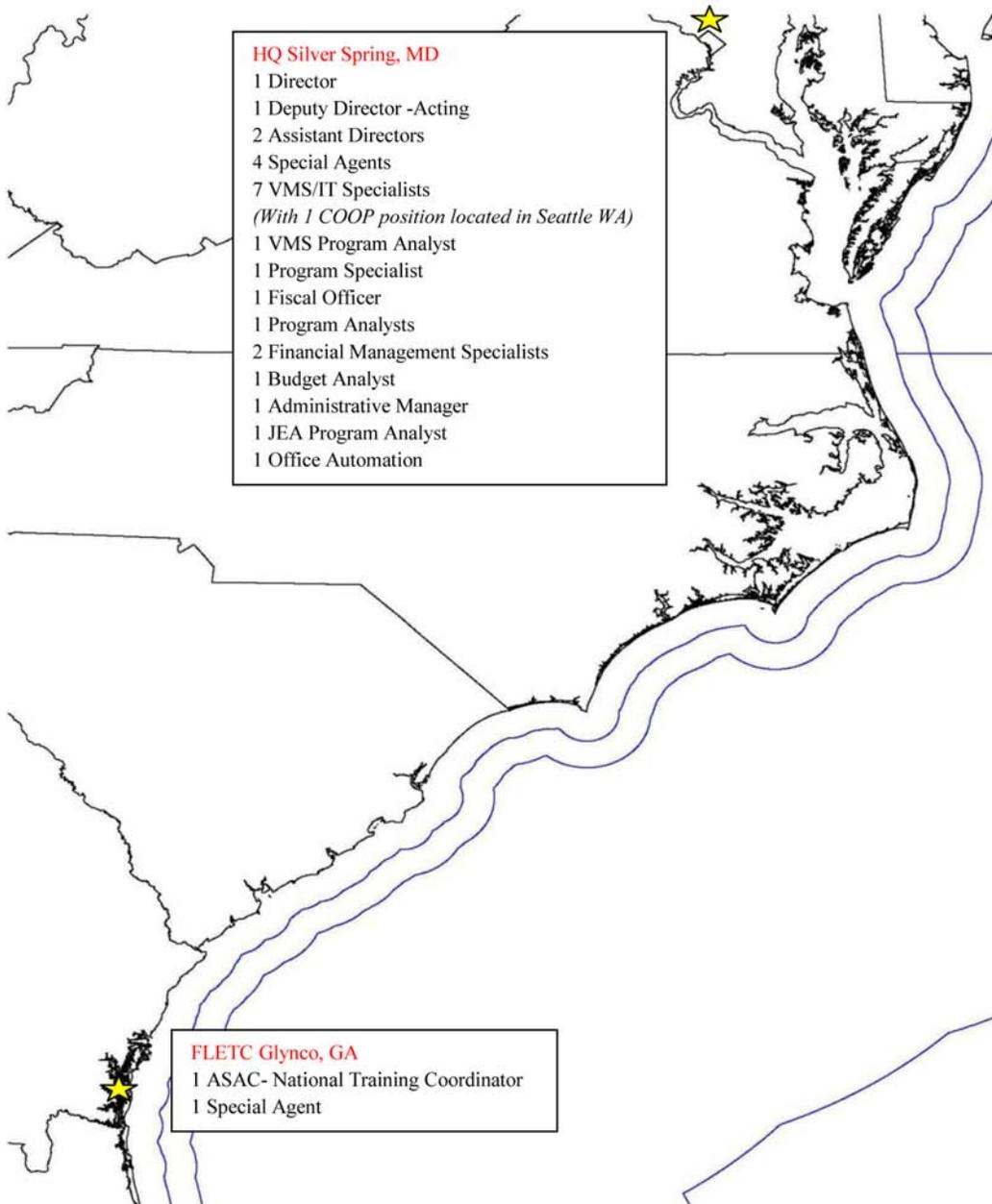
Current Staffing Level

As of January 2012, HQ is comprised of twenty seven (27) FTE positions broken out as follows:

- Supervisory, seven (7)
 - One (1) Director (1801 series)
 - One (1) Deputy Director - Acting (1811 series)
 - Two (2) Assistant Directors(1811 and 0341 series)
 - One (1) ASACs (1811 series)
 - One (1) Administrative Manager
 - One (1) Fiscal Officer
- Non-Supervisory, twenty two (22)
 - Five (5) Special Agents
 - Seven (7) VMS/IT Specialists
 - One (1) VMS Program Analyst
 - One (1) Program Specialist
 - One (1) Program Analysts
 - Two (2) Financial Management Specialists
 - One (1) Budget Analyst
 - One (1) JEA Program Analyst
 - One (1) Office Automation

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Civil Invest. | Admin. | Total |
|------------------------------|--------------------|------------------------|---------------|----------------------|---------------|--------------|
| NOAA HQ Silver Spring, MD | 3 | 1 | 4 | 0 | 16 | 24 |
| FLETC Glynco, GA | 1 | 0 | 1 | 0 | 0 | 2 |
| VMS/IT COOP Seattle, WA | 0 | 0 | 0 | 0 | 1 | 1 |
| 2012 Totals | 4 | 1 | 5 | 0 | 17 | 27 |

HQ 2012 STAFFING



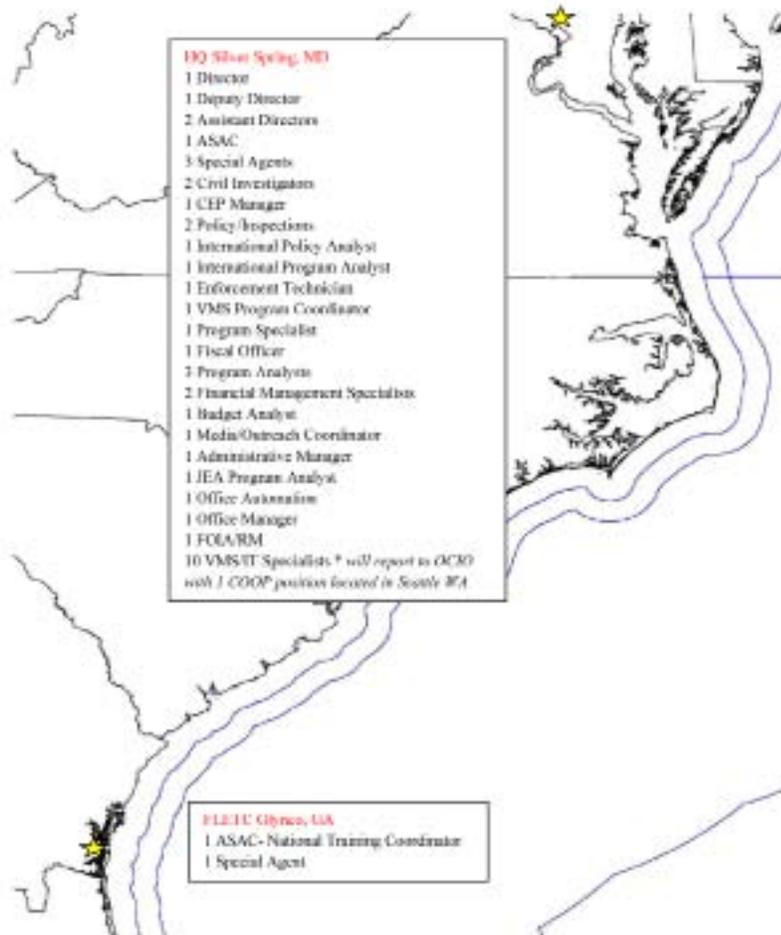
HQ Proposed Future Staffing Levels

The long-term proposed staffing for HQ would be comprised of forty three (43) FTE positions broken out as follows:

- Supervisory, eight (8)
 - One (1) Director (1801 series)
 - One (1) Deputy Director (1801 series)
 - Two (2) Assistant Directors(1801 and 0341 series)
 - Two (2) ASACs (1811 series)
 - One (1) Administrative Manager
 - One (1) Fiscal Officer
- Non-Supervisory, thirty five (35)
 - Four (4) Special Agents
 - Two (2) Civil Investigators (1801 series)
 - One (1) CEP Manager (probable 1801 series)
 - Two (2) Policy/Inspections (probable 1801 series)
 - One (1) International Policy Analyst
 - One (1) International Program Analyst
 - One (1) Enforcement Technician
 - One (1) VMS Program Coordinator
 - One (1) Program Specialist
 - Three (3) Program Analysts
 - Two (2) Financial Management Specialists
 - One (1) Budget Analyst
 - One (1) Media/Outreach Coordinator
 - One (1) JEA Program Analyst
 - One (1) Office Automation
 - One (1) Office Manager
 - One (1) FOIA/RM
 - Ten (10) VMS/IT Specialists **Starting in FY13 these positions will be paid for by OLE and will report to OCIO*

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Civil Invest. | Admin. | Total |
|------------------------------|-------------|-----------------|----------|---------------|-----------|-----------|
| NOAA HQ Silver Spring, MD | 4 | 1 | 3 | 5 | 27 | 40 |
| FLETC Glynco, GA | 1 | 0 | 1 | 0 | 0 | 2 |
| VMS/IT COOP Seattle, WA | 0 | 0 | 0 | 0 | 1 | 1 |
| Future Totals | 5 | 1 | 4 | 5 | 28 | 43 |

HQ PROPOSED FUTURE STAFFING



Northeast Enforcement Division

The Northeast Enforcement Division (NED) is lead out of Gloucester, MA, and its area of responsibility (AOR) encompasses the coastal states of Maine, New Hampshire, Massachusetts, Rhode Island, Connecticut, New York, New Jersey, Delaware, Maryland, and Virginia, as well as the non-coastal states of Vermont, Pennsylvania, West Virginia, Ohio, Indiana, Illinois, Michigan, Wisconsin, Iowa, Minnesota, the District of Columbia and the Great Lakes. The Atlantic States in the Northeast Division have a coastline of approximately 997 miles, over 16,000 miles of tidal shoreline and over 100,000 square miles of EEZ. New England is the seafood gateway to the U.S. Approximately 60% of Canadian imported product enters the U.S. market through New England. In addition to fishermen and boats, New England has an extensive shore-side industry which includes primary processors, secondary processors, marketing and sales and distribution companies. There are more than 430 seafood companies and 170 seafood industry processors in New England which have a total combined annual sales of USD \$5.2 billion and USD \$2.9 billion, respectively. The seafood industry (companies and processors) employs nearly 20,000 people and provides more than USD \$600 million in annual wages. The NED has approximately 379 ports that have documented commercial landings of federally regulated species.

NED is responsible for enforcing domestic commercial and recreational fishing regulations promulgated in 19 fishery management plans managing hundreds of regulated species with significant dealer and vessel reporting requirements under the Magnuson Act; protecting marine species and critical habitats under the Endangered Species Act and Marine Mammal Protection Act; monitoring imports and exports of marine products at ports of entry and border crossings under the Lacey Act and protecting essential fish habitats and National Marine Sanctuaries.

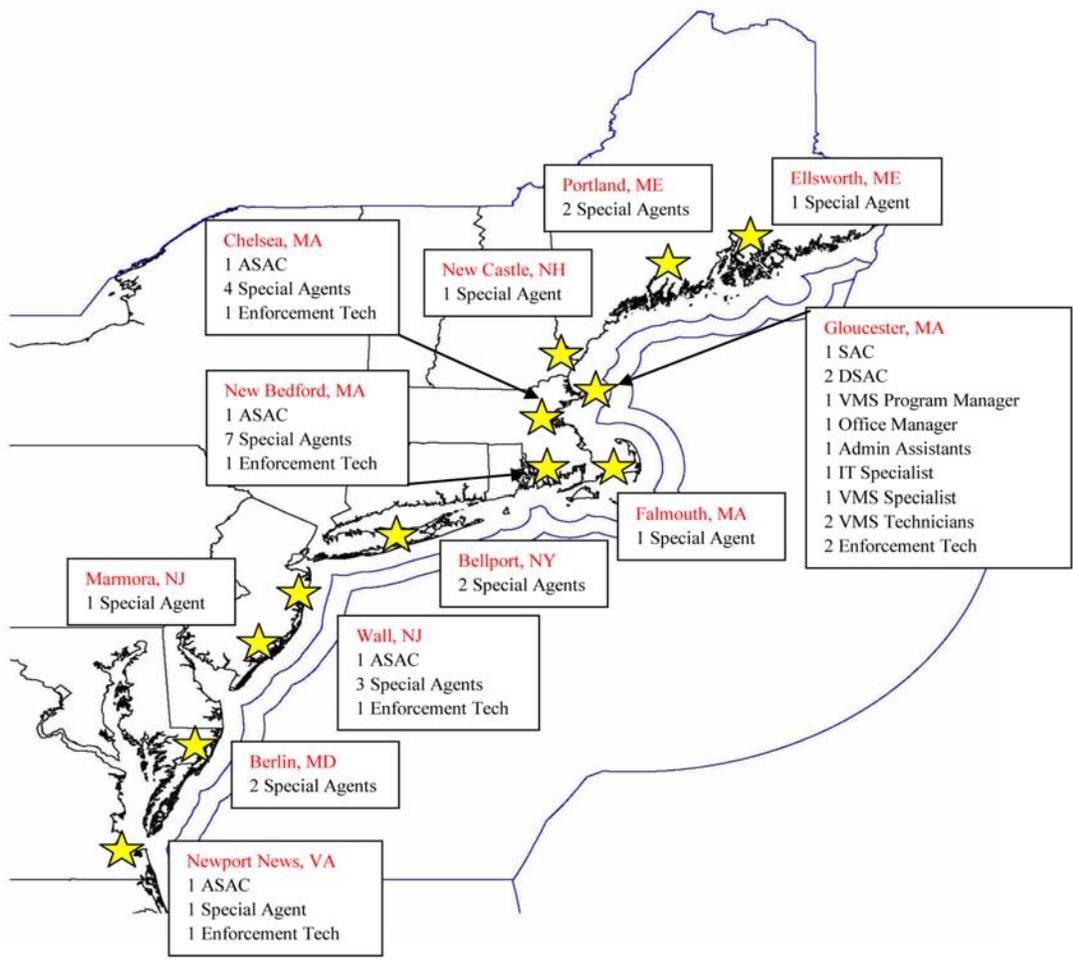
Staffing Comparison Summary

Selected Baseline Staffing Levels

In February 2010, the NED was comprised of forty five (45) full time employees (FTE) positions that were broken out as follows:

- Supervisory, eight (8)
 - One (1) SAC
 - Two (2) DSACs
 - Four (4) ASACs
 - One (1) VMS Program Manager
- Non-Supervisory, thirty-seven (37)
 - Twenty-five (25) Special Agents
 - Two (2) VMS Technicians
 - One (1) VMS Specialist
 - One (1) Office Manager
 - Five (5) Enforcement Technicians
 - One (1) IT Specialist
 - One (1) JEA Program Coordinator
 - One (1) Administrative Assistant

| Duty Station | District | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|-------------------|----------|-------------|-----------------|-----------|----------|-----------|-----------|
| Ellsworth, ME | One | 0 | 0 | 1 | 0 | 0 | 1 |
| Portland ME | One | 0 | 0 | 2 | 0 | 0 | 2 |
| New Castle, NH | One | 0 | 0 | 1 | 0 | 0 | 1 |
| Gloucester, MA | One | 3 | 1 | 0 | 0 | 8 | 12 |
| Chelsea, MA | One | 1 | 0 | 4 | 0 | 1 | 6 |
| Falmouth, MA | Two | 0 | 0 | 1 | 0 | 0 | 1 |
| New Bedford, MA | Two | 1 | 0 | 7 | 0 | 1 | 9 |
| Bellport, NY | Three | 0 | 0 | 2 | 0 | 0 | 2 |
| Wall, NJ | Three | 1 | 0 | 3 | 0 | 1 | 5 |
| Marmora, NJ | Three | 0 | 0 | 1 | 0 | 0 | 1 |
| Berlin, MD | Four | 0 | 0 | 2 | 0 | 0 | 2 |
| Newport News, VA | Four | 1 | 0 | 1 | 0 | 1 | 3 |
| 2010 Total | | 7 | 1 | 25 | 0 | 12 | 45 |



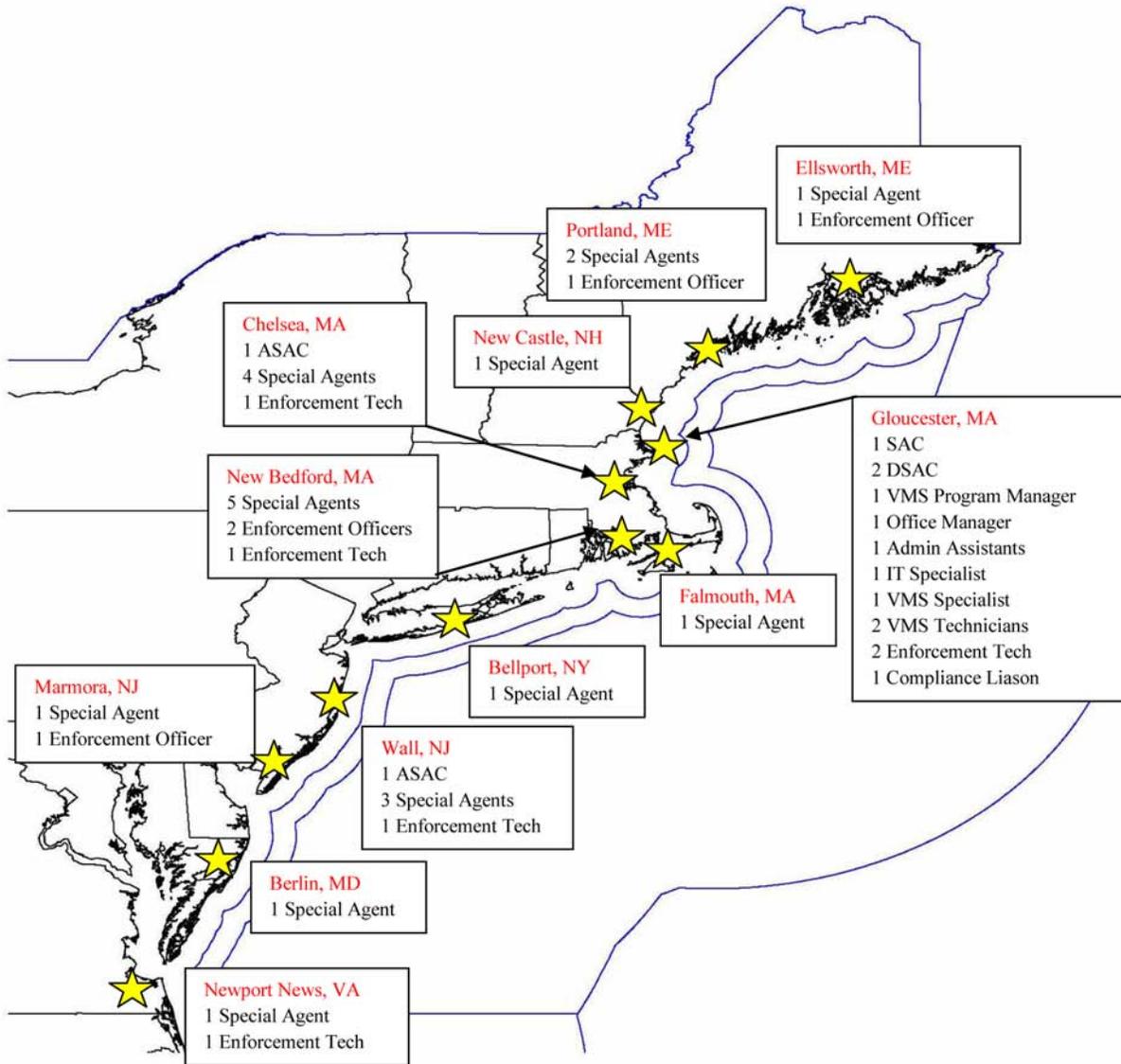
Current Staffing Level

As of January 2012, the NED is comprised of forty four (44) FTE positions broken out as follows:

- Supervisory, six (6)
 - One (1) SAC
 - Two (2) DSACs
 - Two (2) ASACs
 - One (1) VMS Program Manager
- Non-Supervisory, thirty eight (38)
 - Twenty-one (21) Special Agents
 - Five (5) Enforcement Officers
 - Three (3) VMS Technicians
 - One (1) VMS Specialist
 - Four (4) Enforcement Technicians
 - One (1) IT Specialist
 - One (1) JEA Program Coordinator
 - One (1) Administrative Assistant
 - One (1) Compliance Assistance

| Duty Station | District | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|--------------------|----------|-------------|-----------------|-----------|----------|-----------|-----------|
| Ellsworth, ME | One | 0 | 0 | 1 | 1 | 0 | 2 |
| Portland ME | One | 0 | 0 | 2 | 1 | 0 | 3 |
| New Castle, NH | One | 0 | 0 | 1 | 0 | 0 | 1 |
| Gloucester, MA | One | 3 | 1 | 0 | 0 | 9 | 13 |
| Chelsea, MA | One | 1 | 0 | 4 | 0 | 1 | 6 |
| Falmouth, MA | Two | 0 | 0 | 1 | 0 | 0 | 1 |
| New Bedford, MA | Two | 0 | 0 | 5 | 2 | 1 | 8 |
| Bellport, NY | Three | 0 | 0 | 1 | 0 | 0 | 1 |
| Wall, NJ | Three | 1 | 0 | 3 | 0 | 0 | 4 |
| Marmora, NJ | Three | 0 | 0 | 1 | 1 | 0 | 2 |
| Berlin, MD | Four | 0 | 0 | 1 | 0 | 0 | 1 |
| Newport News, VA | Four | 0 | 0 | 1 | 0 | 1 | 2 |
| 2012 Totals | | 5 | 1 | 21 | 5 | 12 | 44 |

NORTHEAST DIVISION 2012 STAFFING



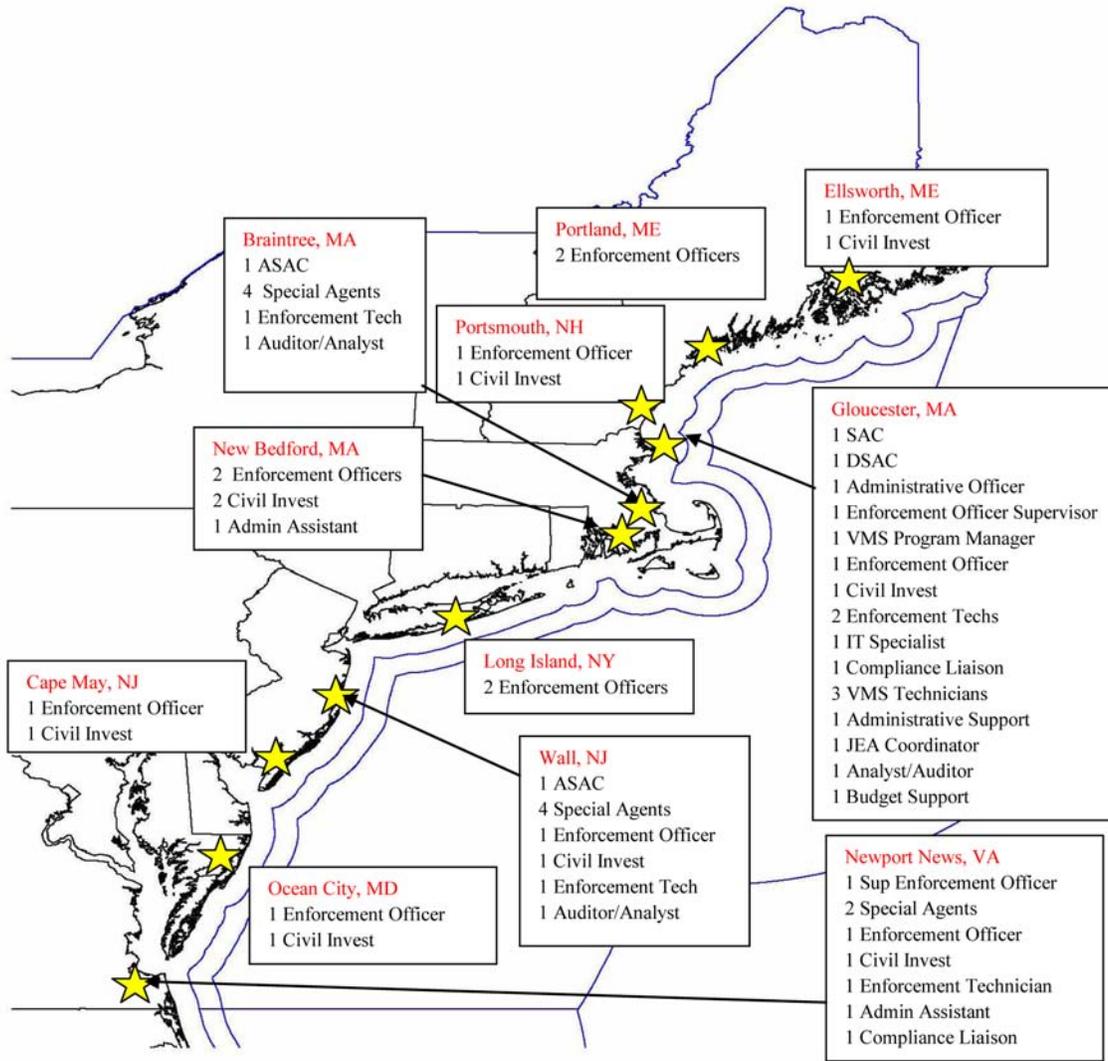
Proposed Future Staffing Levels

The long-term proposed staffing for the NED would be comprised of fifty nine (59) FTE positions broken out as follows:

- Supervisory, eight (8)
 - One (1) SAC
 - One (1) DSAC
 - One (1) Administrative Officer
 - Two (2) ASACs
 - Two (2) Enforcement Officers Supv.
 - One (1) VMS Program Manager
- Non-Supervisory, fifty one (51)
 - Ten (10) Special Agents
 - Thirteen (13) Enforcement Officers
 - Nine (9) Civil Investigators
 - Three (3) VMS Technicians
 - Five (5) Enforcement Technicians
 - One (1) IT Specialist
 - One (1) JEA Program Coordinator
 - Three (3) Administrative Assistants
 - Two (2) Compliance Assistants
 - Three (3) Investigative Analysts/Auditors
 - One (1) Budget

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers/Civil Investigators | Admin. | Total |
|----------------------|-------------|-----------------|-----------|------------------------------|-----------|-----------|
| Ellsworth, ME | 0 | 0 | 0 | 2 | 0 | 2 |
| Portland ME | 0 | 0 | 0 | 2 | 0 | 2 |
| Portsmouth, NH | 0 | 0 | 0 | 2 | 0 | 2 |
| Gloucester, MA | 3 | 2 | 0 | 2 | 11 | 18 |
| Braintree, MA | 1 | 0 | 4 | 0 | 2 | 7 |
| New Bedford, MA | 0 | 0 | 0 | 4 | 1 | 5 |
| Long Island, NY | 0 | 0 | 0 | 2 | 0 | 2 |
| Wall, NJ | 1 | 0 | 4 | 2 | 2 | 9 |
| Cape May, NJ | 0 | 0 | 0 | 2 | 0 | 2 |
| Ocean City, MD | 0 | 0 | 0 | 2 | 0 | 2 |
| Newport News, VA | 1 | 0 | 2 | 2 | 3 | 8 |
| Future Totals | 6 | 2 | 10 | 22 | 19 | 59 |

NORTHEAST DIVISION PROPOSED FUTURE STAFFING



Southeast Enforcement Division

The Southeast Division's (SED) divisional office is located in St. Petersburg, FL and its coastal area of responsibility (AOR) encompasses the states of North Carolina, South Carolina, Georgia, Florida, Alabama, Mississippi, Louisiana, Texas, Puerto Rico and the U.S. Virgin Islands (USVI). These 8 coastal states and 2 island territories comprise 3,700 miles of coastline with 29,900 miles of tidal shoreline and contain four National Marine Sanctuaries. The region is governed by 40% of the Nation's coastal state resource agencies, three Regional Fisheries Management Councils and two Interstate Marine Fisheries Commissions. Additionally, the region supports the largest recreational fisheries in the Nation.

The Southeast Division has a broad range of enforcement responsibilities in recreational and commercial marine fisheries, from covering finfish such as snapper and grouper and including commercial catch share programs to Highly Migratory Species such as shark, tuna and swordfish. In addition, the Southeast Division monitors protected resources such as dolphins and marine turtles and three National Marine Sanctuaries (Florida Keys, Gray's Reef and Flower Garden Banks).

Staffing Comparison Summary

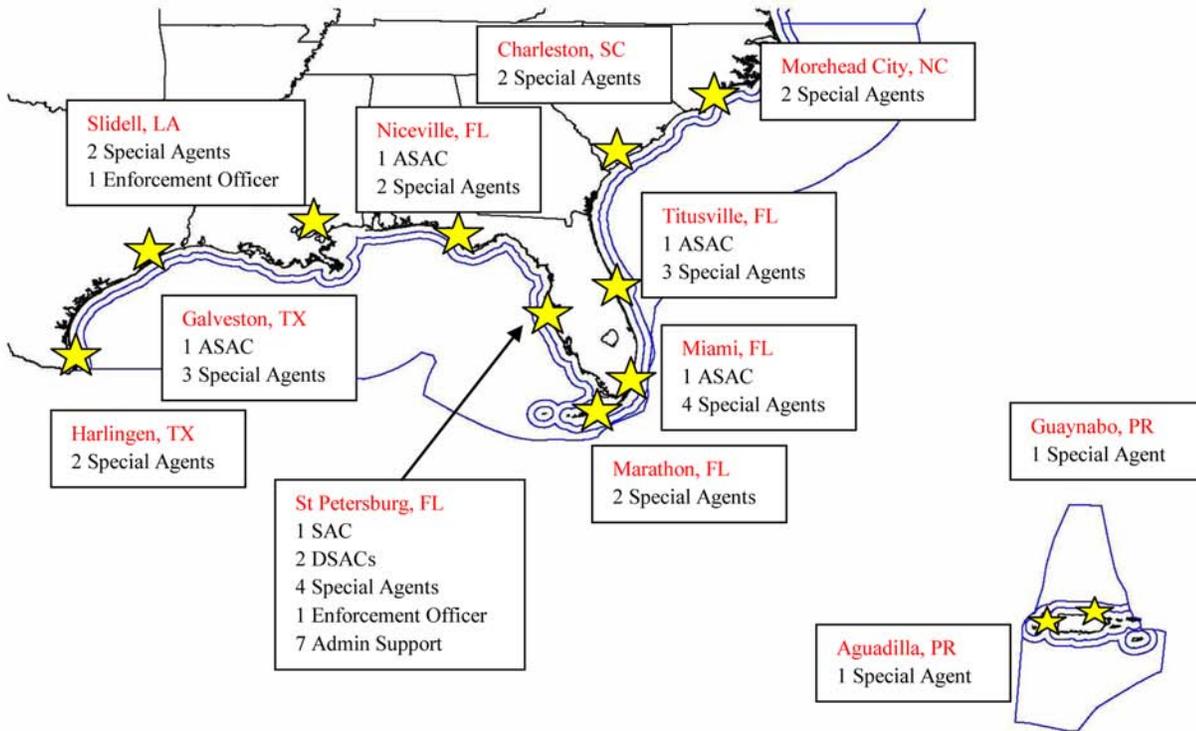
Selected Baseline Staffing Levels

In February 2010, the SED was comprised of forty four (44) full time employees (FTE) positions that were broken out as follows:

- Supervisory, eight (8)
 - One (1) SAC
 - Two (2) DSACs
 - Four (4) ASACs
 - One (1) VMS Program Manager
- Non-Supervisory, thirty six (36)
 - Twenty Seven (27) Special Agents
 - Two (2) Enforcement Officers (EO)
 - Two (2) Enforcement Technicians
 - One (1) JEA Coordinator
 - One (1) IT Specialist
 - One (1) Administrative Officer
 - One (1) Administrative Assistant
 - One (1) Support Services Specialist

| Duty Station | District | Sworn Supv. | Non- Sworn Supv. | Agents | Officers | Admin. | Total |
|--------------------|----------|-------------|------------------|-----------|----------|----------|-----------|
| Morehead City, NC | One | 0 | 0 | 2 | 0 | 0 | 2 |
| Charleston, SC | One | 0 | 0 | 2 | 0 | 0 | 2 |
| Titusville, FL | One | 1 | 0 | 3 | 0 | 0 | 4 |
| Miami, FL | Two | 1 | 0 | 4 | 0 | 0 | 5 |
| Marathon, FL | Two | 0 | 0 | 2 | 0 | 0 | 2 |
| Guaynabo, PR | Two | 0 | 0 | 1 | 0 | 0 | 1 |
| Aguadilla, PR | Two | 0 | 0 | 1 | 0 | 0 | 1 |
| St. Petersburg, FL | Three | 3 | 1 | 4 | 1 | 7 | 16 |
| Niceville, FL | Three | 1 | 0 | 2 | 0 | 0 | 3 |
| Slidell, LA | Four | 0 | 0 | 2 | 1 | 0 | 3 |
| Galveston, TX | Four | 1 | 0 | 2 | 0 | 0 | 3 |
| Harlingen, TX | Four | 0 | 0 | 2 | 0 | 0 | 2 |
| 2010 Totals | | 7 | 1 | 27 | 2 | 7 | 44 |

SOUTHEAST DIVISION 2010 STAFFING

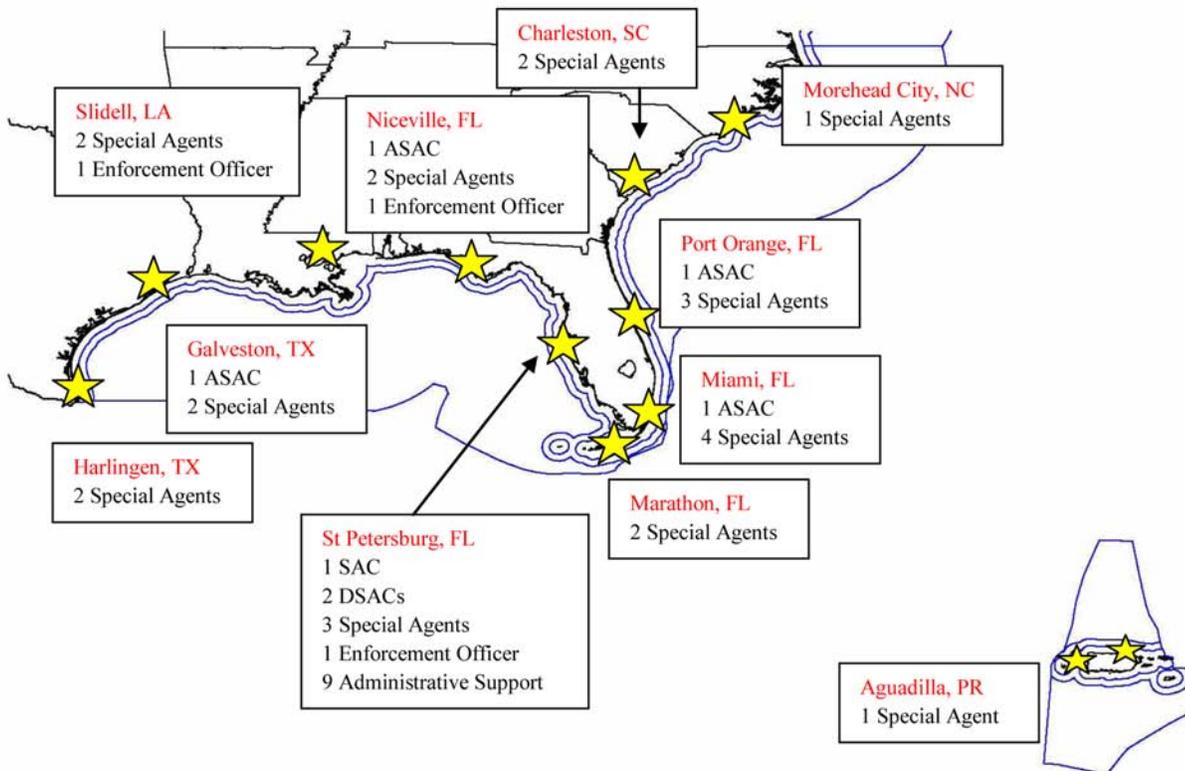


Current Staffing Level

As of January 2012, the SED is comprised of forty four (44) FTE positions as follows:

- Supervisory, eight (8)
 - One (1) SAC – Vacant
 - Two (2) DSACs
 - Four (4) ASACs
 - One (1) VMS Program Manager
- Non-Supervisory, thirty six (36)
 - Twenty four (24) Special Agents
 - Three (3) Enforcement Officers (EO)
 - Two (2) Enforcement Technicians
 - Three (3) VMS Technicians
 - One (1) IT Specialist
 - One (1) Administrative Officer
 - One (1) Administrative Assistant
 - One (1) Support Services Specialist

| Duty Station | Sworn Supv. | Non- Sworn Supv. | Agents | Officers | Admin. | Total |
|--------------------|-------------|------------------|-----------|----------|----------|-----------|
| Morehead City, NC | 0 | 0 | 1 | 0 | 0 | 1 |
| Charleston, SC | 0 | 0 | 2 | 0 | 0 | 2 |
| Port Orange, FL | 1 | 0 | 3 | 0 | 0 | 4 |
| Miami, FL | 1 | 0 | 4 | 0 | 0 | 5 |
| Marathon, FL | 0 | 0 | 2 | 0 | 0 | 2 |
| Aguadilla, PR | 0 | 0 | 1 | 0 | 0 | 1 |
| St. Petersburg, FL | 3 | 1 | 3 | 1 | 9 | 17 |
| Niceville, FL | 1 | 0 | 2 | 1 | 0 | 4 |
| Slidell, LA | 0 | 0 | 2 | 1 | 0 | 3 |
| Galveston, TX | 1 | 0 | 2 | 0 | 0 | 3 |
| Harlingen, TX | 0 | 0 | 2 | 0 | 0 | 2 |
| 2012 Totals | 7 | 1 | 24 | 3 | 9 | 44 |



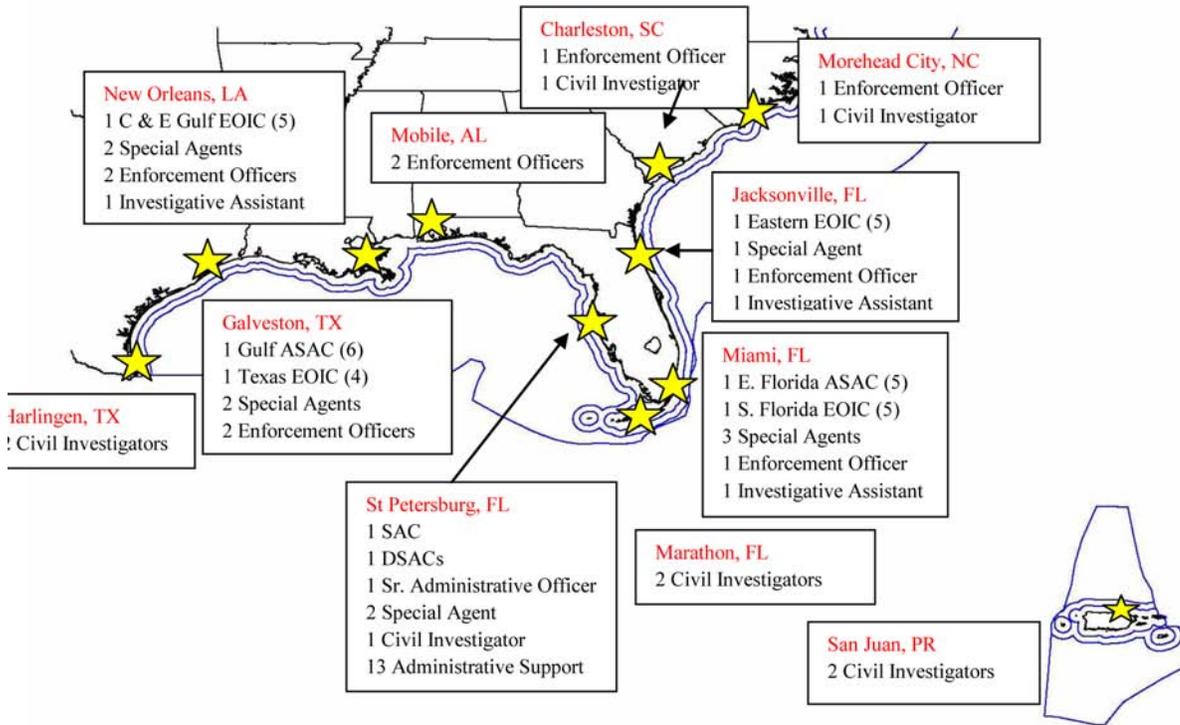
Proposed Future Staffing Levels

The long-term proposed staffing for the SED would be comprised of fifty four (54) FTE positions broken out as follows:

- Supervisory, ten (10)
 - One (1) SAC
 - One (1) DSAC
 - One (1) Administrative Officer
 - Two (2) ASACs
 - Four (4) Enforcement Officer Supv
 - One (1) VMS Program Manager
- Non-Supervisory, forty four (44)
 - Ten (10) Special Agents
 - Ten (10) Enforcement Officers
 - Nine (9) Civil Investigators
 - Four (4) VMS Technicians
 - Six (6) Enforcement Technicians/Investigative Assistants
 - One (1) IT Specialist
 - One (1) JEA Program Coordinator
 - One (1) Administrative Assistant
 - Two (2) Administrative Support

| Duty Station | Sworn Supv. | Non- Sworn Supv. | Agents | Officers/Civil Investigators | Admin. | Total |
|--------------------|-------------|------------------|-----------|------------------------------|-----------|-----------|
| Morehead City, NC | 0 | 0 | 0 | 2 | 0 | 2 |
| Charleston, SC | 0 | 0 | 0 | 2 | 0 | 2 |
| Jacksonville, FL | 1 | 0 | 1 | 1 | 1 | 4 |
| Miami, FL | 2 | 0 | 3 | 1 | 1 | 7 |
| Marathon, FL | 0 | 0 | 0 | 2 | 0 | 2 |
| San Juan, PR | 0 | 0 | 0 | 2 | 0 | 2 |
| St. Petersburg, FL | 2 | 2 | 2 | 1 | 12 | 19 |
| Mobile, AL | 0 | 0 | 0 | 2 | 0 | 2 |
| New Orleans, LA | 1 | 0 | 2 | 2 | 1 | 6 |
| Galveston, TX | 2 | 0 | 2 | 2 | 0 | 6 |
| Harlingen, TX | 0 | 0 | 0 | 2 | 0 | 2 |
| 2012 Totals | 8 | 2 | 10 | 19 | 15 | 54 |

SOUTHEAST DIVISION PROPOSED FUTURE STAFFING



Southwest Enforcement Division

The Southwest Enforcement Division (SWED) of NOAA's Office of Law Enforcement (OLE) provides marine enforcement and compliance assistance for the Southwest Region, encompassing Arizona, Nevada and California. SWED staff is stationed throughout California at the following locations: San Diego, Long Beach, Santa Maria, Monterey Bay, Sacramento, Santa Rosa and Arcata. The Division's area of responsibility includes, approximately 600 miles of Mexican Border which traverses a variety of terrains, including urban areas and deserts. In addition, the region consists of 1,100 miles of Pacific Ocean coastline, 4 major international seaports, 16 international airports, 32 total ports of entry, 220,000 square nautical miles of Pacific Ocean, and in California alone 155,779 square miles of land encompassing numerous rivers and tributaries feed into the Pacific Ocean, with a population of over 37 million.

The SWED enforces domestic fishing regulations under the Magnuson Act; protects marine species and critical habitats under the Endangered Species Act and Marine Mammal Protection Act; monitors imports and exports of marine products at ports of entry and border crossings under the Lacey Act; as well as protects essential fish habitats, provides compliance assistance, and protects four National Marine Sanctuaries: Gulf of the Farallones, Channel Island, Monterey Bay and Cordell Bank.

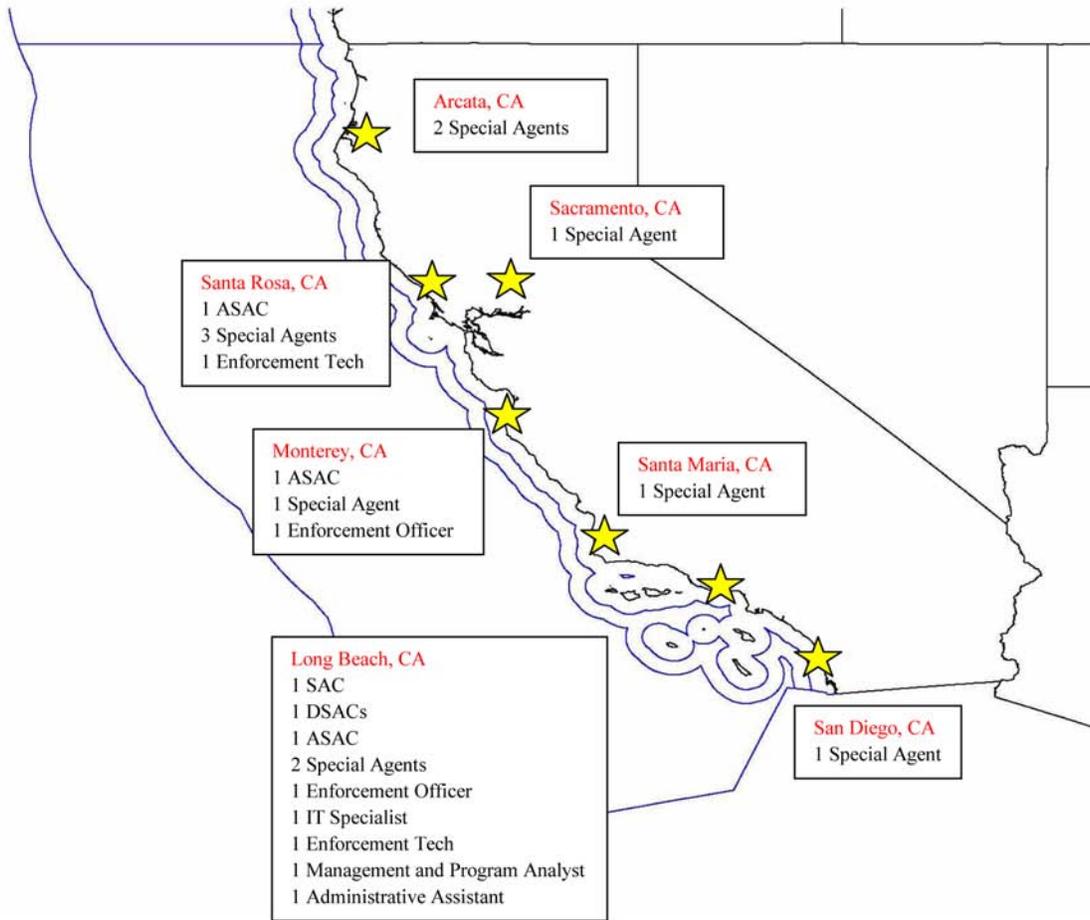
Staffing Comparison Summary

Selected Baseline Staffing Levels

In February 2010, the SWED was comprised of twenty three (23) full time employees (FTE) positions that were broken out as follows:

- Supervisory, five (5)
 - One (1) SAC
 - One (1) DSAC
 - Three (3) ASACs
- Non-Supervisory, eighteen (18)
 - Eleven (11) Special Agents
 - Two (2) Enforcement Officers (EO)
 - One (1) Management and Program Analyst
 - Two (2) Enforcement Technicians
 - One (1) IT Specialist
 - One (1) Administrative Assistant

| Duty Station | District | Sworn Supv. | Agents | Officers | Admin. | TOTAL |
|--------------------|----------|-------------|-----------|----------|----------|-----------|
| San Diego | One | 0 | 1 | 0 | 0 | 1 |
| Long Beach | One | 3 | 2 | 1 | 4 | 10 |
| Santa Maria | One | 0 | 1 | 0 | 0 | 1 |
| Monterey Bay | Two | 1 | 1 | 1 | 0 | 3 |
| Sacramento | Two | 0 | 1 | 0 | 0 | 1 |
| Santa Rosa | Three | 1 | 3 | 0 | 2 | 6 |
| Arcata | Three | 0 | 2 | 0 | 0 | 2 |
| 2010 TOTALS | | 5 | 11 | 2 | 6 | 23 |



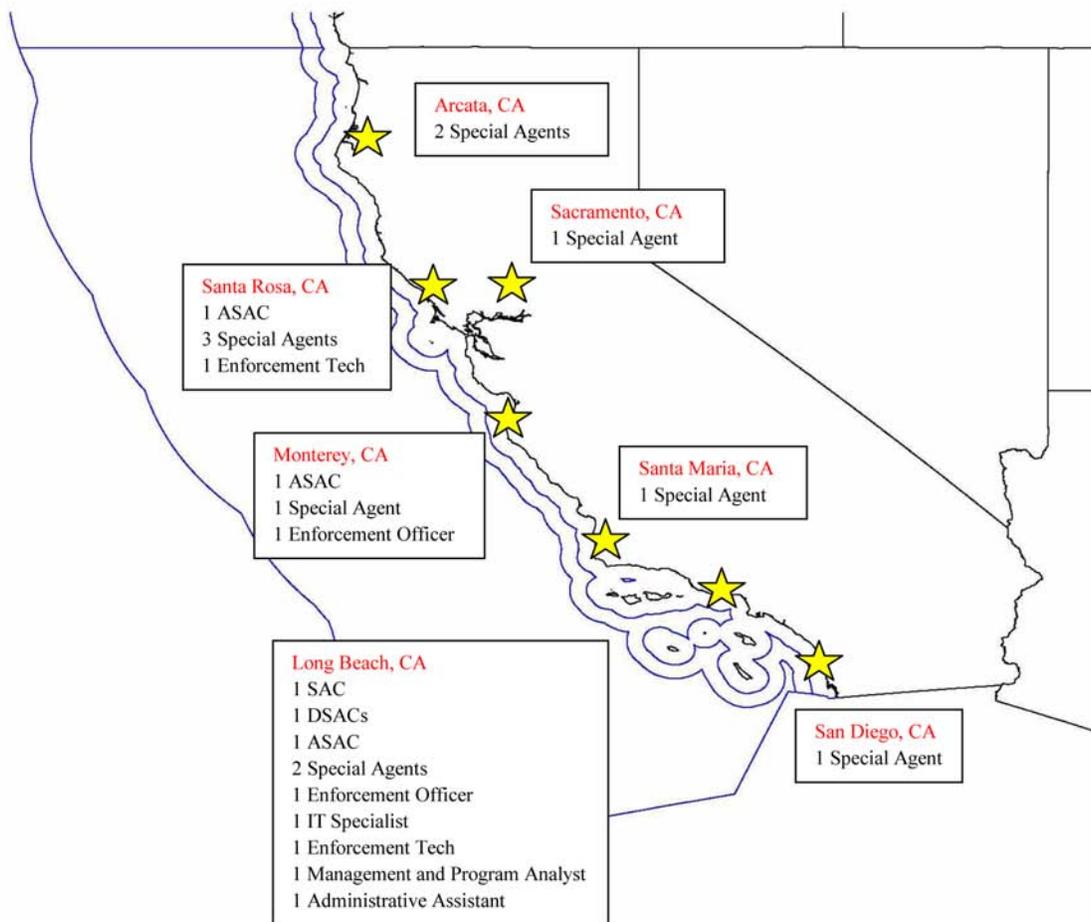
Current Staffing Level

As of January 2012, the SWED is comprised of eighteen (18) FTE positions broken out as follows:

- Supervisory, four (4)
 - One (1) SAC
 - One (1) DSAC
 - Two (2) ASACs
- Non-Supervisory, fourteen (14)
 - Eight (8) Special Agents
 - One (1) Enforcement Officers (EO)
 - One (1) Management and Program Analyst
 - Two (2) Enforcement Technicians
 - One (1) IT Specialist
 - One (1) Administrative Assistant

| Duty Station | District | Sworn Supv. | Agents | Officers | Admin. | TOTAL |
|---------------------|-----------------|--------------------|---------------|-----------------|---------------|--------------|
| San Diego | One | 0 | 1 | 0 | 0 | 1 |
| Long Beach | One | 3 | 1 | 0 | 4 | 8 |
| Santa Maria | One | 0 | 1 | 0 | 0 | 1 |
| Monterey Bay | Two | 1 | 1 | 1 | 0 | 3 |
| Sacramento | Two | 0 | 1 | 0 | 0 | 1 |
| Santa Rosa | Three | 0 | 2 | 0 | 1 | 3 |
| Arcata | Three | 0 | 1 | 0 | 0 | 1 |
| 2012 TOTALS | | 4 | 8 | 1 | 5 | 18 |

SOUTHWEST DIVISION 2012 STAFFING

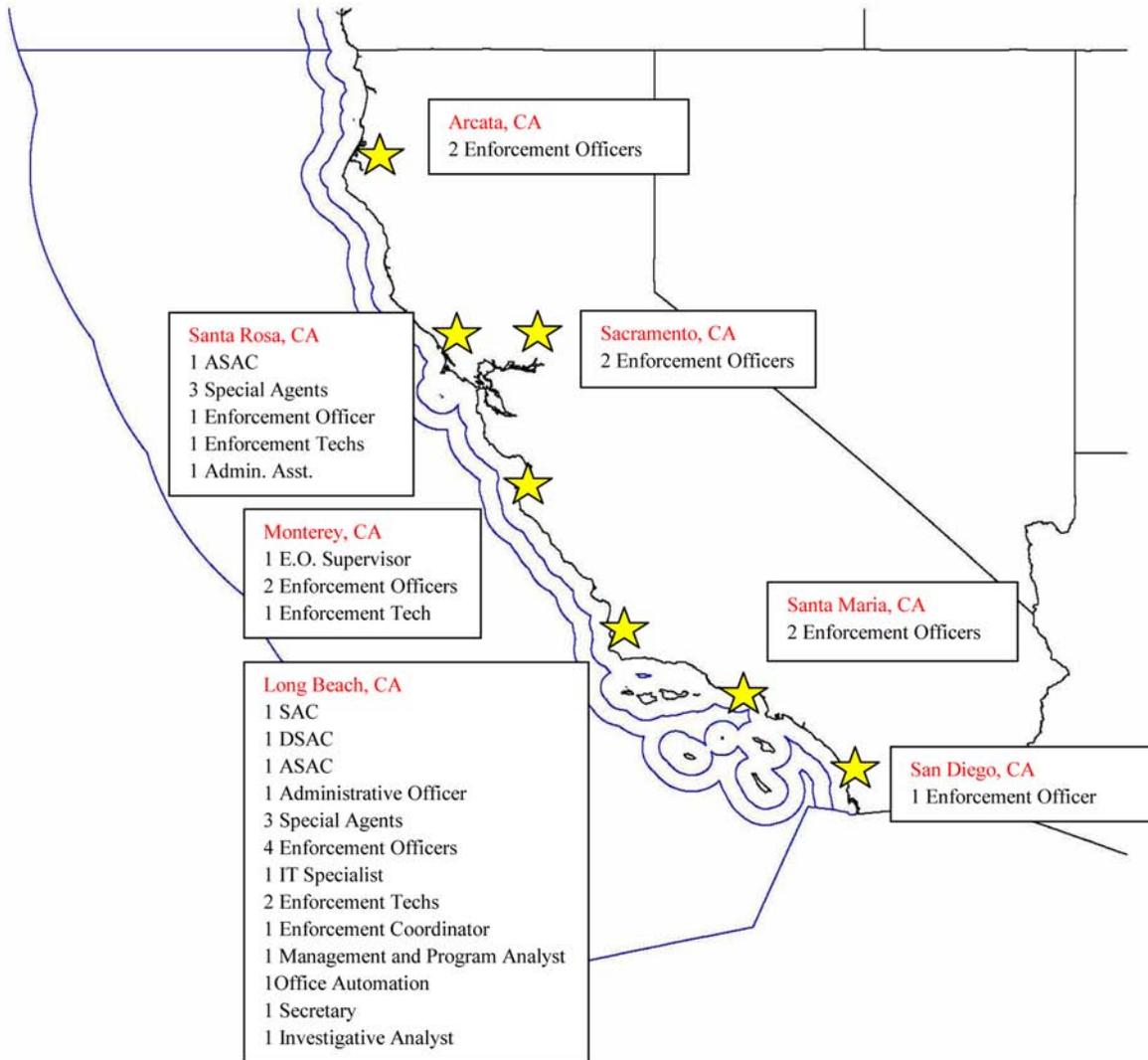


Proposed Future Staffing Levels

The long-term proposed staffing for the SWED would be comprised of thirty seven (37) FTE positions broken out as follows:

- Supervisory, six (6)
 - One (1) SAC
 - One (1) DSAC
 - One (1) Administrative Officer
 - One (1) ASACs
 - Two (2) Enforcement Officer (Supv)
- Non-Supervisory, thirty one (31)
 - Six (6) Special Agents
 - Fourteen (14) Enforcement Officers (EO)
 - One (1) Investigative Analyst
 - One (1) Management and Program Analyst
 - Four (4) Enforcement Technicians
 - One (1) IT Specialist
 - Two (2) Administrative Assistant
 - One (1) Secretary
 - One (1) Enforcement Coordinator

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | TOTAL |
|----------------------|-------------|-----------------|----------|-----------|-----------|-----------|
| San Diego | 0 | 0 | 1 | 1 | 0 | 2 |
| Long Beach | 3 | 1 | 3 | 4 | 8 | 19 |
| Santa Maria | 0 | 0 | 0 | 2 | 0 | 2 |
| Monterey Bay | 1 | 0 | 0 | 2 | 1 | 4 |
| Sacramento | 0 | 0 | 0 | 2 | 0 | 2 |
| Santa Rosa | 1 | 0 | 2 | 1 | 2 | 6 |
| Arcata | 0 | 0 | 0 | 2 | 0 | 2 |
| FUTURE TOTALS | 5 | 1 | 6 | 14 | 11 | 37 |



Northwest Enforcement Division

The Northwest Enforcement Division (NWED) of NOAA's Office of Law Enforcement (OLE) provides fisheries and marine enforcement as well as compliance assistance for the Northwest Region, encompassing Colorado, Idaho, Montana, North Dakota, Oregon, South Dakota, Utah, Washington, and Wyoming. The NWED primarily employs 1811 special agents stationed in Idaho, Oregon, and Washington. The Division's area of responsibility includes 1,500 miles of Canadian Border, 600 miles of rigorous Pacific Ocean coastline, the Puget Sound, twelve international seaports, fourteen international airports, 86,063 square nautical miles of Pacific Ocean, and 610,403 square miles of land encompassing numerous rivers and tributaries feeding into the Pacific Ocean.

The NWED is responsible for enforcing domestic fishing regulations under the Magnuson Act; protecting marine species and critical habitats under the Endangered Species Act and Marine Mammal Protection Act; monitoring imports and exports of marine products at ports of entry and border crossings under the Lacey Act and protecting essential fish habitats and the Olympic Coast National Marine Sanctuary (National Marine Sanctuary Act), and providing compliance assistance.

Staffing Comparison Summary

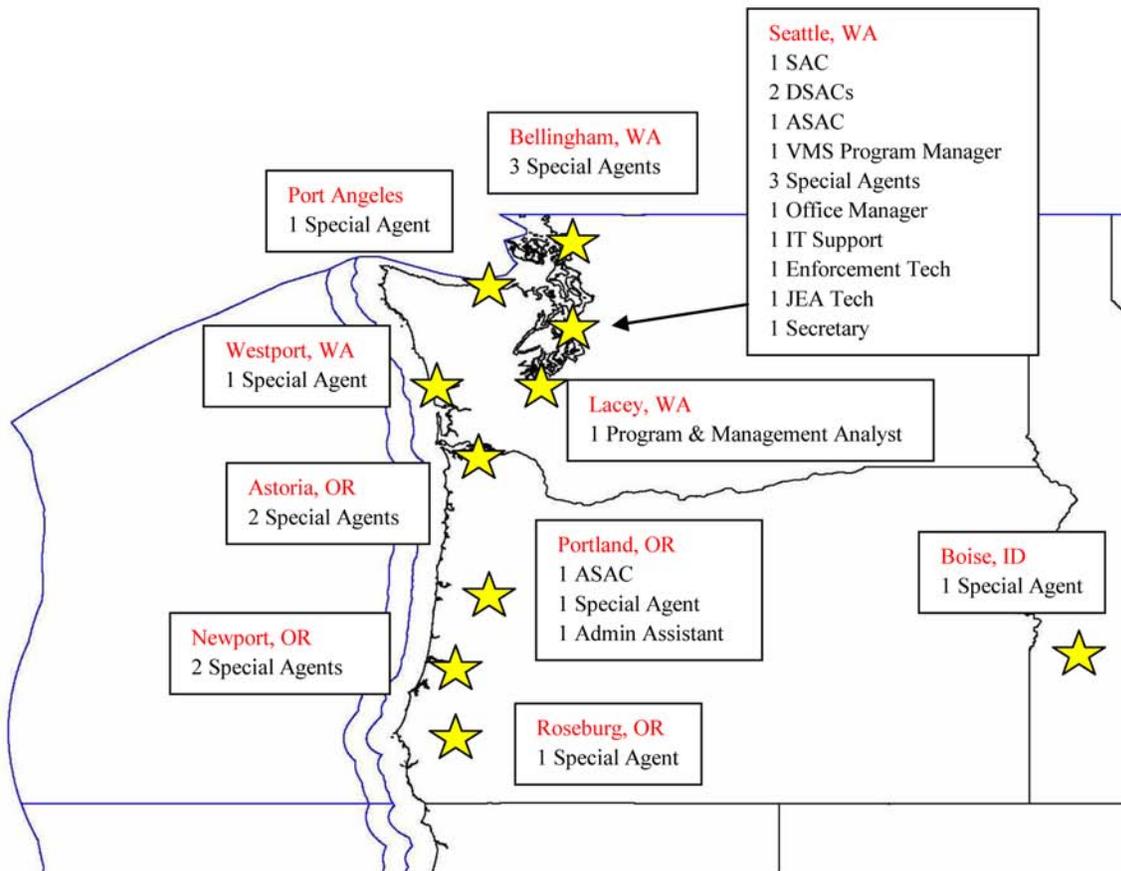
Selected Baseline Staffing Levels

In February 2010, the NWED was comprised of twenty eight (28) full time employees (FTE) positions that were broken out as follows:

- Supervisory, six (6)
 - One (1) SAC
 - Two (2) DSACs
 - Two (2) ASACs
 - One (1) VMS/IT Program Manager (Supv)
- Non-Supervisory, twenty two (22)
 - Fifteen (15) Special Agents
 - One (1) Enforcement Coordinator
 - One (1) Administrative Officer
 - One (1) Administrative Support Assistants
 - One (1) IT Specialist
 - One (1) Enforcement Technicians
 - One (1) JEA Technician
 - One (1) Secretary

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|--------------------|-------------|-----------------|-----------|----------|----------|-----------|
| Seattle | 4 | 1 | 3 | 0 | 5 | 13 |
| Bellingham | 0 | 0 | 3 | 0 | 0 | 3 |
| Port Angeles | 0 | 0 | 1 | 0 | 0 | 1 |
| Westport | 0 | 0 | 1 | 0 | 0 | 1 |
| Lacey | 0 | 0 | 0 | 0 | 1 | 1 |
| Boise | 0 | 0 | 1 | 0 | 0 | 1 |
| Portland | 1 | 0 | 1 | 0 | 1 | 3 |
| Astoria | 0 | 0 | 2 | 0 | 0 | 2 |
| Newport | 0 | 0 | 2 | 0 | 0 | 2 |
| Roseburg | 0 | 0 | 1 | 0 | 0 | 1 |
| 2010 Totals | 5 | 1 | 15 | 0 | 7 | 28 |

NORTHWEST DIVISION 2010 STAFFING



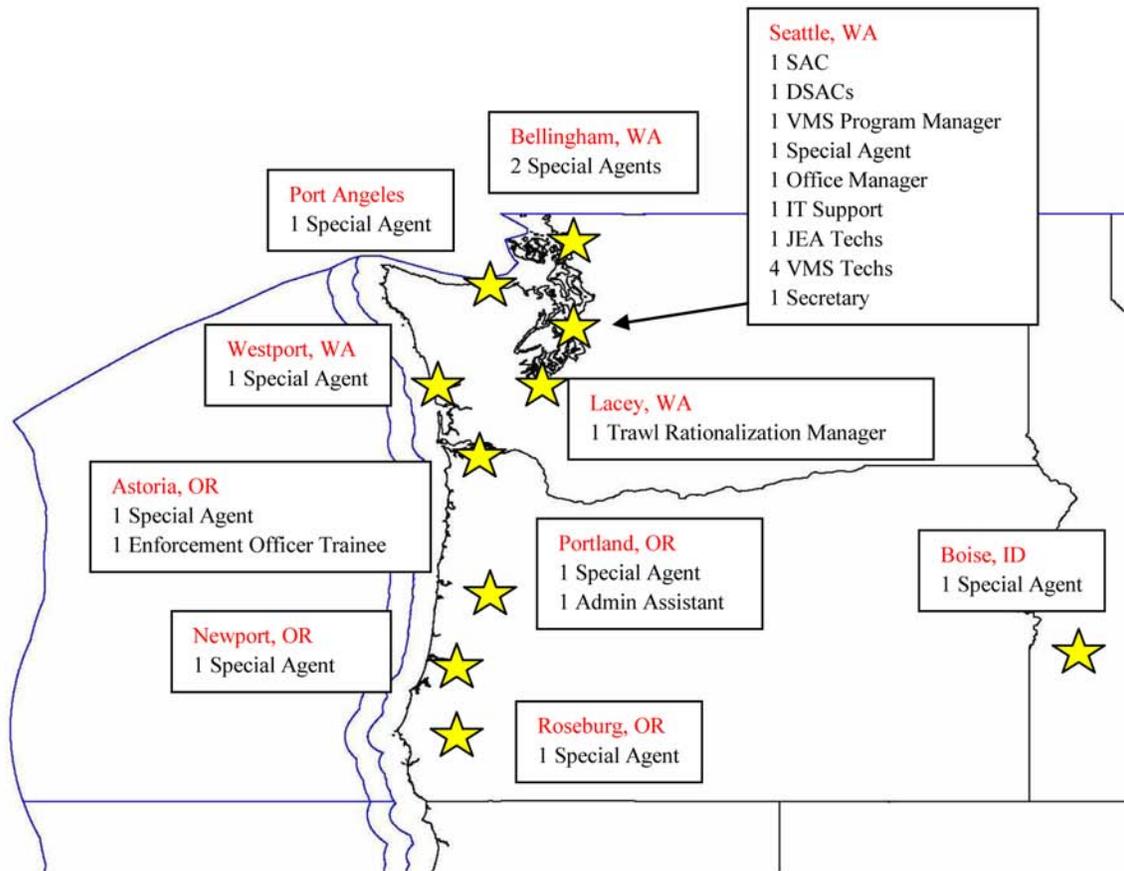
Current Staffing Level

As of January 2012, the NWED is comprised of twenty four (24) FTE positions as follows:

- Supervisory, three (3)
 - One (1) SAC
 - One (1) DSACs
 - One (1) VMS/IT Program Manager (Supv)
- Non-Supervisory, twenty one (21)
 - Ten (10) Special Agents
 - One (1) Enforcement Officer Trainee
 - One (1) Trawl Rationalization Manager
 - One (1) Administrative Manager
 - One (1) IT Specialist
 - Four (4) VMS Technicians
 - One (1) JEA Technician
 - One (1) Administrative Support Assistant
 - One (1) Secretary

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|---------------------|--------------------|------------------------|---------------|-----------------|---------------|--------------|
| Seattle | 2 | 1 | 1 | 0 | 8 | 12 |
| Bellingham | 0 | 0 | 2 | 0 | 0 | 2 |
| Port Angeles | 0 | 0 | 1 | 0 | 0 | 1 |
| Westport | 0 | 0 | 1 | 0 | 0 | 1 |
| Lacey | 0 | 0 | 0 | 0 | 1 | 1 |
| Boise | 0 | 0 | 1 | 0 | 0 | 1 |
| Portland | 0 | 0 | 1 | 0 | 1 | 2 |
| Astoria | 0 | 0 | 1 | 1 | 0 | 2 |
| Newport | 0 | 0 | 1 | 0 | 0 | 1 |
| Roseburg | 0 | 0 | 1 | 0 | 0 | 1 |
| 2012 Totals | 2 | 0 | 10 | 1 | 10 | 24 |

NORTHWEST DIVISION 2012 STAFFING



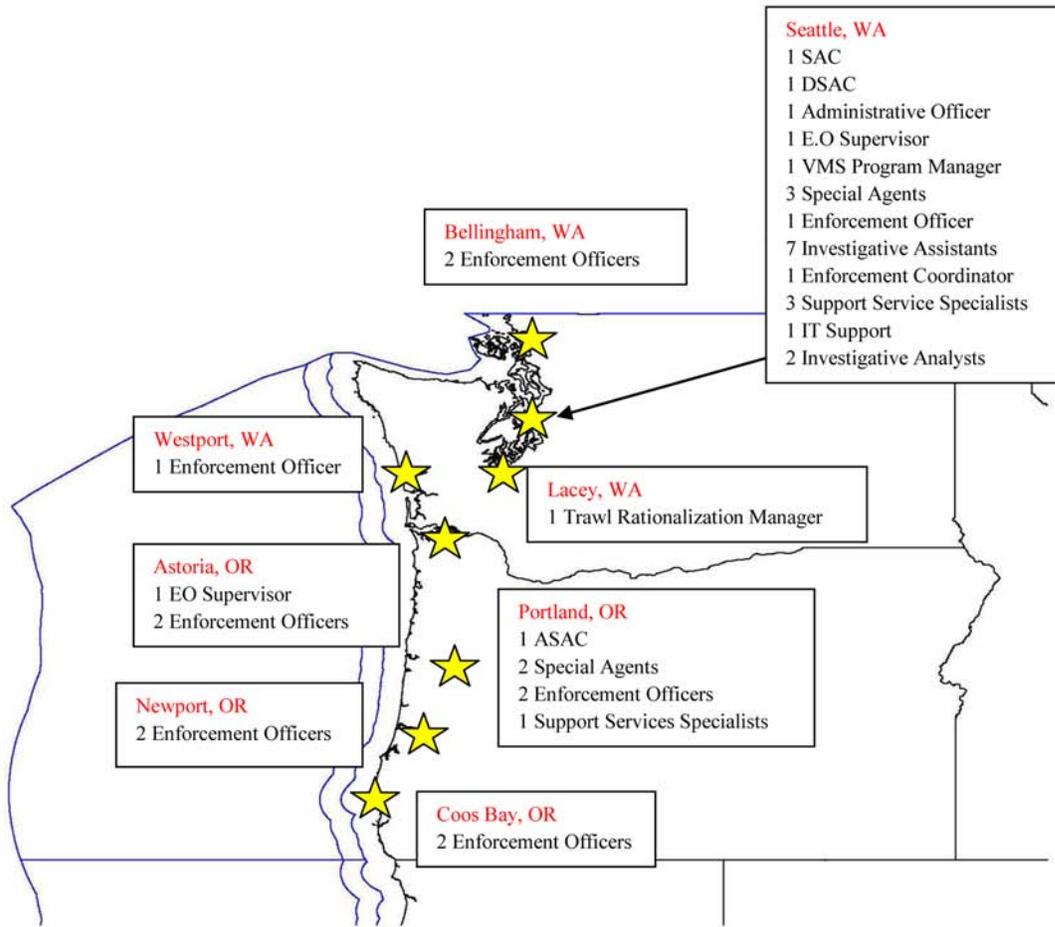
Proposed Future Staffing Levels

The long-term proposed staffing for the NWED would be comprised of thirty nine (39) FTE positions broken out as follows:

- Supervisory, seven (7)
 - One (1) SAC
 - One (1) DSACs
 - One (1) Administrative Officer
 - One (1) ASAC
 - Two (2) Supervisory EO
 - One (1) VMS/IT Program Manager (Supv)
- Non-Supervisory, thirty two (32)
 - Six (6) Special Agents
 - Twelve (12) Enforcement Officers
 - Seven (7) Investigative Assistant
 - One (1) Enforcement Coordinator
 - One (1) Trawl Rationalization Manager
 - Three (3) Support Services Specialists
 - One (1) IT Specialist
 - One (1) Investigative Analyst

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|----------------------|--------------------|------------------------|---------------|-----------------|---------------|--------------|
| Seattle | 3 | 2 | 3 | 1 | 12 | 21 |
| Bellingham | 0 | 0 | 0 | 2 | 0 | 2 |
| Port Angeles | 0 | 0 | 0 | 0 | 0 | 0 |
| Westport | 0 | 0 | 0 | 1 | 0 | 1 |
| Lacey | 0 | 0 | 0 | 0 | 1 | 1 |
| Boise | 0 | 0 | 0 | 0 | 0 | 0 |
| Portland | 1 | 0 | 3 | 2 | 1 | 7 |
| Astoria | 1 | 0 | 0 | 2 | 0 | 3 |
| Newport | 0 | 0 | 0 | 2 | 0 | 2 |
| Roseburg | 0 | 0 | 0 | 0 | 0 | 0 |
| Coos Bay | 0 | 0 | 0 | 2 | 0 | 2 |
| Future Totals | 5 | 2 | 6 | 12 | 14 | 39 |

NORTHWEST DIVISION PROPOSED FUTURE STAFFING



Alaska Enforcement Division

The Alaska Enforcement Division (AKD) is responsible for an area comprised of 842,000 square miles of Exclusive Economic Zone (3 to 200 nautical miles) off the coast of Alaska, 2,690 islands and 6,600 miles of coastline. The state covers 571,951 square miles of remote, mostly wilderness landscape with few roads. The resident population is just 722,190 people, with just over 296,000 residing in the greater Anchorage area. However, the vast majority of commercial fishing activities are based out of remote, geographically dispersed and isolated communities that are both difficult and expensive to access. Most of these communities do not have road access, and travel in and out is accomplished only by small aircraft or vessels. Six Fishery Management Plans, numerous Acts, and eight regulatory schemes governing Alaska fisheries require year-round monitoring and enforcement. Approximately 3 billion pounds of fish, worth over a billion dollars annually, are landed at 93 ports dispersed across the expansive state. Major economic drivers are oil, tourism, and fishing.

The AKD enforces domestic fishing regulations under the Magnuson Act; protecting marine species and critical habitats under the Endangered Species Act and Marine Mammal Protection Act; monitoring imports and exports of marine products at ports of entry and border crossings under the Lacey Act; protecting essential fish habitats; and providing compliance assistance.

Staffing Comparison Summary

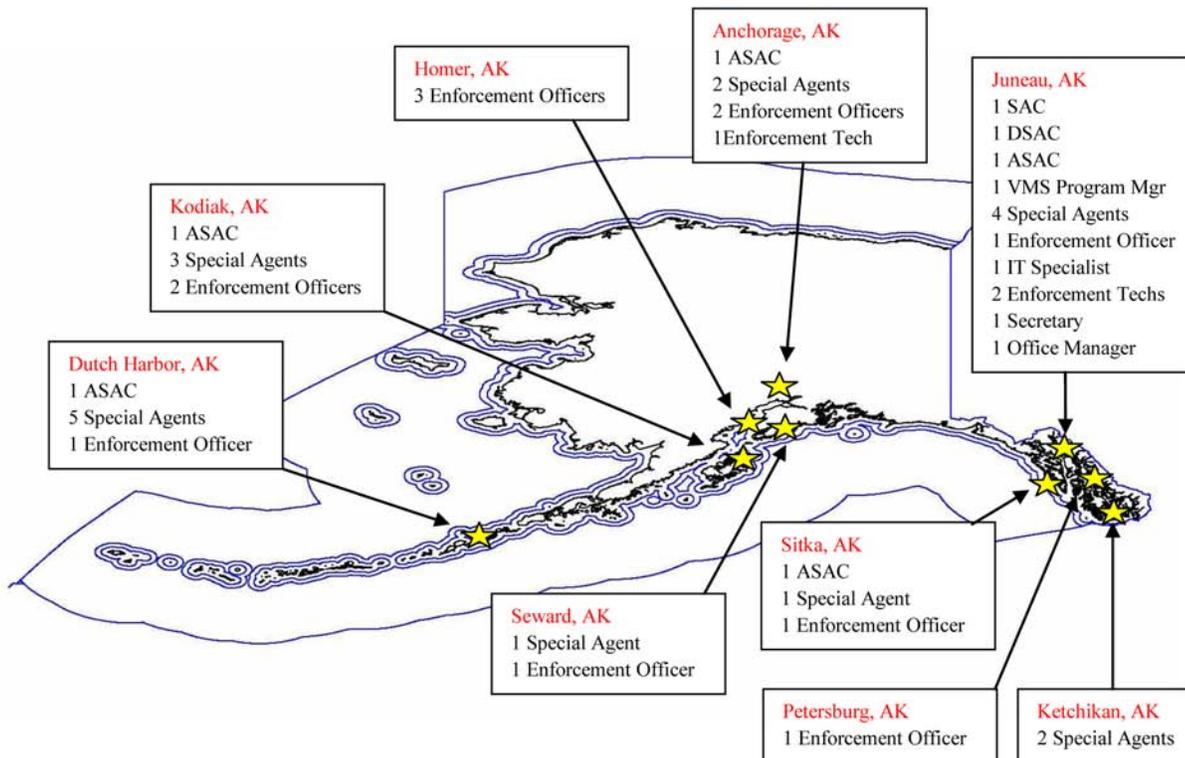
Selected Baseline Staffing Levels

In February 2010, the AKD was comprised of forty four (44) full time employees (FTE) positions that were broken out as follows:

- Supervisory, eight (8)
 - One (1) SAC
 - One (1) DSAC
 - Five (5) ASACs
 - One (1) VMS/IT Program Manager
- Non-Supervisory, thirty six (36)
 - Eighteen (18) Special Agents
 - Twelve (12) Enforcement Officers
 - One (1) IT Specialist
 - One (1) JEA Program Analyst
 - One (1) Enforcement Technician
 - One (1) VMS Technician
 - One (1) Support Services Specialist
 - One (1) Secretary

| Duty Station | District | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|----------------------------|----------|-------------|-----------------|-----------|-----------|----------|-----------|
| Juneau | Five | 3 | 1 | 4 | 1 | 5 | 14 |
| Sitka | Four | 1 | 0 | 1 | 1 | 0 | 3 |
| Petersburg | Four | 0 | 0 | 0 | 1 | 0 | 1 |
| Ketchikan | Four | 0 | 0 | 2 | 0 | 0 | 2 |
| Seward | Three | 0 | 0 | 1 | 1 | 0 | 2 |
| Homer | Three | 0 | 0 | 0 | 3 | 0 | 3 |
| Anchorage | Three | 1 | 0 | 2 | 2 | 1 | 6 |
| Anchorage/ Dutch Harbor | Two | 1 | 0 | 5 | 1 | 0 | 7 |
| Kodiak | One | 1 | 0 | 3 | 2 | 0 | 6 |
| 2010 Totals | | 7 | 1 | 18 | 12 | 6 | 44 |

ALASKA DIVISION 2010 STAFFING



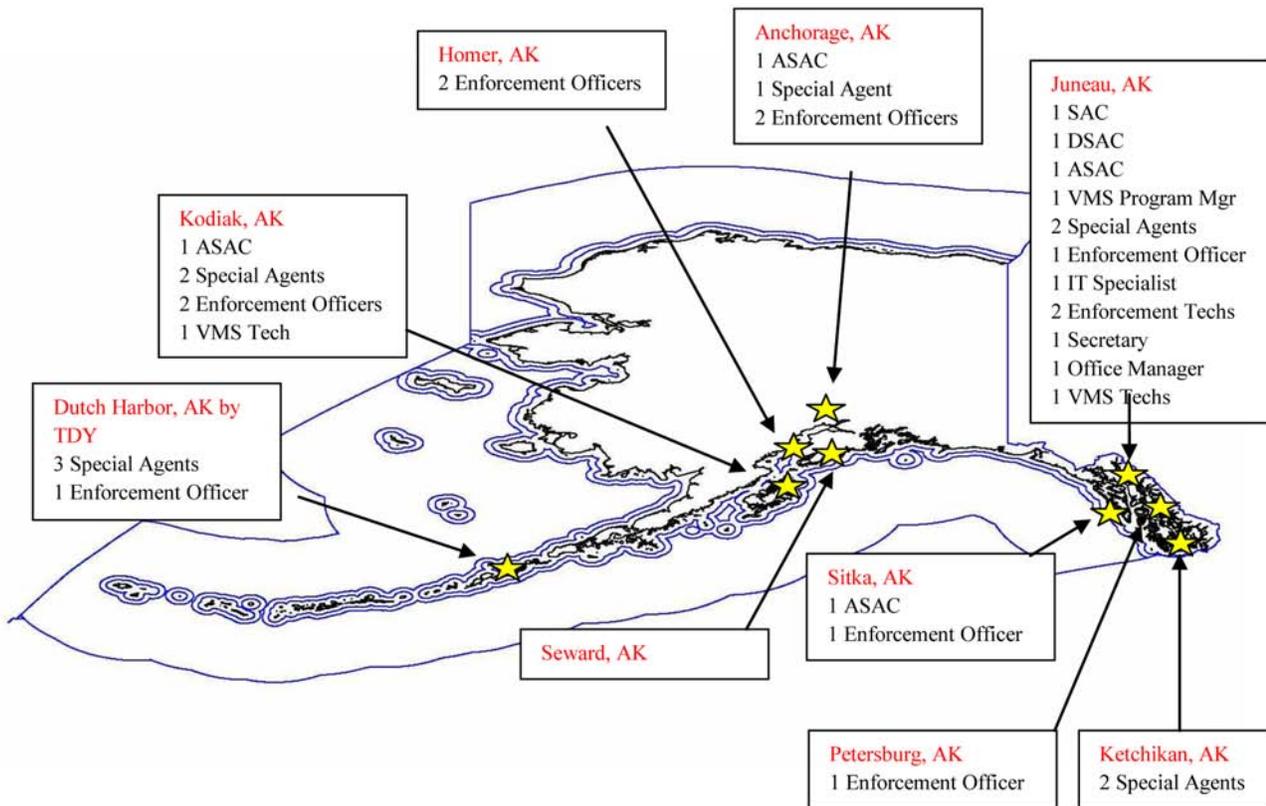
Current Staffing Level

As of January 2012, the AKD is comprised of thirty four (34) FTE positions broken out as follows:

- Supervisory, seven (7)
 - One (1) SAC
 - One (1) DSAC
 - Four (4) ASACs
 - One (1) VMS/IT Program Manager
- Non-Supervisory, twenty seven (27)
 - Ten (10) Special Agents
 - ten (10) Enforcement Officers
 - One (1) IT Specialist
 - Two (2) Enforcement Technicians
 - Two (2) VMS Technicians
 - One (1) Support Services Specialist
 - One (1) Secretary

| Duty Station | District | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|----------------------------|----------|-------------|-----------------|-----------|-----------|----------|-----------|
| Juneau | Five | 3 | 1 | 2 | 1 | 6 | 13 |
| Sitka | Four | 1 | 0 | 0 | 1 | 0 | 2 |
| Petersburg | Four | 0 | 0 | 0 | 1 | 0 | 1 |
| Ketchikan | Four | 0 | 0 | 2 | 0 | 0 | 2 |
| Seward | Three | 0 | 0 | 0 | 0 | 0 | 0 |
| Homer | Three | 0 | 0 | 0 | 2 | 0 | 2 |
| Anchorage | Three | 1 | 0 | 1 | 2 | 0 | 4 |
| Anchorage/ Dutch Harbor | Two | 0 | 0 | 3 | 1 | 0 | 4 |
| Kodiak | One | 1 | 0 | 2 | 2 | 1 | 6 |
| 2012 Totals | | 6 | 1 | 10 | 10 | 7 | 34 |

ALASKA DIVISION 2012 STAFFING



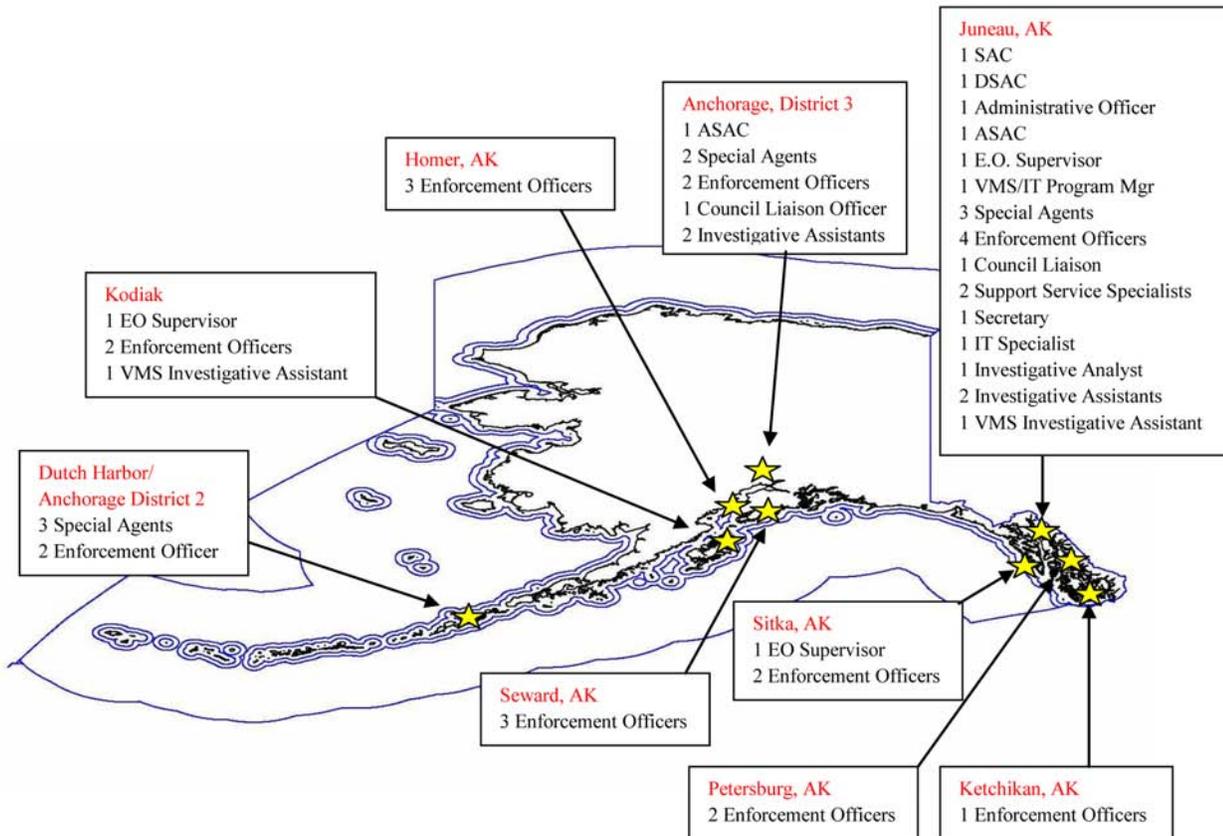
Proposed Future Staffing Levels

The long-term proposed staffing for the AKD would be comprised of fifty (50) FTE positions broken out as follows:

- Supervisory, nine (9)
 - One (1) SAC
 - One (1) DSAC
 - One (1) Administrative Officer
 - Two (2) ASACs
 - Three (3) Enforcement Officer Supv.
 - One (1) VMS/IT Program Manager
- Non-Supervisory, forty one (41)
 - Eight (8) Special Agents
 - Two (2) Council Liaison Officers
 - Twenty (20) Enforcement Officers
 - One (1) IT Specialist
 - Four (4) Investigative Assistant
 - Two (2) VMS Investigative Assistant
 - One (1) Investigative Analysts
 - Two (2) Support Services Specialist
 - One (1) Secretary

| Duty Station | District | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|----------------------------|-----------------|--------------------|------------------------|---------------|-----------------|---------------|--------------|
| Juneau | Five | 4 | 2 | 3 | 3 | 8 | 20 |
| Sitka | Four | 1 | 0 | 0 | 2 | 0 | 3 |
| Petersburg | Four | 0 | 0 | 0 | 2 | 0 | 2 |
| Ketchikan | Four | 0 | 0 | 0 | 1 | 0 | 1 |
| Seward | Three | 0 | 0 | 0 | 3 | 0 | 3 |
| Homer | Three | 0 | 0 | 0 | 3 | 0 | 3 |
| Anchorage | Three | 1 | 0 | 2 | 3 | 2 | 8 |
| Anchorage/ Dutch Harbor | Two | 0 | 0 | 3 | 2 | 0 | 5 |
| Kodiak | One | 1 | 0 | 0 | 2 | 1 | 4 |
| Future Totals | | 7 | 2 | 8 | 22 | 11 | 50 |

ALASKA DIVISION PROPOSED FUTURE STAFFING



Pacific Islands Enforcement Division

The Pacific Islands Division (PID) provides enforcement and compliance assistance for NOAA throughout the Main Hawaiian Islands and the Western, and Central Pacific. The Division encompasses the state of Hawaii, the territories of Guam and American Samoa, and the Commonwealth of Northern Mariana Islands. The area of operations compasses a region that is the size of three (3) of the United States of America's main-lands joined together. The PID works direct with and provides enforcement services for NOAA Fisheries' Regional Office and Science Center; National Ocean Service offices that oversees two (2) sanctuaries and four (4) Monuments.

PID is charged with an array of domestic and international enforcement missions throughout the Western and Central Pacific, and Asia found under the Magnuson Act; ESA; MMPA; Titles 16 & 18 of the U.S. Codes; Lacey Act; NOAA rules and regulations established, via the FAR; the South Pacific Tuna Treaty (SPTT); and acts implemented by the Secretary of Commerce because of the U.S. membership in the Western and Central Pacific Fishing Commission (WCFPC).

Staffing Comparison Summary

Selected Baseline Staffing Levels

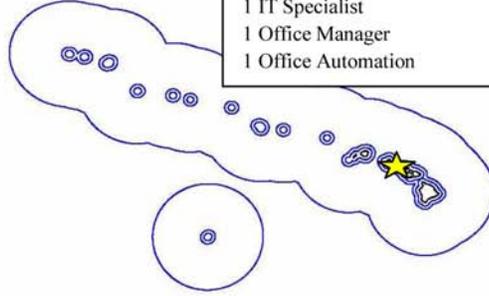
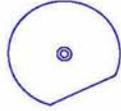
In February 2010, the PID was comprised of nineteen (19) full time employees (FTE) positions that were broken out as follows:

- Supervisory, five (5)
 - One (1) SAC
 - One (1) DSAC
 - Two (2) ASACs
 - One (1) VMS/IT Program Manager
- Non-Supervisory, fourteen (14)
 - Six (6) Special Agents
 - Two (2) Enforcement Officers
 - Three (3) Enforcement Technicians
 - One (1) IT Specialist
 - One (1) Office Manager
 - One (1) Office Automation

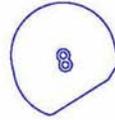
| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|--------------------|-------------|-----------------|----------|----------|----------|-----------|
| Hawaii | 4 | 1 | 4 | 1 | 6 | 16 |
| American Samoa | 0 | 0 | 1 | 1 | 0 | 2 |
| Guam | 0 | 0 | 1 | 0 | 0 | 1 |
| 2010 Totals | 4 | 1 | 6 | 2 | 6 | 19 |



Guam
1 Special Agent



Honolulu, HI
1 SAC
1 DSAC
2 ASAC
1 VMS Program Manager
4 Special Agents
1 Enforcement Officer
3 Enforcement Techs
1 IT Specialist
1 Office Manager
1 Office Automation



American Samoa
1 Special Agent
1 Enforcement Officer

Current Staffing Level

As of January 2012, the PID is comprised of twenty (20) FTE positions broken out as follows:

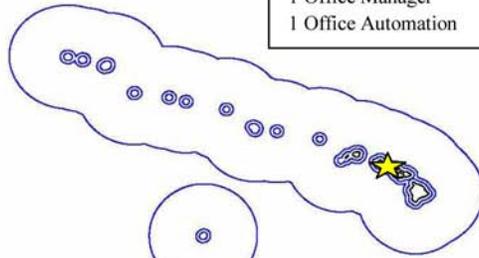
- Supervisory, four (4)
 - One (1) SAC
 - One (1) DSAC
 - One (1) ASAC
 - One (1) VMS/IT Program Manager
- Non-Supervisory, sixteen (16)
 - Six (6) Special Agents
 - Two (2) Enforcement Officers
 - Three (3) VMS Technicians
 - One (1) JEA Technician
 - One (1) Enforcement Technician
 - One (1) IT Specialist
 - One (1) Office Manager
 - One (1) Office Automation

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|---------------------|--------------------|------------------------|---------------|-----------------|---------------|--------------|
| Hawaii | 3 | 1 | 4 | 1 | 8 | 17 |
| American Samoa | 0 | 0 | 1 | 1 | 0 | 2 |
| Guam | 0 | 0 | 1 | 0 | 0 | 1 |
| 2012 Totals | 3 | 1 | 6 | 2 | 8 | 20 |

PACIFIC ISLANDS DIVISION 2012 STAFFING



Guam
1 Special Agent



Honolulu, HI
1 SAC
1 DSAC
1 ASAC
1 VMS Program Manager
4 Special Agents
1 Enforcement Officer
3 VMS Technicians
1 JEA Technician
1 Enforcement Technician
1 IT Specialist
1 Office Manager
1 Office Automation



American Samoa
1 Special Agent
1 Enforcement Officer

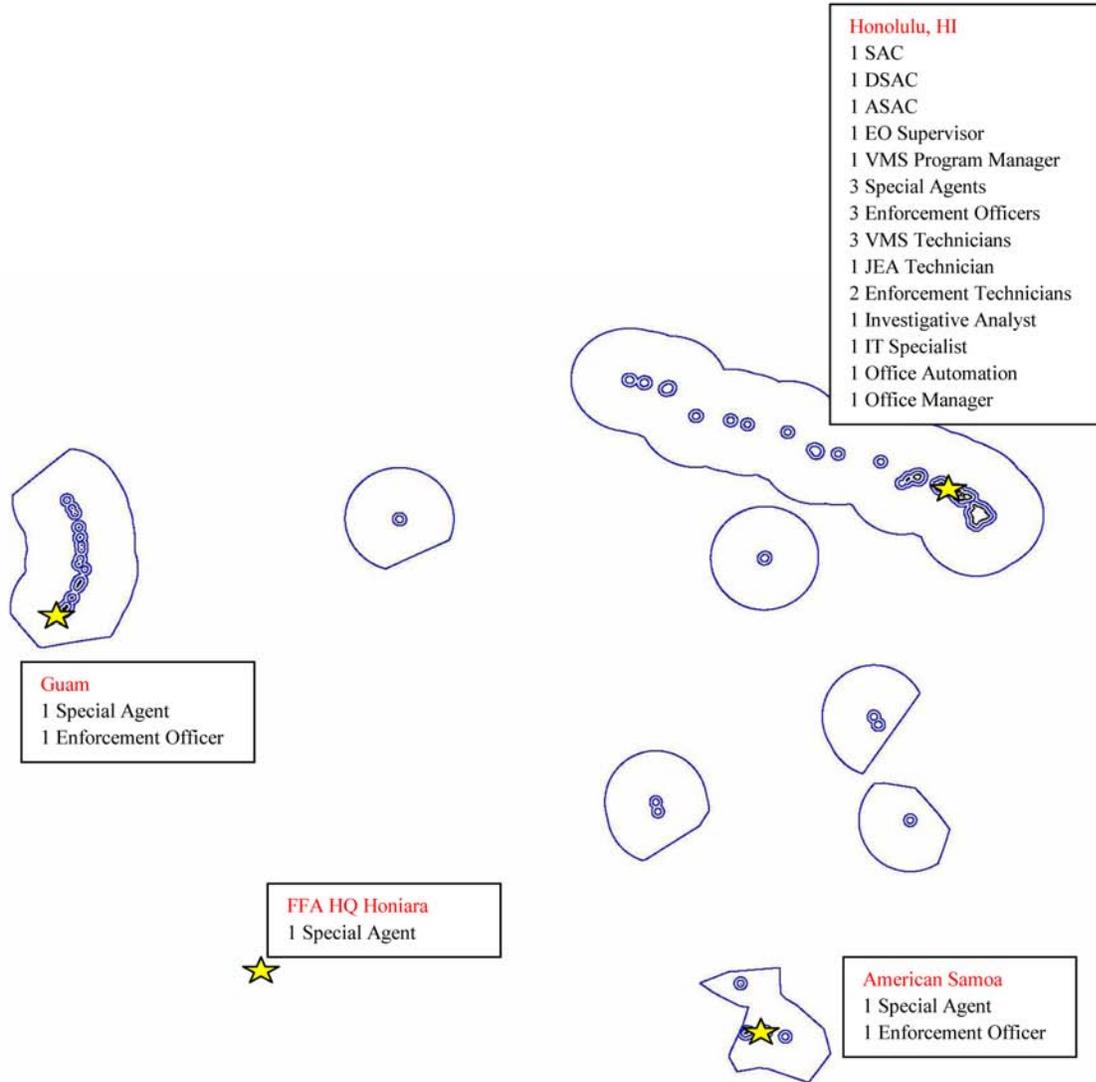
Proposed Future Staffing Levels

The long-term proposed staffing for the PID would be comprised of twenty six (26) FTE positions broken out as follows:

- Supervisory, Five (5)
 - One (1) SAC
 - One (1) DSAC
 - One (1) ASACs
 - One (1) Enforcement Officer Supv.
 - One (1) VMS/IT Program Manager
- Non-Supervisory, twenty one (21)
 - Six (6) Special Agents
 - Five (5) Enforcement Officers
 - Three (3) VMS Technicians
 - One (1) JEA Technician
 - Two (2) Enforcement Technicians
 - One (1) Investigative Analyst
 - One (1) IT Specialist
 - One (1) Office Automation
 - One (1) Office Manager

| Duty Station | Sworn Supv. | Non-Sworn Supv. | Agents | Officers | Admin. | Total |
|----------------------|--------------------|------------------------|---------------|-----------------|---------------|--------------|
| Hawaii | 4 | 1 | 3 | 3 | 10 | 21 |
| American Samoa | 0 | 0 | 1 | 1 | 0 | 2 |
| Guam | 0 | 0 | 1 | 1 | 0 | 2 |
| FFA HQ Honiara | 0 | 0 | 1 | 0 | 0 | 1 |
| Future Totals | 4 | 1 | 6 | 5 | 10 | 26 |

PACIFIC ISLANDS DIVISION PROPOSED FUTURE STAFFING



Appendix C
Table 1. National Plan

NOAA Office of Law Enforcement
Staffing Deployment Plan
March 2012

| OPM Series Titles | Criminal Investigation | General Inspection, Enforcement, Investigation, and Compliance | Investigative Analysis | Miscellaneous Administration and Program | Administrative Officer (supv) | HQ Assistant Director Support Services (supv) | Support Services Administration | Management and Program Analysis | Information Technology (IT) Management | Compliance Inspection and Support | Secretary | Office Automation and Assistance | Financial Management Specialist | Budget Analyst | Outreach Specialist | | | |
|-------------------|------------------------|--|------------------------|--|-------------------------------|---|---------------------------------|---------------------------------|--|-----------------------------------|-----------|----------------------------------|---------------------------------|----------------|---------------------|---------|---------|---------|
| OPM Series | ZA-1811 (Supv) | ZA-1811 | ZA-1801 (Supv) | ZA-1801 | ZA-1805 | ZA-0301 | TBD | ZA-0341 | ZA-0342 | ZA-0343 (Supv) | ZA-0343 | ZP-2210 | ZS-1802 | ZS-0318 | ZA-0326 | ZA-0501 | ZA-0560 | ZA-1001 |

Total FTEs in These Series

| | | | | | | | | | | | | | | | | | | |
|-----------------|-----|----|-----|----|----|---|---|---|---|---|----|----|----|----|---|---|---|---|
| February 2010 | 233 | 40 | 107 | 0 | 18 | 0 | 0 | 0 | 3 | 5 | 16 | 16 | 20 | 3 | 5 | 0 | 0 | 0 |
| January 2012 | 210 | 30 | 84 | 1 | 21 | 0 | 1 | 0 | 3 | 5 | 11 | 13 | 29 | 2 | 6 | 2 | 1 | 0 |
| Proposed 2013 | 231 | 28 | 82 | 5 | 31 | 0 | 1 | 4 | 3 | 5 | 11 | 16 | 33 | 2 | 6 | 2 | 1 | 0 |
| Proposed Future | 308 | 23 | 50 | 17 | 99 | 7 | 5 | 6 | 1 | 9 | 5 | 13 | 16 | 44 | 2 | 7 | 2 | 1 |

**This table illustrates the breakout by OPM series for the proposed future field staffing - series that were present in the past, which not proposed in the future, have not included.

OVERVIEW OF KEY PROPOSED CHANGES:

- * One (1) DSAC in each Division will be replaced with an Administrative Officer. This change will align Division structure with the new structure at HQ.
- * Decrease in 1811 series Agents, and Increase in 1801 series Officers & Administrative Personnel (Including increasing 0343 series Technicians as well as incorporating new 1805 series Investigative Analysts)

| | Total | Total 1811 | Total 1801 | Total Invest./Enf. Support* | Total Admin. Support* |
|-----------------|-------|------------|------------|-----------------------------|-----------------------|
| 2010 | 234 | 147 | 18 | 20 | 49 |
| 2012 | 212 | 114 | 22 | 29 | 47 |
| Proposed 2013 | 231 | 110 | 36 | 33 | 52 |
| Proposed Future | 308 | 73 | 116 | 51 | 68 |

*Total Investigative/Enforcement Support includes 1805, and 1802 series

*Total Administrative Support includes all other series

| Total Invest/Enf Personnel | Ratio 1811s to 1801s | to Invest/Enf Support |
|----------------------------|----------------------|-----------------------|
| 2010 | 185 | 79% |
| 2012 | 165 | 69% |
| Proposed 2013 | 179 | 61% |
| Proposed Future | 240 | 30% |

| Total Personnel | Ratio 1811s to 1801s | to Invest/Enf to Admin. |
|-----------------|----------------------|-------------------------|
| 2010 | 234 | 63% |
| 2012 | 212 | 54% |
| Proposed 2013 | 231 | 48% |
| Proposed Future | 308 | 24% |

NOAA's Office of Law Enforcement Workforce Analysis & Staffing Allocation Plan May 2012

U.S. Secretary of Commerce

John E. Bryson

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