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UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL MARINE FISHERIES SERVICE
NORTHEAST REGION
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Dear Tom and Chris:

As noted in our recent email, we recommend adjusting the schedule for the Omnibus Industry-funded Monitoring Amendment for the following reasons:

- From the feedback we received at the January New England and February Mid-Atlantic Council meetings, members of the public and the Councils would like more opportunity to provide input and consider the implications of this action. We agree that more public and Council input would produce a better result. We have been brainstorming with your staffs how to best address these concerns, but have found that the current timeline does not easily accommodate additional meetings.
- In addition, we have been evaluating our other commitments to support other high priority Council actions and initiatives and think a modified timeline would ensure a better product for the Councils.
- We would also like to revise the timeline to allow us the opportunity to provide both Councils with a presentation on our budget process for monitoring programs at your April meetings. If you can provide us time on your agendas, we hope this information will answer many of the recurring questions about how monitoring programs are funded.

The modified schedule in Table 1 would allow more time for the necessary input and development leading up to adoption of draft alternatives at the August/September meetings. Please let us know if you think this timeline would adequately accommodate Council and public input.

Table 1: Proposed Timeline

Action	Current Timeline	Proposed Timeline
Councils initiate amendment	September/October 2013	September/October 2013
First PDT/FMAT meeting	December 2013	December 2013
Second PDT/FMAT meeting	January 2014	January 2014
Councils approve draft range of alternatives to be developed	January/February 2014	January/February 2014
PDT/FMAT/Councils develop alternatives, draft EA	February-April 2014	February-August 2014
Councils approve draft EA for public review	April 2014	August/September 2014
30-day public comment period on draft amendment	May 2014	October 2014
Councils take final action	June 2014	November/December 2014
EA finalized, proposed rule drafted	July 2014	January 2015
Proposed rule publishes with 30 day comment period	September 2014	March 2015
Comment period ends, final rule drafted	October 2014	April 2015
Final rule publishes	November 2014	May 2015
Final rule effective	January 2015	June 2015

To address the Councils' and public's desire for additional opportunities for input, we have come up with a few ideas:

- The New England Council has formed an ad-hoc Observer Advisory Committee, which we presume would provide another opportunity for Council members and the public to provide input on this action, though it is not clear yet when this Committee will meet. We suggest that the Councils consider making this a joint Council body to allow for more holistic advice representative of the full picture of monitoring needs in the region.
- The Councils could convene a joint ad-hoc Advisory Panel (AP), using members of existing APs from affected fisheries, and/or other members of the public. This AP could then provide input to the Councils and the New England Council's Observer Advisory Committee with respect to this action. To save on meeting costs, we could host a virtual AP meeting for the Councils' joint AP to provide input on the action. We think it would be important to have at least 2 meetings of such an AP before the Councils adopt the draft Amendment.
- NMFS staff could host evening public info sessions in conjunction with the August/September Council meetings in the proposed timeline. We could also host additional webinar info sessions for those members of the public that could not attend the meetings in person.

In addition to the above ideas, the PDT/FMAT is planning to host in-person meetings, as well as conference calls, to accommodate members of the public that prefer attending in person. We would appreciate your feedback on these ideas and any other ideas you may have to address the Councils' and public's concerns. If it would be more convenient, we would be happy to set up a conference call to discuss these ideas in more depth.

This action would address a long-standing issue about how to fund increased monitoring requirements and continues to be a priority for NMFS. We appreciate the Councils' willingness to engage this difficult topic and look forward to continuing our collaboration.

Sincerely,

John K. Bullard
Regional Administrator
Greater Atlantic Region

William A. Karp, Ph.D.
Science and Research Director
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