



New England Fishery Management Council

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E.F. "Terry" Stockwell III, *Chairman* | Thomas A. Nies, *Executive Director*

February 27, 2015

Mr. John Bullard
Northeast Regional Administrator
NMFS, Greater Atlantic Regional Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930

RE: Comments on Draft Environmental Assessment for the Omnibus Industry-Funded Monitoring (IFM) Amendment

Dear John:

At its January 28-29, 2015 meeting, the New England Fishery Management Council reviewed the Draft Environmental Assessment (EA) for the omnibus Industry-Funded Monitoring (IFM) amendment and unanimously agreed that the document needs further development and additional analysis prior to approval by the New England Council for public comment. The Council also identified the following specific issues to address in the draft document:

- Expansion of the discussion of economic impacts – address/groundtruth fixed and operating costs for herring/mackerel vessels
- Expansion of the discussion of impacts on the Atlantic herring and mackerel fleets
- Information and analysis to support the implementation of a portside sampling program and/or EM program to be implemented through a framework adjustment (relative government costs/industry costs, comparison to at-sea costs)
- Costs differences between at-sea monitors versus observers
- Expansion of impacts of herring and mackerel options on other fisheries (groundfish stocks)
- Impacts of current observer coverage requirements for midwater trawl vessels in the groundfish closed areas

As the IFM FMAT works to address the issues identified above, my staff will continue to work with your staff regarding other revisions to the document that are necessary. Thank you for your attention to this matter. Please contact me with any further questions or concerns.

Sincerely,

Thomas A. Nies
Executive Director

cc: Council members