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July 20, 1977

Mr. Spencer Apollonio
Executive Director
New England Regional Fishery Management Council
Peabody Office Building
One Newbury Street
Peabody, Massachusetts 01960

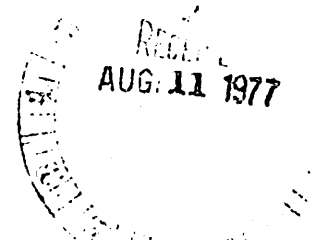
Dear Spencer:

Thank you for your letter of July 14, 1977, concerning the so called "Events Schedule" devised by NOAA. I have seen earlier versions of this chart and believe it a classic example of the bureaucracy at work. None of us who were involved in the drafting of the FCMA imagined that we were creating such a monster and I still do not believe that we in fact did.

The complexity of the "Events Schedule" and the protracted delays are not the result of the procedures of the FCMA but are rather in my opinion the result of engrafting a multiplicity of other statutes together with their own processes onto the FCMA.

I would be pleased to work with your Council to simplify and shorten the steps required for the development of Fishery Management Plans. As one of the staff draftsmen of this legislation, I believe I am qualified to undertake such an effort on behalf of the Council.

This undertaking will entail consultation with my former colleagues of the House Merchant Marine & Senate Commerce Committees, key members of Congress, NOAA-NMFS, CEQ and other agencies with a peripheral interest such as Interior and Corp. of Engineers. Following such consultations I will personally determine and verify the statutory and/or regulatory authority and/or justification for each step and identify those steps which may have a questionable basis in law or regulation. I will also attempt to identify those steps which the Council may be able to shorten or eliminate. To the extent that certain steps may be beyond the Council's power to alter or eliminate, I will recommend appropriate administrative and/or legislative courses of action.



Mr. Spencer Apollonio

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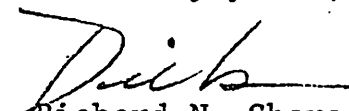
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In all candor, I cannot give you any prognosis as to how much of the "Events Schedule" can be eliminated or shortened. If it is not possible to streamline these procedures, all of the Councils will be hamstrung in their efforts to assume responsibility. In the meantime, of course, NOAA's PMP's continue to govern the majority of fisheries. If I were a cynic, I might suggest that this has been done with malice aforethought.

I believe that we should enter into a written contract and for this purpose it might be better to get together in person to discuss my fee and other relevant details.

I will give you a call this coming Friday to see if we can get together next week either here or at your office.

Sincerely yours,


Richard N. Sharood

RNS:bc