



## New England Fishery Management Council

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### MEMORANDUM

**DATE:** November 5, 2014  
**TO:** Groundfish Oversight Committee (Committee)  
**FROM:** Groundfish Plan Development Team (PDT)  
**SUBJECT:** Progress on Amendment 18

At its September-October meeting, the Council tabled consideration of Amendment 18 until its November meeting. The primary focus of the PDT has since been the development and analysis of measures for Framework 53. The PDT has only briefly discussed Amendment 18, updating the Discussion Document to reflect the September Committee motions. The document, as revised November 5, will be sent to the Council on November 7. This memo provides PDT comment on a few issues.

#### **Amendment 18 Action Timeline**

The Amendment 18 Action Plan timeline has the Council approving the remaining Range of Alternatives for the DEIS at its November meeting. By accomplishing this in November, the PDT would be able to move forward with impacts analysis and preparation of the Draft Environmental Impact Statement. This timing would fit well with other PDT work anticipated over the next few months.

*PDT Recommendation: That the remaining Range of Alternatives be approved at the November Council meeting.*

#### **Inshore/Offshore Gulf of Maine (Section 4.5)**

In September 2014, the Committee voted to add a catch reporting provision to Section 4.5.2 Alternative 2: Establish Inshore/Offshore GOM Cod sub-ACLs. The provision would require that, for both commercial and recreational vessels, reporting measures would be established to accurately attribute catch to the inshore and offshore GOM areas. More specific guidance was not provided.

For the commercial vessels, existing reporting mechanisms could be used with modifications. Vessel Trip Reports (VTRs) cannot be used alone. An additional catch data stream would need to be developed to identify which sub-ACL to charge. This is not an insurmountable challenge.

The PDT has more concerns about the feasibility of applying this provision to recreational vessels, given current challenges with monitoring the party/charter and private angler fleets and constraining catch within catch limits. It would be very difficult to track recreational ACLs by sub-areas or enforce declaration time periods without substantial changes to the administration of the recreational fishery. Currently, all recreational vessels do not have to declare a trip or carry observers. Party-charter vessels are required to submit VTRs, but the private anglers are not. The PDT would need additional guidance to develop measures. For example: all anglers should be registered with a saltwater fishing license, but if there is more than one angler fishing on a given trip, who would be responsible for reporting? Refer to the PDT memos of July 30 and September 5 for additional discussion.

The PDT feels that improving the quality of the recreational fishery data would be beneficial. Given other immediate work priorities (e.g., submitting Framework 52, preparing for final action on Framework 53), the PDT has not had time to develop specific measures. It may be better to consider recreational catch monitoring measures that would apply to the entire recreational fishery, not just for GOM cod sub-ACL monitoring. It would be more appropriate to develop these measures through a separate action, given the Amendment 18 scope, goals, and timeline.

*PDT Recommendation: Do not include the recreational fleet in the catch reporting provision for the GOM cod sub-ACL measures. Consider recreational catch reporting measures through a separate action.*

#### **Redfish Exemption Area (Section 4.6)**

Per a September Committee motion, the PDT has created Section 4.6 that includes an alternative that would establish a Redfish Exemption Area. This alternative is very similar to a FY2015 sector exemption request that the Greater Atlantic Regional Office is currently considering, with the additions that the alternative would allow the common pool to use the Area and has a 100% observer requirement.

The PDT is somewhat concerned that similar (yet different) measures would be considered simultaneously through two separate approaches, a sector exemption and a Council action. This could lead to confusion by industry members and managers, as well as additional complications. This also results in duplication of the human resources involved in pursuing both approaches.

This alternative has the potential to create new strata for observer coverage during a time when there are less available funds for observers. If fishing under the redfish exemption becomes desirable, many observed trips could be diverted from regular groundfish trips. This could reduce observer coverage below necessary levels to achieve required CVs, making the sea-sampling of the fleet less random. Perhaps the system could be setup such that fishermen have to decide if they plan to conduct a redfish trip before they know if they would carry an observer.

*PDT Recommendation: Clarify which approach should be used to develop this concept, through a sector exemption or Council action. Clarify how this measure should be developed to promote the statistical validity of the observer data.*