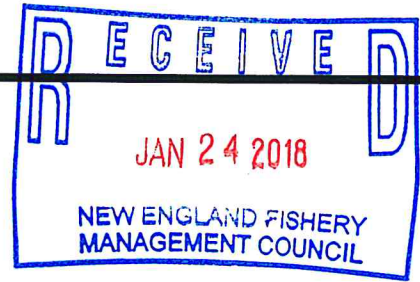


ADDITIONAL
CORRESPONDENCE

Sherie Goutier

From: John Haran <john.haran@comcast.net>
Sent: Wednesday, January 24, 2018 7:37 AM
To: comments
Subject: monitoring



It's amazing, the Council and NOAA keep pushing for monitoring when both agencies know that the industry cannot afford it.

Electronic monitoring is not the answer; the Government paying for monitoring thru action by Congress is the answer.

How can you continue down this road knowing this will continue to consolidate the fleet and shrink shore side services.

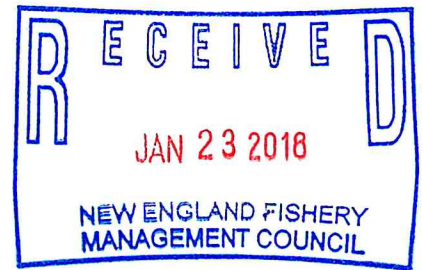
No one seems to care about the economic impact this will have on families and fishing communities.

This will kill our small boat fleet; New Hampshire only has six boats left.

The cost of electronic monitoring will be as expensive as the present system.

John Haran Sector 10 & 13

jc 1/25/18



Stellwagen Bank Charter Boat Association
P.O. BOX 1230
Marshfield, MA 02050

Mr. Michael Pentony,
Greater Atlantic Region Fisheries Office
55 Great Republic Drive
Gloucester, MA 01930

Jan, 22, 2018

“Clarification of Charter Headboat EVTR Requirements”

Dear Mr. Petoney,

I am writing to you on behalf of the Stellwagen Bank Charter Boat Association which represents dozens of charter and party permit holders who hold permits for Atlantic Bluefish, Black Sea Bass, Scup, Summer Flounder, Tilefish, Squid, Mackerel, and or Butterfish. September 2017 the Mid-Atlantic Fishery Management Council approved these permit holders to submit by electronic means all vessel trip reports within 48 hours. We understand the purpose of this was to increase the accuracy of recreational landings. When this proposal was proposed permit holders in the northeast had very little knowledge due to it being submitted by the Mid-Atlantic Council.

Now these reporting requirements are mandatory starting March 2018 we have a few concerns. I myself was part of a pilot program beta test by the Commonwealth of Massachusetts Division of Marine Fisheries this past season. I fish an open 23' center console with no mate and found it impossible to fill out the information underway while trying to bait hooks, land fish, measure for compliance and run back up on the drift. Speaking to other captains about this they had the same concerns even while running party boats.

In the FAQ section of the EVTR's it states *“You must submit your VTR electronically, but if you do not have a suitable device onboard your vessel, you may record the information on a paper VTR and transcribe it onto an eVTR when you are in port. You must submit the eVTR no more than 48 hrs after entering port at the conclusion of each trip”*.

I believe the purpose of this program is to allow NMFS to obtain better landings and discards from these vessels and not to hinder the operation of the vessels underway or create a safety issue. The requirement for a vessel to have a VTR filled out before landing at the dock is easier to comply with if running a large fishing vessel compared to a smaller charter vessel. I am respectfully requesting clarification of when VTRS must be filled out and the forms to use.

Can a vessel fill the required VTR information out when they return to the dock as long as they have recorded the information required? Also instead of carrying the multi form VTR's issued by NMFS can just a single copy be used to record the data prior to entering electronically. To me this makes sense if no colored copies are being sent to either GARFO or the State Division of Marine Fisheries. If we can meet these requirements for HMS species, why not allow it for Mid-Atlantic managed species?

jc 1/24/18

In summary, please clarify the requirements of what information has to be completed prior to entering port taking safety into consideration and please explain the value added if the service would be receiving the information within forty eight hours electronically? Also, please confirm if a blank white copy of a VTR to be filled out will be accepted especially if boarded at the dock by a NOAA agent or a surveyor knowing the information will be submitted electronically. By allowing white paper copies, it will be easier for the vessel owner and operators to comply but also save NMFS funds, not having to print and mail VTR log books to permit holders.

If you have any questions, please feel free to contact me anytime.

Respectfully,

David Waldrip
Stellwagen Bank Charter Boat Association

cc: Frank Blount, Chairman, RAP
Moiria Kelly, GARFO
Dr. David Pierce, MA DMF
Dr. Jamie Cournane, NEFMC
Mr. Barry Gibson, Vice Chair, RAP
Mr. Michael Pierdinock, MA MFC



Greater Atlantic Region Bulletin

NOAA Fisheries, Greater Atlantic Regional Fisheries Office, 55 Great Republic Drive, Gloucester, MA 01930

For Information Contact:
Sustainable Fisheries Division
(978) 281-9315

<http://www.greateratlantic.fisheries.noaa.gov/>

Date Issued 9/11/2017

Mid-Atlantic Species Charter and Party Vessels
Electronic Vessel Trip Reports Required for all Mid-Atlantic
Charter and Party Trips
Effective Date: March 12, 2018

We have approved a new framework that changes reporting requirements for the Mid-Atlantic charter and party fleet. If you have a Federal charter or party permit for species managed by a Mid-Atlantic Fishery Management Council FMP and are on a trip carrying passengers for hire, you must:

- Submit eVTRs by electronic means through a NOAA-approved software application (see question and answer below for more information).
- Submit eVTRs within 48 hours following the completion of a fishing trip.

Vessels with Federal charter or party permits for any of the following species will be bound by this rule:

- | | |
|---------------------|------------------|
| • Atlantic mackerel | • Scup |
| • Squid | • Black sea bass |
| • Butterfish | • Bluefish |
| • Summer Flounder | • Tilefish |

Frequently Asked Questions

Q. When will this regulation take effect?

A. This action will take effect on March 12, 2018. All vessel must submit eVTRs in compliance with these regulations for any trips taken on or after this date. We are delaying implementation to provide vessel owners and operators time to obtain the software application and necessary training to comply with this regulation. Although we are providing details now on the new requirements, we will provide additional information and reminders closer to March 12, 2018.

Q. Do eVTRs need to be completed prior to entering port?

A. Yes. The requirement to complete VTRs before returning to port will not change with this action.

Q. How can I submit my eVTRs? Where can I find out about NOAA-approved eVTR software applications?

A. These reports can be submitted through handheld electronic devices (i.e. phone, tablet) or through an online webportal on a personal computer. There are free and pay options for any submittal method that you choose. These choices are detailed in the table below:

If your vessel has the following: →	Tablet/SmartPhone		Personal Computer	
	Free	Pay	Free	Pay
	1. eTrips	1. eLog	1. eTrips	1. eLog
		2. Olrac/ Dynamic Data Logger	2. FLDRS	2. Olrac/ Dynamic Data Logger
		3. FACTS		3. FACTS

The GARFO website includes details and about these NOAA-approved eVTR software applications and contacts/support for eVTR problems. They can be found at this link: <https://www.greateratlantic.fisheries.noaa.gov/aps/evtr/electronic/index.html>.

Q. What if I don't have an electronic device onboard my vessel that enables me to submit an eVTR at sea?

A: You must submit your VTR electronically, but if you do not have a suitable device onboard your vessel, you may record the information on a paper VTR and transcribe it onto an eVTR when you are in port. You must submit the eVTR no more than 48 hrs after entering port at the conclusion of each trip.

Q. I don't know how to do eVTRs. What can I do to get training I need to complete and submit eVTRs?

A. NMFS, the Council, and approved contractors will work with vessel operators to provide training sessions on eVTR use and requirements. In addition, approved contractors provide online and/or in-person training on the use of their eVTR systems. The GARFO eVTR webpage (address above) lists contact information for eVTR contractors who can provide information on training for the approved software packages. In addition, the Council eVTR webpage (<http://www.mafmc.org/actions/evtr-framework>) maintains a schedule of meetings and trainings related to this action, as well as background documents that you may find helpful.

Q. Why is NOAA Fisheries making these changes?

A. The Mid-Atlantic Fishery Management Council and NOAA Fisheries are working to reduce the reporting burden on fishermen while improving data collection procedures in order to obtain data that is more timely, accurate, and useful. The time delays and inaccuracies associated with current data collection in the charter and party fishing fleets reduce our ability to

use the data in making management decisions. This action is intended to improve this data collection and improve the utility of the data.

Q. How will these changes benefit fishermen?

A. While there may be a minor and temporary increase in reporting burden as permit holders transition to electronic submission, the long-term burden will be reduced for reasons including the following:

- eVTRs can be preconfigured with data fields filled in;
- eVTRs provide a means for creating multiple reports (which are often necessary due to areas/species fished, etc.);
- eVTRs provide a convenient manner of mandatory storage; and
- eVTRs eliminates the costs/effort associated with mailing paper forms.

Q. If I have a Federal charter or party permit for a Mid-Atlantic species, but I am fishing on a commercial trip without taking passengers for hire, am I still obligated to submit an eVTR?

A. No. When not on a trip carrying passengers for hire, you may submit an eVTR or a paper form submitted by mail.



New England Fishery Management Council

50 WATER STREET | NEWBURYPORT, MASSACHUSETTS 01950 | PHONE 978 465 0492 | FAX 978 465 3116
John F. Quinn, J.D., Ph.D., Chairman | Thomas A. Nies, *Executive Director*

January 22, 2018

Mr. Michael Pentony
Regional Administrator
Greater Atlantic Regional Fisheries Office
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930

Dear Mike:

Today, my staff electronically sent the preliminary submission of Framework Adjustment 57 (FW 57) to the Northeast Multispecies (Groundfish) Fishery Management Plan, including the Environmental Assessment, and associated Appendices (2 total) to your staff in the Sustainable Fisheries Division at the Greater Atlantic Regional Fisheries Office for review.

The measures proposed in FW 57 are intended to set specifications for all groundfish stocks, and adjust management measures for commercial and recreational fisheries that catch groundfish. FW 57 incorporates the results of the most recent peer reviewed stock assessments into the setting of specifications, including catch limits for the U.S./Canada Resource Sharing Understanding, and the distribution of annual catch limits (ACLs) to various components of the fishery. FW 57 would also modify the common pool trimester total allowable catches (TACs) and allow the Regional Administrator (RA) to adjust these TACs under certain conditions, modify Atlantic halibut management accountability measures (AMs), modify Southern windowpane flounder AMs for the large-mesh non-groundfish trawl fisheries (e.g., scup and summer flounder), temporarily modify the trigger for the Southern New England/Mid-Atlantic yellowtail flounder AMs for the scallop fishery, and allow the RA temporary authority to adjust recreational management measures for Georges Bank cod.

Please note that the following changes will be addressed prior to the formal submission of the action:

- Section 6.6.6: Fishing Communities - update the Affected Environment -using NEFSC/SSB's *2007-2015 Final Report on the Performance of the Northeast Multispecies Fishery*
- Section 8.11: Regulatory Impact Review- complete entire section
- Appendix II: Calculation of Northeast Multispecies Annual Catch Limits, FY2018 – FY2020 – complete entire appendix

The Council requests the measures proposed in this framework adjustment be implemented as expeditiously as possible.

Upon review of the Framework 57 document, please communicate any comments or need for further document revisions directly to me. Please contact me if you have questions.

Sincerely,

A handwritten signature in black ink that reads "Thomas A. Nies". The signature is written in a cursive style.

Thomas A. Nies
Executive Director

cc: Chris Moore, MAFMC