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From: Michael Pierdinock
Sent: Tuesday, June 07, 2016 8:38 AM
To: betsy.nicholson@noaa.gov; comment@neoceanplanning.org
Cc: Rich Ruais; Ralph Pratt; Raymond Bogan; Dave Waldrip; Barry Gibson; Charlie Wade; John Depersenaire; David Schalit; Beth Casoni; David Pierce; John Bullard; Tom Nies; Moira Kelly; Mark Grant; Brad McHale
Subject: Comments to Northeast ("NE") Ocean Plan

Betsy:

Thank you for your recent presentation at the SBNMS SAC meeting concerning the Northeast Ocean Plan and use of the Northeast Data Portal. Consistent with your email, the Northeast Data Portal and Northeast Ocean Plan focus primarily on recreational boating but the plan utilized data provided by the pilot project conducted by a select few charter boat captains from CT/RI/NY (<http://neoceanplanning.org/wp-content/uploads/2015/04/FactsheetPartyCharter.pdf>). My comments to the NE Ocean Plan is set forth below.

The level of detail found within the plan provided by the pilot project conducted by a select few charter boat captains transiting from home port to sea and back is concerning. NOAA and specifically GARFO understand that such detail is confidential and is not necessary to manage the fishery. For example, Northeast Federally Permitted charter boat or for hire vessels complete VTRs that provide the center point where fish were landed for the day (that does not include the latitude/longitude minutes and seconds) and the associated "chart area" designated by NOAA. NOAA only requires that level of detail to manage the fishery any more additional location data is confidential information that is not necessary to manage the fishery. GARFO has specifically indicated that proposed electronic VTR monitoring and reporting if required from their office in the future will only require that level of detail presently found on VTRs since they understand the confidential nature of such data.

Additional data could result in denying anglers access to the fishery that is inconsistent with the basic foundation of the laws of the United States that we are not to be denied access to the fishery. For example, it was not until recently that haddock was found at significant levels in the Stellwagen Bank waters. Haddock were rare to land 20 to 50 plus years ago in the Stellwagen area. If one was to conclude that we don't fish for haddock on Stellwagen Bank because none were present based on the last 40 to 50 years of data one could theoretically shut that area down to haddock fishing for some other use since it is assumed we don't fish within these waters. Today haddock are found throughout Stellwagen Bank and elsewhere. Fish have tails, they move to different areas over time, to use historical fishing data to conclude that we don't fish in an area is neither reasonable or appropriate. Haddock, Bluefin tuna, and other select species are just a few examples that one can use to point out the flaw in such an approach.

Therefore, regardless on whether we are dealing with recreational anglers or the for hire charter boat community we are adamantly against providing detailed locations of vessel routes and landings since it is not required by NOAA, is considered confidential information by NOAA that could be put to misuse and deny us access to the fishery. We would hope that the public is well informed of such in the future in order for the public to understand that the additional details

that they are providing is not required and confidential. Therefore, we recommend that landing data only include the level of detail to manage the fishery (latitude and longitude only that does not include minutes and seconds) and associated chart area consistent with NOAA requirements that maintains the confidentiality of such information. Please discontinue providing such data to the public.

If you have any questions, please email or give me a call.

Thanks

Capt. Mike Pierdinock

CPF Charters "Perseverance" - New Bedford

Recreational Fishing Alliance - Massachusetts Chairman

Stellwagen Bank Charter Boat Association - Board of Directors

Massachusetts Marine Fisheries Advisory Commission

NMFS - Atlantic Highly Migratory Species Advisory Panel

New England Fishery Management Council - Recreational Advisory Panel