

Charter reporting comments

Most commenters supported the preferred alternatives and electronic reporting in general, as long the system allowed filing a single report to satisfy all agencies and entities, did not require excessively detailed area reporting, and was flexible and easy to meet a wide range of operational needs and technology access.

Opposition to the actions appeared most prevalent at the Key West and Duck Key hearings, and within the written comments. Concerns cited included the time and effort required and likelihood that data will be of poor quality and low reliability if such a program is forced upon participants against their will.

Locations, attendance and comments. The in-person public hearings were held in conjunction with several other amendments; the value for comments reflects those addressing this amendment, while attendance includes everyone.

Type	Date	Location	Attendance	Comments
Q&A	1/20	Webinar		
Hearing	1/25	Richmond Hill, GA	11	4
Hearing	1/26	North Charleston, SC	7	0
Hearing	1/27	Murrells Inlet, SC	10	1
Hearing	1/28	Morehead City, NC	12	3
Hearing	2/1	Dania Beach, FL	20	0
Hearing	2/2	Duck Key, FL	8	2
Hearing	2/3	Cocoa Beach, FL	40	
Hearing	2/3	Key West, FL	48	8
Letter	--	--	--	6

Comments in support of the actions

- Provide fishing reports to improve information and timeliness
- Comprehensive reporting that is equal across the South Atlantic
- Need better data
- Simple, easy, inexpensive, efficient, flexible methods to report
- Eliminate duplicate, multiple reports to multiple agencies (State, SEFSC/SERO, HMS, MRIP survey. NEFSC/NERO)
- Electronic process allowing range of technology for access: laptop, tablets, phones.
- Interface needs to be user friendly
- Consider providing voluntary access for all recreational anglers
- Flexibility in reporting deadlines and times. Some cannot, or prefer to, file until at home or somewhere similar with an internet connection, some only want to file once for the entire week, and others would like an option to file via a smartphone while heading in to the dock.
- Provide useful information back to the fishermen doing the reporting, such as their catch records and hours spent offshore and inshore that can help when renewing charter licenses.
- Existing data is not close to accurate, survey effort is low.

Opposition

- Time and effort required to file reports on top of already busy schedules.
- NOAA does not use or share the data it now collects.
- Costs , time and hardship for small boat operators, they have enough to do and work long days.
- Access to computer or other device is a challenge, and the library is not a viable solution due to distance and waits to access computers.
- Would be okay if sent a form and paid \$5 for each report.
- Data will not be reliable if forced on fishermen; aggravated fishermen will equal bad data.
- Data will not be reliable unless collected by volunteers or fishermen are paid to provided it.

Comments noting concerns

- Level of detail for area reporting.
 - Widespread opposition to providing lat/long detail
 - Difficult to report a lat/long for a single trip report when a trip can have many stops
 - Suggest considering allowing a single trip report to accommodate catch and effort for possible bottom fishing as well as trolling activities.
- Delinquency provisions
 - Enforceability
 - Potential disincentive, could discourage reporting of subsequent trips if taken while an operation is considered 'delinquent' for not reporting prior trips.
 - Some confusion, that language stating you cannot fish when delinquent is equivalent to confiscating the for-hire permit.
 - Concern that provisions are more stringent than current commercial requirements
- Request reminders if reports are not filed, before as well as after reports would be considered delinquent
- Some concerns with the window provided to file reports, notably among those who may be involved in multiple fisheries or commercial and for hire activities.
- The purpose of economic data related to ice usage, fuel burned and seems unnecessary, too much in fishermen's business. .
- Reporting could become the first step to tracking
- Reporting for SAFMC species by those fishing in state waters; will still be need for some other survey mechanisms if states do not have similar program.
- Data availability that is not on par with reporting requirements: if fishermen have to report weekly, data should be available weekly.

Regarding the For Hire Reporting Amendment that I heard about at the recent Key West workshop this past week, while I am a recreational fisherman, after listening to this presentation I had some thoughts that I would like to share:

It's all about the end user experience. If you focus on a delightful and easy to use end user experience that is portable across devices (i.e. Smart phone, tablet, laptop, etc), people will be more inclined to use the app to report. Think about your own smart phone, you tend to use the apps that are the easiest, work the best, and are the most efficient for the task at hand.

I would open the app up to voluntary usage by recreational anglers. I for one would welcome the ability to record my catches. Even if you received limited volunteer recreational participation, this would still be more data than you had today. And with the large number of recreational anglers, even a small percentage of respondents would provide a large amount of data.

As a "reward" for data entry, I would find it especially useful if analytics was applied to the data and the results shared (or be obtainable) for the users. For example, apply to the catch data received other information such as weather, tide, moon phase and other relative data elements to build an environmental overlay for the conditions versus geographic location versus fish caught.

Tools such as Watson Analytics are changing the way data is interpreted. The cognitive tools can find correlations in massive amounts of Big Data that one would either never find manually or may take years to discover.

Thank you for all the hard work your doing to protect and improve our fisheries. Let me know if you have any questions about my statements.

Thank you.

Respectfully Yours,
Mr. Stefan C Blache
Industrial Sector Portfolio Leader
IBM Global Technology Infrastructure Services
Phone: 313-407-7208
E-Mail: sblache@us.ibm.com

Hello Captain Kevin Brown

25 year chart Captain in Islamorada

Are you guys kidding !!! We work 100 hours a week as it is. I can't find time for my family. I have the job of 6 people. You have no ideal how much time we spend answering phones, salient trips, fixing the boat, Tackeal , bookwork and taxes, emailing back n forth 10 times just to sale a charter, trying to keep up with all the licenses n paper work, you will say well it will not take to much of your time !! But I have no time left ,

Thank you

Capt. Kevin Brown

www.goldreservesportfishing.com

www.goldreservecharters.com

[305-394-0792](tel:305-394-0792)

Department of Marine Fisheries,

In reference to electronic log requirement from Charter Boats:

There are so many problems with this proposal I hardly know where exactly to begin. First off, going to the public library to record data is a joke for no other word. Whoever is suggesting this has never waited in line for hours to sit for a half hour allotment only to be told time up before you have completed the task at hand. Another suggestion was to get an app for the iPhone. This too is problematic as the further you pull out to sea generally you lose phone transmission completely. Third would be the additional expense in either hiring a data entry person or buying the computer equipment needed to do this.

I attended a meeting at the Dare Center on February 8th and the consensus by your staff was that the fishermen wanted more government intrusion as far as making recreational fishing as accountable as everyone else. That was not my take on it. I heard it mentioned a few times that either everyone had to meet this new requirement or nobody did. The true desire was that this entire idea be canned because data has been collected in the past and more times than not tends to hurt the fishermen.

The bottom line is that all the scientists and statisticians in the world will never really know how many fish are in the sea. Each person delivering data on this, needs to fish for a year

so they can factor in the unknown of fishing, and the variables outnumber the stars in the sky.

All I can say just like the ranchers on the west coast that are being systematically shut down by the BLM the people that live off of the sea are being hammered out of existence as well by too much government interference . It is a very sad day for America.

Sincerely,

Susan Dineen,

Southern Shores, N.C. 27949

OLRAC SPS International

February 9, 2016

Mr. Gregg Waugh, Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
N. Charleston, SC 29405

Mr. Waugh,

I write as representative of OLSPS International (OLSPS) in support the South Atlantic Fishery Management Council's "Modification to Charter Vessel and Headboat Reporting Requirements". The OLSPS group has nearly 30 years' experience working with complex fisheries data, including as an electronic logbook software solutions provider for over 15 years. We are a group of marine biologists, fisheries scientists, software engineers, statisticians and mathematicians that form a team of data expert with special focus on fishery data, with a keen understanding of the most complex issues inherent in fisheries data collection.

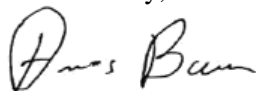
As the Olrac Dynamic Data Logger (Olrac-DDL) electronic logbook provider with years of international experience, we can confirm the Council's assessment that electronic reporting does improve accuracy and timeliness of data collection, allows fishery managers better monitoring of landings and discards, and provides for more accurate assessment of the impacts of regulations. For these reasons we support the Council's proposed action, however given that we do not actively participate in these fisheries, we will limit our comments to general support not specific to the alternatives.

With close to 1,984 charter vessels that would transition to electronic reporting if this action passes, we urge the Council to open up development of ER solutions to a wide range of third party solutions which can meet the data requirements outlined by the Council and NOAA NMFS. This would ensure that there is a right fit product for each fishing operations, while maintaining a data standard.

Speaking specifically of our products, OLSPS's vessel based software system is a certified NMFS GARFO eVTR solution, a participant in NMFS SEFSC's commercial fisheries electronic reporting pilot, and can be offered in a touchscreen enabled tablet format. We also have a web-based (computer or mobile) solution for limited data element solutions, such as for hire vessel reporting. However, unlike a basic website, the OLSPS solution is backed by a sophisticated data management system that can interface with agency data systems (states, ACCSP, NOAA, etc.) and automatically generate data reports and analyses. Further, the design of this system allows for rapid updating to accommodate evolving data collection needs. Finally, OLSPS is a member of a technology and service provider team, who collectively offer an integrated electronic monitoring and reporting solution.

Thank you for the opportunity to comment. If you would like to learn more please contact our local representative, Heidi Henninger, at heidi@offshorelobster.org or 603-828-9342.

Sincerely,



Dr. Amos Barkai
CEO, OLSPS

Horan, Wallace & Higgins LLP

608 WHITEHEAD STREET
KEY WEST, FLORIDA 33040

DAVID PAUL HORAN, P.A.*
R. BRUCE WALLACE, P.A.
CARA A. HIGGINS, P.A.**
DARREN M. HORAN
CARL R. STEVENS***

February 9, 2016

RECEIVED
FEB 16 2016
South Atlantic
Fishery Mgmt. Council

(305) 294-4585

(305) 294-3488

FAX (305) 294-7822

FAX (305) 294-4593

*ALSO MEMBER COLORADO BAR

**ALSO MEMBER NEW JERSEY & PENNSYLVANIA BAR

*** ALSO MEMBER CALIFORNIA BAR

Gregg Waugh
Executive Director
South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Re: For-Hire Reporting Amendment Related to Combined Annual Catch Limits

Dear Gregg,

Bob left some big shoes to fill. Congratulations! Your quote that, "I want to see both recreational and commercial fishermen fishing as much of the year as possible and discarding as few fish as possible" is why I'm sending you this letter.

As you are aware, the annual recreational catch of snapper (or any food fish) is a total guess. It seems that someone got the bright idea that requiring charter boats to report their catch may give some insight into the annual recreational catch. This is the "Death of Common Sense"! There are less than 2,000 federal permitted charter boats under South Atlantic Counsel jurisdiction. There are literally millions of recreational fishermen fishing from hundreds of thousands of boats that fish the EEZ. The problem with requiring charter boats to conform to commercial reporting requirements is that charter boats are "recreational" not "commercial". (i.e. recreational bag and size limits apply).

It seems like the South Atlantic Counsel is looking into requiring all charter boats to report not only catches, but lat/long coordinates, fuel burned, ice used, length of trip, number of guests. Why? They are recreational, not commercial. What good is the data and why would NMF think the charter boats would voluntarily cooperate? Holding federal permits hostage will insure collection of totally unreliable data.

I do not think the solution is to make charter boats part of the commercial allocation. The commercial closures hurt commercial fishermen, but they would be devastating to charter boats and Florida's tourism.

The way you could approach this is to again allow the charter boats to sell part of the allowed recreational catch of fish the guests don't want. If the charter boats are given this incentive, a vast majority would be in favor of reporting requirements. This would have a good chance of working, but attempting to burden 2000 charter boats without any incentive to work with you will not work.

Finally, as to the mutton snapper regulations, your own data shows they are not overfished. Many of the Keys charter boats believe 10 per person is wasteful. The catch should be cut in half – 5 per person and during the spawn (May – June) it could be 2 per person and a maximum of 12 per boat.

I've represented large organizations of US Southeastern commercial fishermen and litigated a lot, but this letter is not for any clients. It's just an attempt to put some common sense into future regulations.

Hope to see you here in the Keys soon.

Sincerely yours,



DAVID PAUL HORAN
For the Firm

DPH:krh

Bcc: Key West Charter Boat Ass'n.
Brice Barr

EMAIL ADDRESS: leesouthard1801@comcast.net

MESSAGE:

As a Charter Captain in Georgia I am concerned about the new proposed reporting requirements for charter boats. Although I do not know the cost of the required equipment It looks like it will cause undue hardship on the small boat operator.