



Gulf of Mexico Fishery Management Council

Managing Fishery Resources in the U.S. Federal Waters of the Gulf of Mexico

2203 N. Lois Avenue, Suite 1100

Tampa, Florida 33607 USA

Phone: 813.348.1630 • Toll free: 888.833.1844 • Fax: 813.348.1711

www.gulfcouncil.org

April 13, 2017

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Dr. Michelle Duval
Chair, South Atlantic Fishery Management Council
4055 Faber Place Drive, Suite 201
North Charleston, SC 29405

Dear Dr. Duval:

Thank you for reviewing and approving the Gulf Council's Generic For-Hire Reporting Amendment at your March 2017 Council meeting. We also appreciate your request "that the Gulf Council consider an exemption to the Gulf for-hire trip level reporting requirements for vessels with Gulf and South Atlantic permits when taking a trip solely in South Atlantic waters, and to allow these vessels taking such trips to report according to the South Atlantic requirements." The purpose of this letter is to address this request.

The Gulf Council is appreciative of the review and careful consideration of our for-hire reporting amendment and its potential impacts on all for-hire vessel operators in the southeast region. The Council is also sensitive about duplicative requirements on fishermen. However, the Gulf Council is concerned that if the requested exemption were put in place at this time, it would result in additional burden on the owners and operators of these vessels. In particular, the exemption could result in duplicative reporting and confusion about which reporting requirements are applicable, particularly when a vessel in South Florida may fish in both jurisdictions on a single trip. This could reduce the improvements in timeliness and accuracy of fishery data from being realized, which is a central objective of both the Gulf and South Atlantic amendments. In addition, the Gulf's proposed program requires a NMFS approved hardware/software device with GPS capabilities to be permanently affixed to the vessel and remain active on the vessel at all times. This would apply, even if the requested trip level reporting exemption were implemented, as it is vital to the data accuracy of the overall Gulf program.

For these reasons, the Gulf Council does not feel the exemption should be examined in the Generic For-Hire Reporting Amendment, which has already been approved for submission to the Secretary of Commerce for implementation. After discussions with NMFS, the logistics of implementing the Gulf Amendment, if approved by the Secretary, will require some length of time to analyze and approve the most appropriate "NMFS approved hardware/software device(s)". This interval will provide the Gulf Council the opportunity to continue the discussion of the most streamlined path forward for our dually permitted, Gulf and South Atlantic for-hire fishermen. The Gulf Council shares the objective of the South Atlantic Council to reduce duplicate reporting requirements for vessel owners and operators and looks forward to continued

work with the South Atlantic Council to facilitate improved data collection and simplified reporting requirements for all vessel operators.

Sincerely,

A handwritten signature in black ink, reading "Leann Bosarge". The signature is written in a cursive, flowing style.

Leann Bosarge
Chair, Gulf Council

JF:CMS

cc: Gulf Council Members
Gulf Council Staff
Susan Gerhart and Jack McGovern
Gregg Waugh and John Carmichael
Bonnie Ponwith and Theo Brainerd