



Mid-Atlantic Fishery Management Council

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Michael P. Luisi, Chairman | G. Warren Elliott, Vice Chairman

Christopher M. Moore, Ph.D., Executive Director

May 1, 2020

Mr. Michael Pentony
Regional Administrator
National Marine Fisheries Service
55 Great Republic Drive
Gloucester, MA 01930-2276

Dear Mike:

On Tuesday, April 28th, the Council hosted a webinar to provide training to recreational anglers on the upcoming tilefish permitting and reporting action. During this webinar, several concerns were raised by stakeholders regarding the utility of the current reporting platforms (specifically, Fish Online) for their activities. These platforms were designed around the VTR structure which was originally developed for use by the commercial fishing industry and later adapted for the for-hire sector. These stakeholders were generally supportive of the data collection but cautioned that the reporting platform was ill-suited to collecting reliable data on their activities. These concerns were reiterated to the Council by one of our Advisory Panel members via a very constructive email following the webinar (which has been shared with GARFO staff).

This action represents the first time that the Council has required reporting by the recreational sector. Thus, it is imperative that the systems be usable and accepted by the community, resulting in data that will be effective for fishery management purposes. A reporting platform that is specifically designed for the recreational sector would be ideal but is not realistic given our (now) extremely short time frame. Council technical staff reviewed the comments and recommendations presented and provide the following suggestions on actions to address these concerns:

1. Fish Online refinements:

- a. Customize the fields that are visible whenever a user logs in under a recreational tilefish permit and only display those that are necessary.
- b. Eliminate “time sailed” and “time landed” (keep only date). Reason: a large portion of tilefish trips are opportunistic add-ons to HMS trips and therefore, even if the users correctly enter the time sailed and landed it is not usable for management or research purposes. A suggestion was made to include “total time fishing” which might be usable, but as of now, is not an existing VTR field.
- c. Automatically populate gear code to “Hand Line Rod and Reel.” (Note: A suggestion was made to add “Electric Reel” to aid in future management decisions).
- d. Define “soak time” for the recreational purposes (average amount of time the lines were actually fishing).

- e. Eliminate the collection of gear quantity. As defined in the VTR, this is the number of hooks per line. The data collected from this field could not be trusted considering that the interpretation will vary with each user. Keep the number of anglers.
 - f. Location: eliminate latitude and longitude but keep chart area with a pop-up map to help anglers determine the appropriate location.
 - g. Remove (or hide) the offload tab from the required information for submission.
2. Ensure that an Android version of Fish Online is available with adequate time for stakeholders to learn how to use the platform before implementation.
 3. Ensure that a support helpline for the app is available 24/7 for several weeks prior to and after implementation. The Council has reiterated this as a priority and has proposed a potential solution (with Council funding).
 4. Develop an outreach plan to inform and educate affected recreational stakeholders about the new permitting and reporting requirements. It is imperative that a broad range of outreach methods be utilized before and during implementation of this action to ensure recreational awareness and compliance. The Council has previously expressed its willingness to collaborate with GARFO on training workshops and other outreach efforts.
 5. Add a banner on the HMS permit page with a notice and link to the tilefish permit page. Notify everyone with the HMS permit about the need for the tilefish permit. Also, develop a social media post with the proper links so anglers can help get the information out to others when this goes live.

We feel it is critical that these issues, particularly an outreach plan (see #4), are addressed prior to the launch of this important recreational data collection program. We hope all available effort is made to address these issues. Please feel free to contact me if you have any questions.

Sincerely,



Christopher M. Moore, Ph.D.
Executive Director

cc: Mid-Atlantic Fishery Management Council

David Gouveia

Peter Couture

Matthew Seeley