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UNITED STATES DEPARTMENT OF COMMERCE  
National Oceanic and Atmospheric Administration  
NATIONAL MARINE FISHERIES SERVICE  
NORTHEAST REGION  
55 Great Republic Drive  
Gloucester, MA 01930-2276

MAR 21 2013



C.M. "Rip" Cunningham, Jr., Chairman  
New England Fishery Management Council  
50 Water Street  
Newburyport, MA 01950

Dear Rip:

Thank you for the request you submitted on behalf of the Councils, asking for information about my staff's ability to provide data to support the possible future development of a sector management or Individual Transferable Quota (ITQ) program for monkfish. Specifically, you requested a database that would contain anonymous vessel-level data for the period 2000-present, with vessel landings distinguished by fishing area (Northern or Southern), and by trip type (directed monkfish or non-directed monkfish trip). This information would be used by the Monkfish Committee to evaluate various allocation approaches based on landings histories.

You also asked for information about the workload involved if my staff were to use the information to notify all monkfish permit holders of the allocations that would result under various sector or ITQ alternatives, which have yet to be developed. This would, presumably, involve providing them with their vessel-specific information, along with the annual monkfish landings for each year during the period. This aspect of your request involves the steps that would be taken in the implementation of an allocative program, other than the appeals process.

My staff and I have struggled with our response to your letter. I understand why Council members and the public would like to have detailed data that would allow them to evaluate their individual position as management alternatives are developed. In addition, if the Councils were to move forward with an ITQ program, there would be a need for a referendum, making the information more critical for industry members, should that management measure be proposed by the Councils. However, the information being sought is similar to the information that would be required to implement a sector or ITQ program, before the Councils have arrived at the point of deliberation where it is clear that you intend to proceed further with either management approach. As a result, we have to consider the scope of the request in light of our concerns about current staffing levels and workload—concerns that are heightened by the ongoing FY 2013 budget uncertainty.

The staff who would carry out this request work for two programs within the Analysis and Program Support Division (APSD). We currently have six staff members who respond to all requests for fishery-dependent data made by internal staff and the public. One team of three provides data summaries to about 500 clients a year, including providing vessel landing histories to vessel owners. Another team of three statisticians conducts the analyses necessary to integrate the data from our fishery-dependent data collections for a variety of purposes including catch monitoring, Council PDTs/FMATs, and internal analytical needs. This analytical team had six staff members one year ago, and has had to make a number of adjustments to compensate for three staff vacancies that occurred over the past year.



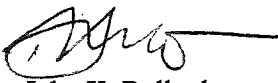
cc: Council, MF Cte, Peh, CSK (3/25)

We propose that we could conduct the necessary analyses in 6 months for the current 740 limited access monkfish eligibilities (we assume this request is for limited access monkfish permits only—if open access permits are included it would add approximately 500 vessels and the project would take substantially longer). One of our three analysts would complete the programming needed, and generate trip-level data to support the request for anonymous vessel-level data. The product would be a dataset showing anonymous, annual, vessel-level landings by area by trip type. We note that this anonymous data is confidential information, and we believe it will not be possible to provide much other descriptive information about the vessels because it could be sufficient to discern vessel identities. If the Council wishes to see additional information about these vessels (for example, home-states or vessel size) we would need to review the data to see how that could be portrayed and still preserve confidentiality.

A member of our data team would work full-time to review the permit files to see if the current owners of the limited access monkfish eligibilities have been authorized to receive confidential data submitted by previous owners. These authorizations are made in a variety of documents and the information is not computerized, so the permit files must be reviewed manually to see if authorizations are on record. This step is necessary because landings data for a vessel that was reported by an individual other than the current owner is confidential, and can only be provided to the current owner if there is written authorization from the submitter. This research would have to be completed before there could be any fleet-wide release of landings history data. However, we note that, based on our experience in previous programs, this review is likely to reveal that many owners lack necessary authorizations, and would therefore be provided only partial landings history. We think these projects are best carried out concurrently because we expect the release of the anonymous vessel-level summary data will result in an influx of individual data requests from the owners of limited vessel monkfish eligibilities—requiring us to research the confidential data releases.

At our current staffing levels, I am concerned that this project will require the commitment of a significant share of the available staff time in APSD. I need the assurance of the Councils that this project is one of your highest priorities, and that your staff and members understand that it will affect our ability to carry out other projects before I can make a commitment to this project. I look forward to discussing this further with you and propose that we include this topic on the agenda for the upcoming NRCC meeting.

Sincerely,

  
John K. Bullard  
Regional Administrator

cc: Richard Robins, MAFMC, Goodale, Darcy, Hawes, Pentony, Lanning, Ruccio



New England Fishery Management Council

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C.M. "Rip" Cunningham, Jr., *Chairman* | Paul J. Howard, *Executive Director*

February 4, 2013

John Bullard, Regional Administrator  
NMFS Northeast Regional Office  
55 Great Republic Drive  
Gloucester, MA 01930

Re: Monkfish Amendment 6 Data Needs

Dear John:

On the recommendation of the Monkfish Oversight Committee, the New England Council requests that you inform the Council of NMFS NERO's ability to provide in a timely manner the data necessary for the purpose of developing a sector management or ITQ program for monkfish.

The Committee seeks individual vessel landings data separated by directed and non-directed trips by year and area for each vessel in anonymous format for the years 2000 to the most recent available. The Committee will use these data to evaluate various landings history allocation options under consideration in Amendment 6. In addition, we also need to know the Agency's ability, and time required, to notify permit holders of their specific monkfish allocations or PSE shares, by management area, for each of the sector or ITQ-like options. Individual vessel owners may request their own landings history to determine where they may fall within the various options, and, thereby, provide more informed comment during the development process, rather than having to wait until final alternatives are identified.

Thank you for your consideration of this matter.

Sincerely,

C.M. "Rip" Cunningham, Jr.  
Chairman

