ENFORCEMENT CONSULTANTS REPORT ON
STATUS OF VESSEL MONITORING SYSTEM PLANS

The Enforcement Consultants (EC) met and reviewed the Ad Hoc Vessel Monitoring System Committee report and Supplemental NMFS Report, Exhibit G.3.b *A Program to Monitor Time - Area Closures in the Pacific Coast Groundfish Fishery* and make the following recommendations.

Issue 1: Monitoring Systems. we recommend Alternative 3, to include limited entry, California halibut, pink shrimp, but not crab. We recommend the declaration for legal fishing incursions into the Groundfish Conservation Area be a one time declaration to be made prior to leaving port with the single declaration remaining in effect until changed. No 24-hour pre-notification is necessary, nor do we see the need for a notice of landing declaration prior to returning to port.

Issue 2: Coverage, we recommend the Alternative 2B VMS option, as clarified, federal limited entry vessels participating in West Coast fisheries must carry operating Vessel Monitoring System (VMS) units.

Gear Type: We endorse the requirement that only one gear type be on board when fishing in the conservation zone and no fishing occur during the trip that is inconsistent with fishing in the conservation zone including species and trip limit possession.

Gear Storage: After discussions with the GAP on this issue, we recommend the regulation on gear storage when transiting the conservation zone be amended to include; trawl gear can remain on deck uncovered if the trawl doors are hung from their stanchions, and the net is disconnected from the doors.

One final issue discussed with the GAP involves the Dover sole/thornyhead/trawl-caught sablefish complex tier limit and daily-trip-limit (DTL). Prior to participating in the DTL fishery, fishers must fulfill the tier limit. Often, trips are made for small amounts to satisfy this requirement, resulting in the potential for overages. We are sympathetic to this problem and support modification of the regulations to address this situation.

PFMC
10/30/02