

ENFORCEMENT CONSULTANTS REPORT ON
CONSIDERATION OF TRAWL ROCKFISH CONSERVATION AREA (RCA)
BOUNDARY MODIFICATIONS

The Enforcement Consultants, (EC) have received numerous requests to comment on the enforceability of Alternatives 1 and 2 as defined on pages 15-17 in Agenda Item G.6.b, Draft EA, September 2013. Alternative 1 proposes one shoreward and one seaward line between 48° 10' N. Latitude and 40°10' N. Latitude for period 6 of 2013 and all of 2014. Alternative 2 proposes splitting this area into 2 areas at 45°46' N. Latitude with differing RCA lines, thus doubling the number of RCA lines. The Office of Law Enforcement Northwest Division Vessel Monitoring System Program and its technicians are fully capable of monitoring both options as are state enforcement and the U.S. Coast Guard. So in this regard, there are no enforceability concerns.

The EC suggests the Council may want to consider this issue under the auspices of regulatory complexity and the potential confusion for fishers. Alternatives 1 and 2 are less complex than the status quo alternative, with Alternative 1 being less complex than Alternative 2.

PFMC
09/13/13