

ENFORCEMENT CONSULTANTS STATEMENT ON  
STATUS OF FISHERIES AND INSEASON ADJUSTMENTS

- Employing a boundary fathom curve restriction running the length of the West Coast represents a significant change from past Council management measures and will mark the transition to a much greater dependence upon at-sea enforcement. Previous conservation measures were largely enforced by the comparatively inexpensive method of dockside enforcement. The Council should give careful consideration to the costs associated with at-sea enforcement during their decision making process; to include vessels, aircraft, observers, and vessel monitoring systems (VMSs).
- Off Oregon and Washington, the proposed Dover sole/thornyhead/trawl-caught sablefish complex opening will require vessels to fish over 40 miles offshore. Weather conditions during the period of the opening – October through December – will require the Coast Guard to provide a major cutter (210' or greater) for effective enforcement. The major cutter scheduling conference for fiscal year 2003 will be held in August; as of today, the Coast Guard cannot confidently state that a major cutter will be available to patrol off Washington and Oregon during this opening.
- State agency patrol vessels in Oregon and Washington will not routinely be capable of patrolling this opening, so enforcement will rely heavily – possibly exclusively – on Coast Guard surface and air assets. As always, operational requirements may force these assets to shift to other missions for part or all of the opening period. For this reason, the Council should view this complete reliance on Coast Guard assets as a temporary, transitional need while alternative enforcement methodologies such as VMS are investigated.
- The Coast Guard would also like to state their concern with the safety of this proposed fishery. Some participating vessels will require deck gear modifications (e.g., adding additional cable to fish greater depths). Adding weight above a vessel's center of gravity and fishing further offshore in late fall/winter weather conditions may reduce the safety margins available to fishermen, observers, and enforcement officials.

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06/20/02

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