

ENFORCEMENT CONSULTANTS REPORT ON
GROUND FISH MANAGEMENT MEASURES FOR 2004: TENTATIVE ADOPTION

The Enforcement Consultants (EC) strongly recommend the Council consider eliminating the B Platoon option, so that one set of regulations apply to the entire limited entry trawl fleet beginning in the year 2004. The B Platoon option creates a situation of where full implementation of management measures are staggered by fifteen days, adding complexity to an already challenging regulatory regime. We have already experienced confusion on the part of fishers related to which limits apply, particularly when there is an inseason adjustment. Additionally, the implementation of a Vessel Monitoring System (VMS) can be hampered. From the beginning of discussions of VMS, the EC has advised the Council to keep depth based management simple. Unfortunately, the system now incorporates multiple lines during multiple periods. At any given time of year, the depth based management is defined by a series of way points numbering over 1,000. When the lines are changed, new lines must be programmed, and new alerts must be incorporated. OLE best estimate is that reprogramming could take two to five days. Additionally, every change of lines creates opportunity for error, effecting everyone involved.

It has come to the attention of the EC that, due to an oversight, intended language restricting fixed gear vessel activity in the fixed gear Rockfish Conservation Area (RCA) was left out of the proposed VMS rule. For 2004, the EC recommends the following addition to the Prohibitions section of the VMS rule (660.306(z)(5)):

“(cc) Operate any vessel registered to a limited entry permit with a fixed gear endorsement in a non-trawl RCA (as defined in 660.302), except for purposes of continuous transiting.”

That same restriction already exists for trawl vessels operating in the trawl RCA and adoption of this recommendation creates consistency throughout the limited entry fleet. In the case of a fixed gear vessel, the same argument applies that was made for restricting the activities of trawl vessels when in an RCA. A VMS signature left by a vessel drifting in the RCA, and one left by a vessel fishing, are similar. Allowing drifting would require costly investigatory responses when law enforcement assets are limited.

PFMC
09/10/03