

ENFORCEMENT CONSULTANTS REPORT ON AMENDMENT 19
(ESSENTIAL FISH HABITAT)

The Enforcement Consultants (EC) met in August with the Groundfish Management Team. During the discussion several options were provided on how to deal with regulatory language describing gear restrictions.

The EC's recommendation was to list allowable gear in restricted areas. This strategy was based on marine reserve personnel concern with development of new or undefined gear that may be used in the future with negative impacts. The approach was to list allowable activity versus prohibited activity.

The GMT's recommendation to list prohibited gear or activity is just as effective but may create a situation where some gear in the future may have to be defined and added to the list if found to have negative impacts.

Additionally, in reviewing Supplemental Attachment 3, we noted in two places where there is an attempt to limit recreational gear to 6 oz. of weight, however, the language only limited the size of the individual weight and not the total amount of weight that could be used. [Section 660.306 (12) 66.370(3)].

PFMC
09/21/05