

**ENFORCEMENT CONSULTANTS REPORT ON CHANGES TO TRAWL CATCH SHARE  
 PROGRAM GEAR REGULATIONS-FINAL ACTION**

The Enforcement Consultants (EC) have reviewed the gear change alternatives and have the following comments.

The EC appreciates the presentations by National Marine Fisheries Service West Coast Region staff members, Jamie Goen and Melissa Hooper, who provided an overview of the alternatives for the Groundfish Advisory Subpanel and EC. In addition, we met with Dr. Michelle McClure Director of the Northwest Fisheries Science Center’s Fishery Resource and Monitoring Division. Dr. McClure provided the EC feedback on the capabilities of the observer program.

The EC evaluated the enforceability of the regulations as proposed using three compliance monitoring approaches that may be potentially used. The three compliance monitoring approaches are electronic monitoring (EM), the observer program, or an officer. The attached table highlights the results of our analysis.

In the table below we use the term “Could, but don’t” to refer to a situation when, for example in Alternative A1, if an observer is on board, they could have the capability to measure the net, but currently do not. Conversely, officers do measure the net; while EM does not have the capability to measure a net. We also use the term “Could” to indicate that if the regulation was changed, an observer has the capability to monitor for compliance.

<b>Minimum mesh size (Issue A, DEIS Sections 2.1 and 4.1)</b>		<b>EM</b>	<b>Observer</b>	<b>Officers</b>
Alternative A1 (No-action)	4.5 inches for bottom trawl and 3 inches for midwater trawl.	No	Could but don’t	Yes
Alternative A2	4 inches for bottom trawl.	No	Could	Yes
Alternative A3	No minimum mesh size for bottom or midwater trawl.	N/A	N/A	N/A
<b>Measuring mesh size (Issue B, DEIS Sections 2.2 and 4.2)</b>				
Alternative B1 (No-action)	Trawl mesh size measurements taken between knots.	No	Could but don’t	Yes
Alternative B2	Trawl mesh size measurements taken between knots or, in knotless mesh, between corners.	No	Could	Yes
<b>Codend (Issue C, DEIS Sections 2.3 and 4.3)</b>				
Alternative C1 (No-action)	Only single-walled codends could be used in any trawl. Double-walled codends prohibited. Chafing gear could not be used to create a double-walled codend.	No	Could but don’t	yes
Alternative C2	No codend restrictions.	N/A	N/A	N/A

<b>Selective Flatfish Trawl (Issue D, DEIS Sections 2.4 and 4.4)</b>		<b>EM</b>	<b>Observer</b>	<b>Officers</b>
Alternative D1 (No-action)	SFFT would be a two-seamed net as further defined at §660.130(b)(3)(ii)(A). SFFT required shoreward of the RCA north of 40°10' N. latitude, and permitted, but not required, shoreward of the RCA south of 40°10' N. latitude. SFFT permitted seaward of the RCA coastwide.	Unknown	Could but don't	Yes
Alternative D2	The SFFT definition would be modified to allow a two-seam or a four-seam net.	No	Could	Yes, but more complicated
Alternative D3	The SFFT definition would be modified to allow two-seam or four-seam net AND would eliminate the SFFT requirement shoreward of the RCA north of 40°10' N. latitude and would replace it with small footrope (like south of 40°10').	No	Could	Yes, but more complicated
<b>Chafing Gear (Issue E, DEIS Sections 2.5 and 4.5)</b>				
Alternative E1 (No-action)	Bottom trawl chafing gear last 50 meshes, less than 50 percent circumference, etc. (see §660.130(b)(3)(iii)) Midwater trawl chafing gear may not cover top of codend, etc. (see §660.130(b)(4)(i))	No	Could, but don't	Yes
Alternative E2	Bottom trawl chafing gear revised to match midwater trawl chafing gear requirements.	No	Could	Yes
Alternative E3	Eliminate chafing gear restrictions for bottom trawl and midwater trawl. (assumes retain prohibition on double-walled codend, but related Alternative C2 would remove prohibition)	N/A	N/A	N/A

<b>Multiple Gears (Issue F, DEIS Sections 2.6 and 4.6)</b>		<b>EM</b>	<b>Observer</b>	<b>Officers</b>
Alternative F1 (No-action)	<u>On vessel:</u> bottom (small/large footrope) or midwater or fixed gear <u>Fished on trip:</u> only 1 gear	Yes	Yes	Yes  No
Alternative F2	<u>On vessel:</u> bottom (small/large footrope) and midwater; or fixed gear <u>Fished on trip:</u> only 1 gear	Yes	Yes	Yes  No
Alternative F3	<u>On vessel:</u> Multiple gears onboard. <u>Gear Type Sub-option A:</u> Use any trawl gear.	Yes	Yes	Yes
	<u>Gear Type Sub-option B:</u> Use any legal IFQ groundfish gear (gear type).	Yes	Yes	Yes
	<u>Sorting Sub-option A:</u> Vessels must separate catch by gear type. Landings recorded on separate electronic fish tickets by gear type.	Could with more cameras, more review	Could	No
	<u>Sorting Sub-option B:</u> Catch by gear type could be co-mingled. <i>NOTE: gear type sub-options independent of sorting sub-options.</i> <u>Fished on trip:</u> more than 1 gear	N/A	N /A	N/A
<b>Fishing in Multiple IFQ Management Areas (Issue G, DEIS Sections 2.7 and 4.7)</b>				
Alternative G1 (No-action)	Allowed to fish in one IFQ management area per trip.	Yes	Yes	Yes
Alternative G2	Allowed to fish in multiple IFQ management areas per trip. The catch would have to be sorted by IFQ management area and recorded on separate electronic fish tickets.	Could with more cameras, review	Could	No
<b>Hauling Onboard before Previous Catch is Stowed (Shorebased IFQ Program only) (Issue H, DEIS Sections 2.8 and 4.8)</b>				
Alternative H1 (No-action)	Prohibited to bring a haul on board before all catch from the previous haul had been stowed.	Yes	Yes	No
Alternative H2	Allow a new haul to be brought onboard and dumped on deck before all catch from previous haul had been stowed. No mixing of hauls until the observer has collected samples.	Yes (if kept separate) with increased video review	Yes (if kept separate)with increased complexity	No