ENFORCEMENT CONSULTANTS REPORT ON ENDANGERED SPECIES ACT MITIGATION MEASURES FOR SEABIRDS - SCOPING

The Enforcement Consultants (EC) have reviewed Agenda Item G.5 Attachment 1 and the Situation Summary and has the following comments.

The Situation Summary recommends employing streamer lines consistent with Alaska streamer line regulations for Federal waters, employing streamer lines on boats 26-55 feet in length, **or** to set longlines after civil sunset.

In reference to setting gear after civil sunset, the EC recommends that common terms like between "local sunset" and "local sunrise" for the area fished be used. This provides a set time frame everyone can understand and not be left open ended. Consideration may also be given to adding a specific time after sunset and before sunrise, such as "30 minutes after local sunset to 30 minutes before local sunrise." The EC understands the intent is to either use approved streamer lines if setting gear during daylight hours, or set gear during the hours of darkness. The EC recommends against using terms like "civil dusk" or "civil dawn" as these would add further confusion to the regulation.

PFMC 11/05/18