

ENFORCEMENT REPORT ON  
PRELIMINARY EXEMPTED FISHING PERMIT APPROVAL FOR 2021-2022

The Enforcement Consultants (EC) have reviewed the exempted fishing permits (EFPs) and have the following comments on the Coastal Conservation Association California EFP and the Kosta EFP.

**Agenda Item H.5, Supplemental Attachment 4 – Coastal Conservation Association California EFP**

The proposed EFP will allow designated commercial passenger fishing vessels (CPFV) to take and retain fish in an area where fishing is currently prohibited. Some of the fish (cowcod) proposed for retention is currently considered a prohibited species. The EC has the following recommendations to consider if this EFP were to proceed:

1. 100 percent observer coverage or vessel monitoring system (VMS) should be required on every fishing trip to document the area fished.
2. Any depth restrictions should be defined by using the established federal latitude/longitude coordinates for specified contour lines. These coordinates are easily accessible and will assist both enforcement and the CPFV operator in knowing where fishing activity should take place.
3. The names of all participating vessels and operators shall be submitted to properly conduct a compliance background check.
4. Any prohibited species shall be recorded and placed in a designated and separate ice chest that will be given to a designated agency representative upon returning to the dock. This will allow the orderly and secure collection of any prohibited species.
5. Retention of any prohibited species should not be allowed by crew and passengers to avoid any potential problems with traceability if retention were allowed.

**Agenda Item H.5, Supplemental Attachment 6 – Kosta Oregon Experimental Fishing Permit Proposal**

1. As the EFP is currently written it is suggesting only 20 percent observer coverage. This EFP seems to be modeled after the Emely/Platt EFP which has been in operation since 2013 and currently still has 100 percent observer coverage. The EC recommends if this EFP moves forward for consideration it is required to have 100 percent observer coverage similar to the Emely/Platt EFP since the participating boats will be fishing new gear with potential yelloweye impacts if fished incorrectly.