

**ENFORCEMENT CONSULTANTS REPORT  
ON NON-TRAWL SECTOR AREA MANAGEMENT MEASURES**

The Enforcement Consultants (EC) have reviewed the documents pertaining to Agenda Item E.6, (Non-trawl Sector Area Management Measures) and provide the following comments.

The EC has concerns with any proposed increase in authorized fishing activity within a groundfish conservation area due to the increased need for additional shoreside monitoring and at-sea enforcement to ensure gear and retention requirements are met. The EC prefers maintaining the status quo under the No Action alternative or making changes to the boundaries of the Non-Trawl Rockfish Conservation Area (NT\_RCA).

The EC provides the following recommendations in support of developing a range of alternatives:

**General:**

Gear issues. The EC notes that new hook-and-line gear definitions need to be developed for the West Coast Groundfish fishery. Consideration should be given to both shoreside and at-sea enforceability when establishing gear specifications. The EC is concerned about the complexity and enforceability of any additional gear types being allowed in the NT\_RCA.

Declaration Reporting Requirements. The EC recommends that any new gear type and sector approved for use be added to the declaration reporting requirements (50 CFR 660.13(d)).

**Alternative 1:** Allow Open Access Vessels to Operate in the NT\_RCA when using Approved Hook-and-line Gear

Fishing area options. The EC recommends consideration of Sub-option 1A, vessels may fish either inside the NT\_RCA or outside, but not both on the same trip.

Gear on-board sub-options. The EC recommends consideration of Sub-option B1, allow vessels to carry only approved hook-and-line gear onboard when fishing occurs in the NT\_RCA, and recommends against consideration of Sub-option B2, allow vessels to carry on board multiple gear types and use other gear outside the NT\_RCA. The EC considers Sub-option B2 to be unenforceable.

**Alternative 2:** Allow Limited Entry Fixed Gear Vessels to Operate in the NT\_RCA when using Approved Hook-and-line Gear

The EC has the same recommendations for the sub-options as are noted under Alternative 1.

**Alternative 3:** Reconfiguration of NT\_RCA Boundaries. As stated above, the EC prefers adjusting the NT\_RCA boundary to open the area to additional fishing. We do have concerns about enforceability in some areas where the inner and outer boundary depth contours are very close (e.g., along a steep bank/shelf with little separation), which makes monitoring with vessel monitoring systems (VMS) ineffective.

**E.6.a. Supplemental WDFW Report 1.** The EC has no concerns with Washington Department of Fish and Wildlife's (WDFW) proposal to adjust the seaward boundary of the NT\_RCA off Washington. The EC is concerned about proposals that establish new gear-specific fishing areas.

The EC appreciates the acknowledgement by WDFW that any areas identified need to be large enough to be enforced by VMS.

**Cowcod Conservation Area (CCA).** The EC has no concerns with including CCA changes to the range of alternatives.