

ENFORCEMENT CONSULTANTS REPORT ON GREATER FARALLONES AND
MONTEREY BAY NATIONAL MARINE SANCTUARIES CORAL RESTORATION AND
RESEARCH PLAN-SCOPING

The Enforcement Consultants (EC) have reviewed reports associated with H.2 including, [H.2, Attachment 1](#) and [H.2.a, ONMS Report 2](#): Deep-Sea Coral Research and Restoration Scoping Document, and have the following comments:

1. Areas For Consideration:

The EC reviewed the proposed scoping document and are comfortable with the area configurations. The EC provided feedback at the June 2023 Council meeting advising the proposed areas follow the Essential Fish Habitat Conservation Area (EFHCA) boundaries for ease of compliance or to choose lines that are on the same latitude or longitude. The length and width of the proposed areas are also larger than 1 nm, which is the typical distance needed for an area closure to be enforced effectively with Vessel Monitoring Systems (VMS) reporting with a 15 minute ping rate.

2. Enforcement Concerns:

The EC appreciates H.2, Attachment 1: Staff White Paper. The EC reviewed and concurs with the enforcement concerns addressed in the document for each fishery.

The EC does not see a significant barrier to enforcing the closing of the proposed areas to fisheries that require VMS. Due to the remote location of the proposed fishing areas, VMS would be an effective tool to monitor fishing activity and detect potential violations. Any fishery that does not require VMS would be difficult to enforce since these fisheries could only be monitored with on-scene air and surface assets.

PFMC
09/10/23