

## ENFORCEMENT CONSULTANTS REPORT ON PRELIMINARY PREFERRED MANAGEMENT MEASURE ALTERNATIVES FOR 2025-26 FISHERIES

The Enforcement Consultants (EC) have reviewed the documents associated with Agenda Item F.5, Preliminary Preferred Management Measure Alternatives for 2025-26 Fisheries. The EC also met with members of the Groundfish Management Team to discuss the agenda item and have the following comments specific to [F.5, Attachment 2: REVISED Pacific Coast Groundfish Fishery 2025-2026 Harvest Specifications and Management Measures](#):

### **Chapter 8. California Recreational Fishery, Alternative 1, section 2.1.5 Size Limits**

After review of 2.1.5 Size limits, the EC recommends no action to the proposal of removing the California recreational minimum size limit for cabezon, greenling, and California scorpionfish. Maintaining status quo assists enforcement by requiring some species to be landed whole, which assists in identification and verifying limits. If size limits are removed, the EC recommends that cabezon and greenling fillets be required to have the entire skin attached so individual species can be identified and counted in the field. Additionally, the EC recommends changing the fillet requirement on California scorpionfish and lingcod from a 1” skin patch to requiring the entire skin to be attached for consistency with the cabezon and greenling recommendation and to ensure the ability for enforcement officers to distinguish between fillets of species that closely resemble one another, such as California scorpionfish, lingcod, cabezon, and greenling.

To put this in context, in southern California, Commercial Passenger Fishing Vessels (CPFVs) commonly return from multi-day fishing trips with hundreds to over a thousand groundfish fillets onboard. To verify compliance, enforcement is tasked with counting and identifying each fillet to verify that species limits and subbag limits have not been exceeded. Fillets that have the entire skin attached expedite this process, making it easier for enforcement to correctly identify the species and reduce the amount of time the CPFV passengers have to wait. This also reduces handling, which can negatively affect fillet quality and sanitation.

### **Chapter 9 A. Open Access Registration/Permit Program**

The EC continues to support the National Marine Fisheries Service proposal to develop a permit requirement for vessels participating in the Federal directed open access fishery as documented in our November 2023 statement ([Agenda Item E.7.a, Supplemental EC Report 1, November 2023](#)).

### **Chapter 9 B. Update to Discard and Retention Requirements in the Electronic Monitoring Program**

The EC supports the adoption of Option 2 “Update EM discard and retention requirements in regulation to include sablefish and rex sole, and remove California halibut.” This Option would ensure consistency by aligning Federal regulations with Vessel Monitoring Plans.

## **Chapter 9 D. Descending Devices Requirement for Recreational Vessels in Federal Waters**

The EC recommends Option 1, Status Quo. All three states have descending device regulations that are equal to or more restrictive than what is proposed in Option 2. Adding Federal regulations that differ from state regulations would add complexity and confusion to enforcement and fishers.

If Option 2 is selected, the EC cautions against any further regulatory amendments that would require the descending devices to be possessed and used in Federal waters. This would cause potential conflicts between state and Federal regulations.

## **Chapter 9 E. Modify Continuous Transit Limitations for California Recreational Vessels**

The EC reviewed the proposals related to Continuous Transit for California recreational vessels during the offshore fishery. The EC prefers Option 2, suboption 2, which would allow recreational vessels to stop and/or anchor in Federal waters shoreward of the Recreational Rockfish Conservation Area (RCA) line as long as hook-and-line gear was not deployed. The EC recommends against specifying the “50 fm” Recreational RCA line and just state shoreward of the Recreational RCA line” in case the Recreational RCA fathom line changes in the future.

PFMC  
4/08/24