

**GROUND FISH ADVISORY SUBPANEL STATEMENT ON  
BYCATCH MONITORING PROGRAM DRAFT PROGRAMMATIC  
ENVIRONMENTAL IMPACT STATEMENT**

The Groundfish Advisory Subpanel (GAP) held extensive discussions with NMFS contractors Mr. Jim Glock and Mr. Jim Golden. We appreciate the tremendous effort they have made to develop a draft Environmental Impact Statement.

Nevertheless, we are concerned the alternatives listed in Exhibit C.13.a, Attachment 1, will unnecessarily limit the flexibility of the Council to respond to legal requirements to minimize bycatch to the extent practicable. Each of the alternatives contains some of the management tools necessary to achieve the legal mandate. However, those tools do not cut across different fishery lines. For example, one alternative might be appropriate for the trawl fishery, another for recreational fisheries, but none encompass the wide variety of fisheries and bycatch problems that are found under the overall Pacific Coast Groundfish Fishery Management Plan.

The GAP suggests the Council adopt, as a preferred alternative, a new alternative which we have labeled 1A. This alternative should include all of the fishery management tools identified in the draft EIS. It should make clear that the Council's mandate is to minimize bycatch to the extent possible, as required by law, and regulations will be put in place to carry out that mandate. It should stipulate that the tools will be applied on a sector-by-sector basis, in each case using the tools that are most appropriate for the sector. It should stipulate that some tools - such as setting acceptable biological catches (ABCs) and optimum and yields (OYs) or establishing reserves - should be considered as applicable to all fishery sectors.

We cannot adopt a one-size-fits-all approach to bycatch minimization when the types of bycatch, their causes, and their prevention can be radically different among different fishery sectors. Nor do we believe the Council should arbitrarily handcuff itself by making only certain tools available. A flexible approach is the best way to ensure the Council is able to meet the requirements of law while allowing fisheries to continue.

PFMC  
04/08/04