

**GROUND FISH ADVISORY SUBPANEL STATEMENT ON  
PROPOSED CHANGES TO THE CATCH SHARING PLAN AND ANNUAL  
REGULATIONS**

The Groundfish Advisory Subpanel (GAP) examined the proposed alternatives for recreational halibut catch sharing. For the purposes of discussion, and this report, the GAP used the list found in Agenda Item C.1.a - Attachment 2 (Council Newsletter Article). The GAP also asked representatives of the Oregon Department of Fish and Wildlife (ODFW) and the Washington Department of Fish and Wildlife (WDFW) to provide their positions on the proposed alternatives.

The GAP recommends the Council reject items 1 through 4, which are being withdrawn by WDFW in favor of maintaining the status quo. Action will be taken on the state level to accomplish the same objectives.

The GAP recommends the Council accept items 5 and 6, which will enable Oregon fishermen to attain their share of the available halibut resource.

The GAP recommends the Council reject item 7. This effectively re-allocates fish from the spring fishery to the summer fishery, with no clear gains in conservation or economic benefit.

The GAP recommends the Council accept item 8(a), but reject item 8(b), which is consistent with the GAP's position on item 7. In regard to part 8(a)(2), a majority of the GAP recommends the language on a 32-inch minimum size be deleted. The majority believes coastwide consistency in minimum sizes will enhance enforcement. A minority of the GAP suggests that the 32-inch minimum size be retained to prevent high-grading.

The GAP recommends the Council accept item 9, but delete the reference to "no groundfish retention" in order to be consistent with the GAP recommendation on item 12 (below).

The majority of the GAP was unable to reach consensus on item 10. One minority group of the GAP supported this proposal; another minority group opposed it. Conflicting public testimony was also presented.

A majority of the GAP recommends the Council accept item 11 in order to provide coastwide consistency on regulations. A minority of the GAP opposed item 11 due to concerns with potential high-grading.

The GAP recommends the Council accept item 12 with the proviso that the prohibition on retaining groundfish not apply to incidentally-caught sablefish with state bag limits. The GAP notes that this additional modification may require inseason action by the Council in 2005.

Finally, the GAP discussed how trawl mortality impacts are applied to set the allowable harvest for halibut in Area 2A. Several GAP members are concerned the requirement to discard dead

halibut creates additional unnecessary waste, when these fish are already accounted for in setting allowable harvests. Others expressed the concern that allowable harvest is based on prior year mortality levels and that allowing retention of halibut, which otherwise would be discarded, could have the unintended effect of re-allocating from other fisheries. While the GAP reached no resolution on the issue, there was general agreement the Council needed to address how to fairly deal with the whole issue of prohibited species retention, especially given the current discussions on individual bycatch quotas in the context of trawl individual quota proposals.

PFMC  
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