

Mark Worley
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RE: Trawl Catch Shares - Gear Switching

Mr. Phil Anderson
Chair
Pacific Fishery Management Council
7700 NE Ambassador Place, Suite 101
Portland, Oregon 97220-1384

We participate in the West Coast Trawl Catch Share Program. We cannot participate without the Gear Switching provisions. In 2011 we were told our participation in the program was not only allowed but intended. We have invested our time, money, and innovation into this fishery with the express knowledge that our gear type would be allowed in the future.

We are a multi species operation, as are the rest of the program participants. We respectfully remind the council how unfair it is to be regulated out of a fishery *after* making investments.

Removing the gear switching provision in this program is a fundamental change to the entire program. People will have made large investments and commitments that stretch long into the future. This type of change in the program causes financial harm to fishermen who planned to use an alternate gear type. Major changes such as this restriction should not even be a consideration this long after implementation.

We wonder is this suggested limitation even a solution to the grievance? The lease price and sales price of Quota Shares are directly linked to the ex-vessel price paid to the fishermen. There have always been complications between the various gear types. The reasoning behind the council's inclusion of alternate gear is the same as it was at implementation of the program. The original council built this program with Gear Switching provision for a reason that still exists today. Please do not force out the gear types with the lowest bycatch rates.

We appreciate your consideration of our comments.

Thank You
Mark Worley
Lisa Newland
F/V Golden Chalice