



DATE: 10/23/2018

**Mr. Phil Anderson,
Chairman Pacific Fishery Management Council
770 NE Ambassador Place,
Suite 101 Portland, Oregon 97220-1384**

**Re: Agenda Item B.1
Comments on Non-Agenda Items:
October 2018 SaMTAAC Meeting:**

Dear Chair Anderson and Council Members:

Ocean Gold Seafood testified at the October 2018 SaMTAAC meeting that our company wishes to begin a major project to harvest, process and market twenty million pounds of whole dover sole per year along with other related species such as sablefish and thornyheads.

We believe we have enough interested vessels and market interest to begin this frozen sales program on a moderate scale and increase output as we add mechanization and hire additional crew. This would provide us the opportunity stabilize employment and keep our plant and our crew working year-round.

In order to do this project, we need assurance of an adequate supply of sablefish bycatch. Gear switching, which was envisioned to give trawlers more options, has now turned the trawl fishery into a split fishery of trawl and unrestricted fixed gear.

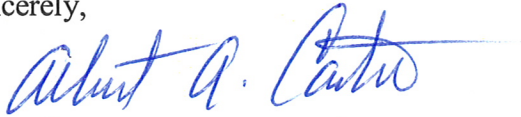
For the redevelopment of groundfish markets it is essential that there be a reliable supply of sable bycatch.

At the SaMTAAC meeting there were multiple public comments. Several from advisors that the GAP #7 alternative for the Sunset of Gear Switching should be analyzed as a stand-alone "bookend" alternative to status quo. The decision was made to incorporate this analysis into a sub option of the Sommer/Dooley alternative that spoke to the elimination of the fixed gear only fishery for ITQ sablefish over a 5 to 15-year time period.

We understand the practical side of doing the analysis this way, however, we firmly believe the analysis of a Sunset provision, whether as a stand-alone, or as an option in an alternative, is critical to the long-term sustainability of the trawl bottomfish fishery and achievement of the ITQ goals and objectives.

Thank you.

Sincerely,



Albert A. Carter
Ocean Gold Seafoods Inc.

Cc: Chuck Tracy
Mike Burner
Jim Seager