



NPFMC comments - NOAA Service Account &lt;npfmc.comments@noaa.gov&gt;

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## Halibut Charter Management

2 messages

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**Capt. Mel Erickson** <gamefish@alaska.net>  
To: npfmc.comments@noaa.gov

Wed, Nov 29, 2017 at 9:28 PM

To: NPFMC  
From: Mel Erickson  
Po Box 1127  
Soldotna ,AK 99669

Subject: 3A Charter Halibut 2018 regulations

I would recommend that the regulations for guided halibut anglers in 3A remain the same as in 2017. The charter fleet has reduced it's harvest of fish in numbers by a large amount and has stayed below its projected harvest in numbers of fish. The guided angler, and charter fleet should get some credit for that.

The only reason that guided anglers exceeded their quota in pounds is because the average size of fish increased a large amount for some unknown reason, & guided anglers should not be penalized for that as the increase in average weight is completely out of their control.

When the guided anglers are regulated in numbers by daily bag limits, & seasonal limits, but then managed by pounds & given its allocation & quota in pounds it is impossible to project or keep the fishery exactly at its quota in pounds. The fleet over the last few years has only been over it's allocation in pounds by 10%, and at or under its allocation in numbers of fish. & in a sport fishery that is incredibly hard to project, these harvest numbers should be considered ok and within range.

The last 2 years in 2012 & 2013 where the fishery was managed under the GHL and under the same regs both years there was still a 200,000 pound difference in harvest each year.

Over the last 4 seasons with each season being more restrictive than the previous, the total actual harvest has remained stable at about 2 million pounds and as stated before always within 10% of poundage allocation, and a large reduction each season in numbers of fish saved and left in the ocean for future breeding & harvest.

The numerous restrictions placed on the guided anglers and charter boats has been severe and very harmful financially, & very difficult in scheduling, not to mention very unfair to the sport angler who needs to access their halibut thru a charter boat compared to the unguided angler who has not contributed at all in sharing the burden of conservation.

I would also suggest that a regulation freeze be placed on the guided angler & Charter industry until the RQE can be fully implemented.

The risk to the halibut stocks would be very minimal if even at all since the numbers in the big picture are so small.

Thank You, Captain Mel Erickson  
30 year Cook Inlet halibut guide.

Alaskan gamefisher

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**Capt. Mel Erickson** <gamefish@alaska.net>  
To: npfmc.comments@noaa.gov

Wed, Nov 29, 2017 at 10:16 PM

To : NPFMC  
From: Mel Erickson  
Po box 1127  
Soldotna AK 99669

Subject: Latent capacity of Halibut CHP

The current charter fleet is to large, and to many charter halibut permits are active for the current allocation to the halibut

charter fleet.

Another concern is many of these permits are not being fished to their full capacity which is and will continue to increase the future harvest potential.

The charter fleet needs to be right sized to not only fit it's current allocation, but also to preserve the future of the charter fleet with no additional restrictions.

The fleet is also operating well below its full occupancy rate and needs to be reduced to match the demand. with the supply of seats.

The goal should be to have a smaller full time fleet of charter boats instead of a large part time fleet.

The ever increasing, and continual restrictions year after year on the charter fleet is really hurting the guided angler, & reducing the quality of the product their buying & leads to a less quality experience to the consumer.

The commercial fishery does not restrict ,and regulate the consumers that then results in a less demand for their product. When the guided halibut sport fishery is restricted it is directed at the consumer of the product that the charter industry is trying to sell resulting in less demand for their product.

Instead of restricting, & regulating the guided angler, & the consumer of the charter industry and reducing demand & price for the product, lets regulate the charter fleet itself with reduced numbers of boats, and permits.

Ways to accomplish this is as follows

- 1: Stop the leasing of non-transferable permits.
2. Retire some, if not all non -transferable permits
3. check to make sure all current permits are operating legal and were transferred legally.
4. Put Individual annual trip limits on all permits based on logbook history since implementation of the CHP.
5. Offer a buy back of transferable permits, that would be paid for thru a tax on remaining CHP's
6. Allow only individuals, & companies with a valid CHP to sell halibut trips. ( as it is now anybody with a website can call themselves a halibut charter and sell a halibut trip)
7. Allow only individuals, & companies with a valid CHP to sub-contract a halibut trip.

Many other professions & industries you can not advertise or sell a product without being qualified or licensed, so why should people with no permit or license be allowed to advertise themselves as a halibut charter and compete with companies that have invested in permits and licenses and are qualified to do so. This is unfair competition to the legal licensed charter businesses who have to compete with unlicensed charter businesses on both the retail level and then again on the sub-contract market.

Thank you, Captain Mel Erickson  
30 year Cook Inlet halibut guide

Alaskan gamefisher



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## Sport Halibut

1 message

**G.Steele Davis** <steele@spiritofalaska.com>  
To: npfmc.comments@noaa.gov

Tue, Nov 28, 2017 at 9:29 PM

Hello NPFMC,  
I hope this finds you all well.

First off I would like to thank all of you that have your heads, and harts in the right place. Thank you!

I'm for limiting us to 1, halibut per day of any size, and stop dinking with the closed days.. What difference dose it make if Tuesday or Wednesday you can't retain halibut? **Our customers are already limited to 4, halibut annually.** (Heck.. Let the people get there \$ worth and retain 2, halibut of any size per day... There only allowed 4, a year now.. After all these are the people's fish.. They do not belong to the commercial sector..)

Ok... Here's my salt box.. I'm appsalutly embarrassed when i go outside and talk to people I don't know, and they ask me what I do for a living. Sheepishly I tell them I'm a Lodge owner, and fishing guide in AK.. They always ask "hows the halibut fishing?" (then tell me there AK fishing story from 20 years ago) I tell them it sucks.. Then of coarse they ask oh why? I then go into my rant about the trawlers devastating by catch, & policy.. Then I tell them that, You NPFMC, along with IPHC, NOAA, and ADF know how bad it is, and that you pick on the smallest user group, so you get the warm and fuzzy, plus you feel like you are accomplishing something..

All you above agencies should be ashamed, and embarrassed for what you are allowing happen to this fishery. If in fact you were doing your jobs, proper you would be working with the smallest of user groups, the sport fishing industry that supports "the people" to get them more fish, and not be so limiting. But NO... Instead your attacking the fleet that supports personal use, the user group that feeds there family's from the fish they catch..

If you were doing your jobs properly, you would be working on ways to combat the devastating troll industry, instead of combating the smallest of all user groups, that the fish truly do belong to.

Don't get me wrong.. I know you all are working hard at what your doing. From what I hear, and see it seems like you all have blinders on and your going in the wrong direction, by picking on the little guy instead of the big guy that is doing all the destruction.

**Go after the devastating fleet for Want & Waste.**

**Tax them on there halibut by catch. Use this tax \$ to support the observer program, and reconstructing of this fishery.** ( as long as the boat is having to pay for the observer, this system will always be corrupt.. the boat shouldn't have to pay for the observer.)

**Mandate that they bring all halibut back to the plant to be processed. But they don't get paid for it.. "Only pay there expenses." Plant still had to buy the fish. Use this \$ to also support the observer program, and reconstruction of this fishery.** (use this fish to feed the military, hospitals, prisons, etc.) ( you yourselves say the mortality rate is 60-90%)

I am over this BS, it's been going on way to long, and the issue is still being over looked... I'm not talking to you as a fishing guide and lodge owner. (because that don't mean squat) I'm talking to you as a individual. A personal use user, that is getting wrongly represented by you, and miss treated by you.

Thank you for your time.

Take Good Care

Standing by

~Steele Davis~  
Owner/Operator  
Spirit of Alaska Wilderness Adventures  
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November 29, 2017

Mr. Dan Hull  
Chair  
North Pacific Fishery Management Council  
605 West 4th Ave, Ste 306  
Anchorage, AK 99501

Dear Mr. Hull and Members of the Council,

Subj: C1 2018 Charter Halibut Management Measures - Final Action

In the Council deliberations leading up to the implementation of the halibut Catch Sharing Plan (CSP) in 2014, the Council recognized that management of the charter allocation would need to be conservative, since the charter sector would not be shut down in season. The Council noticed their intent to manage the charter sector to remain below annual allocations, and at minimum to ensure that over time any overages would be equal to or exceeded by underages.

Despite this commitment, in Area 3A, the charter sector has exceeded its allocation by an average of 0.242M pounds/year or 13%/year. This has happened despite ADFG's best efforts to forecast harvest.

<i>Millions of Pounds 3A</i>	<b>Charter Quota</b>	<b>Charter harvest</b>	<b>Charter Overage</b>	<b>Charter % Overage</b>
2014CSP	1.78	2.066	0.284	16%
2015	1.89	2.094	0.204	11%
2016	1.81	2.093	0.279	15%
2017prelim	1.89	2.093	0.203	11%

**CSP Cumulative Overage  
Since 2014** **0.970**

While several studies are in the works to better control the charter harvest (e.g. annual charter halibut permit renewals and reduction in latent capacity), chronic charter overages are a problem. While the precise cause of the overages cannot be determined, we believe it will be time for the Council to initiate corrective action.

An analogy might help. If you are shooting at the bullseye and your bullets consistently group 13 inches above the bullseye, the quickest way to get on target is to change your aim to point 13 inches below the bullseye.

**For the 2019 halibut season,** we recommend that the Council task the Halibut Charter Committee with identifying management actions that target 100%, 95%, and 90% of the charter allocation.

Thank you for considering our comments.

Regards,



Tom Gemmell  
Executive Director

Alaska Longline Fishermen's Association • Cordova District Fishermen • Deep Sea Fishermen's Union •  
Fishing Vessel Owners Association • Halibut Association of North America • Kachemak Bay Fisheries  
Association • North Pacific Fisheries Association • Petersburg Vessel Owners Association • Sea Food  
Producers Cooperative • Southeast Alaska Fishermen's Alliance • United Cook Inlet Driftnetters Association  
• United Fishermen's Marketing Association • United Southeast Alaska Gillnetters Association

# Halibut; Why Not to Kill the Very Large Ones

July 2015

## ALL ARE FEMALES

"Male Halibut rarely reach a length of three feet." [www.adfg.gov](http://www.adfg.gov). A halibut size/length chart indicates a three foot Halibut weighs about 21 pounds.

"The number of eggs produced by a female is related to its size. A 50-pound female will produce about 500,000 eggs, whereas a female over 250 pounds may produce 4 million eggs." [www.iphc.int/.../tech0022](http://www.iphc.int/.../tech0022) A halibut size/length chart indicates a 50 pound Halibut is about 47 inches and a 250 pound Halibut is about 78 inches.

## TASTE

"30-45 taste the best and fight the best. I don't throw any back but have noticed the ones over 100# I have got the meat seems to be drier and also it is not as flakey, sometimes they have belly worms and seems chewier." [www.lfish.com](http://www.lfish.com)

"The big ones are certainly edible, but the little ones have a better texture. Anything over about 50-60 pounds start to get grainy and more chewy. Steaking the fillets of the bigger fish can help with this, but those little 15-20 pounders are just plain delicious!" [www.lfish.com](http://www.lfish.com)

"I prefer the smaller ones myself: ie. the under 50# class for table fare. I have caught the 100#ers' and just don't like the texture. Fun to catch but for me give me the smaller chicken any day of the week." [www.lfish.com](http://www.lfish.com)

"We had one 325 pounder and to this day the guys that kept it said they would never keep another one." [www.lfish.com](http://www.lfish.com)

"Why would you keep a large fish like that????? Can you eat the big ones??? If not why not release them to make more??? Hate to see trophy fishing for retention." [www.lfish.com](http://www.lfish.com)

"Throw the big ones back Andy.....The Alaskan halibut fishery is going to end up like the sturgeon fishery on the Columbia." [www.lfish.com](http://www.lfish.com)

"No, once they reach the 200 pound limit, they are no longer edible. Best to just keep them for pictures, then toss all the meat in the trash." [www.lfish.com](http://www.lfish.com)

## SAFE TO EAT?

The level of Mercury present in the flesh of the large female Halibut is of concern to scientists at the International Halibut Commission, (IHPC). In Canada the level of concern is any sampling with a rating of 0.5 parts per million, (ppm). In the USA the level of concern has been established at 1.000 ppm. Here are some IHPC testing results on Area 2C Halibut by size:

- Under 20 lbs.: 0.225ppm.

(2).

- 41-100 lbs.: 0.406 ppm.
- Over 100 lbs.: 0.883 ppm.

It is apparent that as the Female Halibut ages and grows in size, she accumulates more Mercury. At the 100lb+ mark the 0.883 reading would exceed the Canadian safe standard of 0.500 ppm. It would appear likely a 200 lb. Halibut would exceed the USA standard of 1.00 ppm.

The IHPC will be conducting further sampling of the larger Halibut. The sport catch is particularly worrisome as that fish is taken home and consumed by a family; it is not butchered and sold of to a myriad of consumers as in the commercial fishery. There is greater potential of harm in concentrating the contaminated catch within a single family.

The purpose of this paper is to raise awareness of this issue amongst the sport fishermen; it might be better to photograph and release the large female Halibut.

Norm Carson  
Pelican Charters