

**Subject:** CDQ halibut for Norton Sound Communities  
**From:** Robin Thomas <gudyul@gmail.com>  
**Date:** 1/21/2015 9:50 AM  
**To:** npfmc.comments@noaa.gov, Simon Kinneen <simon@nsedc.com>, frank <mcf Frank54@hotmail.com>

Dear board members,

I am a Norton Sound resident and CDQ halibut fisherman under the management of the CDQ group NSEDC, Norton Sound Economic Development Corporation. In 2014 our quota was reduced by 50% . Two communities Savoonga, on St. Lawrence Island, and Nome, hub for fifteen Norton Sound Communities, process this quota. Other Norton Sound community members fish halibut out of Nome and Savoonga as well. The CDQ halibut fishery is in the fall after Norton Sound king crab and salmon and usually includes pacific cod by-catch. As a Nome halibut fisherman, I travel 20-50 miles to look for halibut on the shoals near Sledge Island and King Island. This fishery takes place in the Bering Straights between fall storms and separates the men from the boys. Actually I have had a few women deck hands on my boat as well.

Not all deck hands last more than one trip as sea sickness overcomes the brave at heart. I have had as many as 20 deck hands trained on my vessel since the inception of our halibut fishery in late 1990's. Being the last fishery of the season before freeze up , this halibut fishery is where the bills have been mostly paid off for the summer operations and finally I am able to put some money in the bank for the winter. We actually have a small winter king crab fishery as well from February through April in the Norton Sound area.

All of the small Norton Sound fisheries from spring herring to fall halibut and cod are interconnected, the profits from one small fishery used to gear up for the next. For the halibut fishery to be severely restricted by reduced quota I have had trips limited to 500-1000lb so as not to exceed quotas. Having to travel 50 miles to the fishing grounds only to return 50 miles without filling the boat has proved demoralizing and anti productive. Last year with Savoonga (4D) taking half of the 50,000 lb, Nome's(4E) halibut season was cut short and we missed out on the late September run where the fish gather to return south at the advent of cold weather. This fall run is the time all the Norton Sound halibut fishers eagerly wait for. Historically there has been enough halibut quota to keep the Nome fleet and Savoonga fleet active till freeze up. On a good year the combined catch is 100-150,000LB. It is my hope that the quota may be kept at 125,000lb for Norton Sound CDQ halibut 4E and 4D. The 4E and 4D line is permeable, meaning quota from 4D may be fished in 4E.

Of note, CDQ cod may be fished by CDQ groups, with new regulations, as long as there is halibut quota for the incidental halibut or visa versa. There has been discussion by NMFS enforcement of making a 46 foot exemption for CDQ vessels. This would be good as this fall fishery is out in the rough waters of the Bering Straights as well as Norton Sound. There has been discussion as well about LLP,s and limits to participation in the Norton Sound king crab fishery. As a Norton

Sound crabber and halibut fisherman , I would like to see the 46 foot exemption( without LLP) include, as well, open access Norton Sound king crab and CDQ Norton Sound king crab for those CDQ fishers who have a history of fishing CDQ halibut. This way the same vessel may be fished in both fisheries consecutively.

Thank you for your kind attention to this matter.

Robin Thomas  
FV Stephanie Sue  
Nome Alaska