There are unintended consequences on the IPHC/federal IFQ Halibut fishery in the way this reg change may be implemented and/or interpretted.

When it notes "in the same trip", halibut fishers who start a trip in state waters but ends it in Federal waters with some possible retained federal IFQ sablefish (not previously caught or retained in State waters) then they are considered to be in violation.

If this is the case then halibut fishers are negatively impacted from prosecuting their fishery in a safe and efficient manner.

Please allow this ACR so it can be deliberated more among all the stakeholders.

Regards, Rhonda Hubbard