1. **What is the definition and objective of the proposal?**
   Implement harvest control measures to restrain guided sport halibut harvest in area 2C to domestic harvest limits (guideline harvest level of .788 million pounds).

   The guided sport industry has exceeded its 2C domestic harvest limit every year starting in 2004. Cumulative overages are over 4 million pounds and threaten to undermine the rebuilding potential of the 2C halibut stock. The North Pacific Fishery Management Council’s halibut Catch Sharing Plan is not scheduled for implementation until 2012. Unless the IPHC implements harvest control measures the guided sport industry will again exceed its 2C domestic harvest limit. Harvest control limits could include: a maximum size limit; a delayed season start date; or other measures that can be predicted to effectively control guided sport harvest to the domestic harvest limit.

2. **Impacts: Describe who you think this proposed change might affect (include fishers, processors, agencies, and the public).**
   The proposal will affect all who depend on the halibut resource for sustenance or livelihood (subsistence, sport, guided sport, commercial fishermen and processors) by ending the chronic resource overharvest by the 2C guided sport sector.

2a. **Who might benefit from the proposed change?**
   Everyone who depends on a healthy and productive halibut resource will benefit. The regulatory system will regain some lost credibility caused by years of ineffective guided sport management in multiple regulatory areas. Also, the managing agency (IPHC) will benefit from controlling guided sport harvest to the domestic harvest limit, or GHL:

   "The lack of compliance with the GHL targets will exacerbate the present conservation problem in Area 2C. Estimates of exploitable biomass for Area 2C have decreased markedly in recent years and the lack of adherence by the charter fishery to the targets established by the Council in turn frustrates the..."
ability of the IPHC to meet its management targets. The increased charter catch will delay the rebuilding of the Area 2C resource, and increase the harvest rate well above the 20 percent level we believe is appropriate.”

(September 19, 2008 IPHC letter to the NPFMC)

2b. Who might suffer hardships or be worse off?
In the short term, guided sport operators may suffer, but failure to protect the resource from overharvest will ultimately bankrupt all who make their living and feed their families from the halibut resource—including members of the guided sport industry.

3. Are there other solutions to the problem described above? If so, why were they rejected?

The National Marine Fisheries Service could implement the Catch Sharing Plan in 2011 that was approved by the NPFMC in October 2008. The Halibut Coalition has met multiple times with NOAA Assistant Administrator and the NMFS Regional Director to urge timely implementation. At this time NMFS does not intend to implement the CSP until 2012.

4. Please attach any other supporting materials. All items submitted by November 10, 2010 will be considered at the IPHC Annual Meeting. Remember to include contact information and signature.