

North Pacific Fishery Management Council

Dan Hull, Chairman
David Witherell, Executive Director

Telephone (907) 271-2809



605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Fax (907) 271-2817

Visit our website: <http://www.npfmc.org>

ADVISORY PANEL MINUTES

February 6–9, 2018

Seattle, Washington

The Advisory Panel met Tuesday, February 5 through Friday, February 9, 2018 at the Renaissance Seattle Hotel in Seattle, Washington. The following members were present for all or part of the meetings (absent members are ~~stricken~~):

Carroll, Shannon	Johnson, Jim	Scoblic, John
Christiansen, Ruth	Kauffman, Jeff	Stevens, Ben
Cochran, Kurt	Kwachka, Alexis	Upton, Matt (Co-Vice Chair)
Donich, Daniel	Lowenberg, Craig (<i>arrived 2/8</i>)	Vanderhoeven, Anne
Drobnica, Angel (Co-Vice Chair)	Nichols, Carina	Weinstein, Samantha
Gruver, John	O'Donnell, Paddy	Weiss, Ernie (Chair)
Hayden, Natasha	Peterson, Joel	Wilt, Sinclair

The AP approved the minutes from the December 2017 meeting.

Election of Officers

The Advisory Panel elected Ernie Weiss as Chairman and Angel Drobnica and Matt Upton as Co-Vice Chairs.

C1 BSAI Crab Specifications/SAFE

The AP recommends the Council approve the OFL (.43 ml lbs.) and ABC (.35 ml lbs.) for Norton Sound Red King Crab as recommended by the Crab Plan Team and SSC.

Motion passed 20-0

C2 Small Sideboards

The AP recommends the Council select Alternative 2 (as identified in Tables 2-1, 2-2, 2-3, and 2-4 in the RIR) including Option 1 (removal of the sideboard limit on AFA catcher/processors for Central Aleutian Islands Atka mackerel) as the preferred alternative for agenda item C2 Small Sideboards.

Motion passed 20-0.

Rationale:

- *The intent of this action is to lessen an administrative burden and simplify the annual specification process, not to create a new fishery or another race for fish. In the case that stocks increase enough to support a directed fishery, sideboard limits may need to be instituted again.*

C3 Chinook PSC Limits

Motion #1 - The AP recommends that the Council consider modifying the staff proposed Purpose and Need statement as follows:

The Magnuson-Stevens Act (MSA) National Standards require the Council to balance the objectives of achieving optimum yield, minimizing bycatch, and minimizing adverse impacts on fishery-dependent communities. Chinook salmon PSC taken in GOA trawl fisheries is a resource concern, and the Council has taken action to set hard cap PSC limits that are below the incidental take amount that would trigger reconsultation under the Endangered Species Act (ESA). Attainment of a PSC hard cap closes the trawl fishery. Since the 2015 implementation of Chinook salmon PSC limits for the GOA non-pollock groundfish trawl CV sector, the fishery has continued to display variable levels and unpredictable timing of salmon encounter. Potential closures and PSC encounter rates that vary from year-to-year or even week-to-week create uncertainty for fishery participants, which in turn can ~~exacerbate a "race for fish,"~~ make business planning more difficult, or directly lead to forgone harvest opportunities. Those outcomes adversely affect trawl harvesters, crew, processors, and GOA coastal communities.

Relative to what was available when the Council established the PSC limits, new information about the resource and the fishery's rate of salmon encounter has been gathered from salmon genetic identification studies and the expansion of observer sampling onto smaller trawl vessels. Meanwhile, the ~~non-Rockfish Program GOA trawl fisheries fishery~~ will continue to operate under a limited access management structure where harvesters must compete for a share of the available catch without formalized cooperative tools to ~~best minimize and utilize~~ PSC. ~~As a result, individual actions to avoid PSC often confer an individual competitive disadvantage. Voluntary collective action is costly to organize, and agreements to stand down from fishing to minimize PSC have not always held.~~

The proposed action would reconsider Chinook salmon PSC limits for the GOA non-pollock ~~non-Rockfish Program~~ trawl CV sector and/or the Central GOA Rockfish Program CV sector. Alternatives to increase PSC limits are offered in light of new information and multiple years of experience fishing under constraining hard caps ~~for these fisheries in a limited access fishery~~ with variable and unpredictable PSC rates. The action would not modify other existing features of the GOA Chinook salmon PSC limits for non-pollock trawl fisheries such as PSC rollovers from the Rockfish Program CV sector to the limited access CV sector, and NMFS's ability to make in-season Chinook salmon PSC limit reapportionments between certain trawl sectors. The action seeks to find the most appropriate PSC limits for ~~these fisheries this fishery~~ by considering historical PSC levels and providing a margin that accommodates expected ~~high~~ variability, while remaining within previously established outer bounds for annual GOA-wide PSC levels that are not expected to jeopardize the Chinook salmon resource.

Motion passed 19-2.

Motion #2 - The AP recommends that the Council request the analyst add the following information and revise the options ~~for inclusion in another iteration of~~ the initial review draft document as noted below. ~~Once the document is revised another version of the initial review draft release it for public review. [Am to motion passed 11-9 with 1 abstention.]~~

- Include a table and figure that shows all the chinook stock of origin data by year and by fishery—rockfish, arrowtooth, and pollock.
- Provide an example of how the discussion on page 66 regarding adult equivalent plays out for an immature bycaught chinook with regards to adult equivalency.
- Provide examples of contributors for the spikiness of the bycatch data—influence of basket sampling versus full census counts. For basket sampling, provide a better explanation of how basket samples function—the variance created by sample size, number of samples within a haul, and number of hauls sampled on an individual trip and the resulting salmon estimate. Show the actual spikiness of the estimate by matching each spike event with the actual number of salmon observed versus the Catch Accounting System (CAS) salmon estimate.
- Discuss how hatchery policies and improvements in rearing, affect hard cap bycatch management and the potential difficulty of choosing the appropriate cap level. Include a discussion of Washington State’s proposed policy of increasing hatchery production as a way of feeding endangered Puget Sound orcas and its effect on GOA trawl bycatch.
- Remove fishery rationalization from table 9 (reasonably foreseeable future actions).
- Revise the alternatives and options as follows (underlined is new):

Alternative 1: Status Quo

Alternative 2: Increase the Chinook salmon PSC limit for the GOA non-pollock non-Rockfish Program CV sector by:

Option 1: 1,000 fish

Option 2: 2,000 fish

Option 3: 3,000 fish

Option 4: Straight rollover (base cap minus the actual take for that year) of all unused Chinook over (a) one-year, or (b) two-year period added to the base cap. Remove the incentive buffer for the fishery. The annual cap will never go below the base cap amount. (Option 4 can be selected in combination with Options 1 - 3 or as a standalone option.)

Alternative 3: Increase the Chinook salmon PSC limit for the Central GOA Rockfish Program CV sector by:

Option 1: 300 fish

Option 2: 600 fish

Option 3: 900 fish

Option 4: Straight rollover (base cap minus the actual take for that year) of all unused Chinook over (a) one-year, or (b) two-year period added to the base cap. The annual cap will never go below the base cap amount. (Option 4 can be selected in combination with Options 1-3 or as a stand-alone option.)

Motion passed 18-3.

Rationale in Support:

- *The changes to the language in the purpose and needs statement provides clarification on the fisheries of focus in the action.*
- *In trying to balance the needs of the Southeast fishermen and the trawl fleet, the underlying uncertainty regarding the degree of impact on SE and PNW stocks and management activities,*

along with the analysis' suggestion that this would not have a substantial effect on such, moving this action forward seemed appropriate.

- *Chinook bycatch caps have been a frequent management issue since the Council established the initial caps. This suggests that the caps may not be set at the appropriate level, as does updated data regarding stock of origin and bycatch usage since the initial Council decision.*
- *The pending release of 10-20 million hatchery Chinook creates additional uncertainty as to the efficacy of the current caps.*
- *A better understanding is needed on the status of the hatchery programs in BC, PNW and Alaska. Information on the background of the programs and how hatchery fish are considered in the Pacific Salmon Treaty and incidental take under the ESA would help determine the value of hatchery fish in future bycatch discussions.*
- *The Council is currently considering action items under the observer and EM projects agenda item that will provide the Council and AP with an opportunity to prioritize efforts to improve sampling and monitoring in the trawl fleet.*
- *The Western GOA history was based on incomplete observer data of the under 60' trawl fleet and resulted in an underfunded cap. The original cap was set in the context of a future catch share program that would have given the non-pollock trawl fleet tools to manage more effectively under a constraining cap.*
- *Increasing PSC limits will provide the fleet with necessary flexibility in the context of the limited tools available to minimize bycatch*
- *A hard cap is not a target, the fleet will be constrained before the limit is reached and will still have to work hard to stay under a PSC limit, even if increased*
- *The alternatives to increase PSC will keep the fleet under the 40,000 limit that would trigger reconsultation under the ESA*
- *Data limitations make it very challenging to determine the potential beneficial impacts of any salmon savings to any individual river system. Absent better sampling data, performing an exercise to try to answer this question would entail a lot of assumptions and be of little value.*
- *An example AEQ calculation would help to illustrate that one fish in the GOA translates back into something far less than one fish to any river system.*
- *The next iteration of the analysis should expand on how sampling methods may contribute to the spikiness in Chinook bycatch accounting*
- *In a changing climate, the boxes that the Council has managed under may need to be drastically overhauled if we want viable fisheries and communities in the future. There are a lot of unanswered questions about how best to respond to a conservation concern in one fishery under a different management authority when the action taken may not be responsive and could come at a high cost to another fishery.*
- *We should be exploring ways to provide more flexibility under the existing caps as an alternative to PSC cap increases. It is valuable to maintain PSC increase options for purposes of comparison to the new rollover options in the next iteration of an analysis.*
- *The new rollover provisions may have biological implications that warrant another iteration of initial review before being released for public review.*

Rationale in Opposition:

- *The AP received public testimony and many letters expressing concern about salmon stocks, many of which are at historical lows and well under escapement goals. Salmon fleets, both directly targeting Chinook and those with incidental catch will be facing restrictions in time, area and gear to avoid Chinook over many years. These fleets are small with limited opportunities for diversifying into other fisheries and the economic impacts on commercial, sport and personal use fishermen, crew, processing plants and communities are anticipated to be very significant.*
- *It is difficult to move forward with this action without being able to fully assess the impacts and provide stakeholders with a degree of confidence that increasing PSC caps will not measurably impact salmon stocks.*
- *This action is in direct contradiction with the management restrictions that the SE salmon gear groups experienced at the Board of Fish meeting two weeks ago, making the timing and optics of this action very challenging.*

Rationale in Opposition to the Amended Language in Motion #2

- *The list of additional items in the AP motion can be incorporated in the analysis and sent to public review. The Council maintains the flexibility to send any relevant information back to the SSC for feedback at any stage of the process.*

C4 IFQ Medical Lease Provision

The AP recommends the Council develop a purpose and needs statement **that considers the original intent of the halibut sablefish IFQ Program and the medical lease provision.**

[Amendment to add bold/underlined language in prior sentence AND delete final sentence of entire motion (below); motion passed 19-0.]

[Amendment to strike 1st sentence of bolded language ending with "IFQ Program", failed 9-10.]

The AP recommends the Council move forward for analysis the following changes to the medical lease provision for the IFQ program:

Alternative 1: No Action

Alternative 2: Define "Certified Medical Professional"

Option 1: Replace current definition with a single, broader definition of certified medical professional, such as "Health care provider" as follows:

An eligible health care provider is authorized to practice by the State and performs within the scope of their practice to diagnose and treat as defined by applicable Federal, state, or local laws and regulations. A health care provider is authorized to practice medicine by Federal, state, or local laws and regulations. ~~A health care provider outside the U.S. and its territories licensed to practice medicine is included in this definition.~~

[Am to strike last sentence; motion passed 11-8.]

Option 2: Define a Certified Medical Professional as all or a sub-set of those individuals defined in the Social Security Act Sections 1861(r) and 1861(s).

[Am to strike bullet #6 on page 11 which refers to SSA above in Option 2, #6 in particular addresses same issue as noted in previous amendment; motion passed 11-8.]

Option 3: Require that the Application for Medical Transfer form require submittal of the medical professional or health care provider's certification or the equivalent. (Option 3 can be selected in conjunction with Option 1 or 2.)

Alternative 3: Revise federal regulations to allow the medical transfer provision to be used for any medical reason for:

Option 1: 2 of 5 rolling years

Option 2: 3 of 7 rolling years

Option 3: Establish a limit on number of years medical transfer provision may be utilized

Suboption 1: 2 years cumulative

Suboption 2: 4 years cumulative

Suboption 3: 6 years cumulative

a) Transfers from previous years would count towards the limit

b) Only transfers after implementation of new rule would count towards the limit

Option 3 can be selected alone or in conjunction with Option 1 or 2.

~~The AP also asks that staff evaluate other programs such as state limited license programs or crab IFQ medical lease provisions for comparison and possible guidance in this topic. [Amendment to strike this sentence (which was part of the first amendment above); motion passed 19-0.]~~

Final motion as amended passed 19-0.

Rationale:

- *When identifying alternatives for an initial analysis, it is important to articulate the issue (potential purpose and need) of the action to be addressed.*
- *Utilization trends of medical leases in the IFQ program suggest that there is potential gaming occurring in the system. Alternatives need to be explored to close loopholes and ensure that the program is being used as intended.*
- *Providing a definition of medical provider will help to streamline agency administrative burden and interpretation. Qualified providers should be limited to those certified in the United States, as the IFQ program is a US fishery. Recognizing foreign medical providers under the program provides additional opportunity for gaming the system and illegitimate claims. Exceptional cases could be handled through a petition process.*
- *Revising regulations to allow medical leasing for any medical condition on a rolling basis (e.g., 2 of 5 years) may still offer incentive to game the system.*
- *Instituting a lifetime cap on the number of total years that an individual can lease their IFQ, acknowledges that an IFQ holder may experience multiple isolated medical conditions throughout their career while identifying a reasonable limit that would trigger movement of quota back into the market.*
- *Before exploring other programs that utilize medical lease provisions for potential guidance on this issue, a necessary first step to focus on is to get more detailed information and analysis*

on both the original intent of the halibut and sablefish IFQ program as well as the medical lease provision established in 2007.

Minority Report: A minority of the AP disagreed with removing foreign medical personnel provisions at this point in the process. Several scenarios were discussed (such as a vacationing IFQ holder who was not medically stable for transport to a US physician or an IFQ holder seeking cheaper medical care in Mexico). The minority felt that further analysis was warranted before eliminating this option.

Signed by: Anne Vanderhoeven, Ruth Christiansen, John Scoblic, Daniel Donich, Jim Johnson, John Gruver, Paddy O'Donnell, Samantha Weinstein

C5 IFQ Beneficiary Designation

The AP recommends the Council develop a purpose and needs statement and alternatives for analysis to address the IFQ Beneficiary Program and the definition of an immediate family member.

The AP supports further analysis in considering permitting transfers to the estate in addition to spouses and immediate family members.

The AP supports further analysis in considering a requirement of the QS/IFQ Beneficiary Designation form **as a prerequisite to annual IFQ being issued.**

[Amendment to motion passed 21-0.]

Alternatives to redefine “immediate family member”:

Alternative 1: Use the definition of immediate relative that the U.S. Office of Personnel Management (OPM) employs. For their purposes an “immediate relative” is an individual with any of the following relationships: (1) spouse, and parents thereof; (2) sons and daughters, and spouses thereof; (3) parents, and spouses thereof; (4) brothers and sisters, and spouses thereof; (5) grandparents and grandchildren, and spouses thereof; (6) domestic partner and parents thereof, including domestic partners of any individual in 1 through 5 of this definition; and (7) any individual related by blood or affinity whose close association with the employee is the equivalent of a family relationship.

Alternative 2: Use the definition of immediate family member for the Federal Family Medical Leave Act (FMLA) of 1993. That definition would include a: (1) spouse, (2) son, (3) daughter, or (4) parent (as defined by FMLA).

Motion as amended passed 21-0.

Rationale:

- *This action is intended to offer clarity on the definition of a beneficiary in the context of the IFQ program and to provide a greater level of consistency between the program and traditional estate planning.*
- *A very small percentage of people have completed the form. While the utility of a beneficiary designation form is limited, requiring it prior to IFQ issuance may help the agency in dealing*

with ownership succession in the case that a will has not been prepared or an identified beneficiary has not been otherwise formally documented.

- Under the beneficiary lease provision, there is no regulatory definition of ‘immediate family member’. This is an administrative issue for NMFS.

C6 IFQ Committee Report

AP Motion #1

The AP recommends the Council develop a purpose and need statement that captures the quota share access issues raised by certain second generation IFQ fishermen and identifies potential alternatives to address these concerns. The AP recommends that the Council initiate a discussion paper on the following items: ~~elements and options~~:

[Amendment #1 to add “certain”; motion passed 20-0.]

[Amendment #3 to strike sentence and add “items” in initial paragraph above; motion passed 20-0.]

[Amendment #2 to strike Sea Time Recency Requirement elements and options and replace with leading paragraph; motion passed 20-0.]

Modification to the Sea Time Recency Requirement: Evaluate whether a sea time recency requirement amendment to the IFQ program for those individuals who own B, C or D class shares of halibut or sablefish would better meet the goals of the IFQ program.

Sea Time Recency Requirement

~~Element 1: Establish a sea-time recency requirement for all halibut and sablefish catcher-vessel IFQ holders in the B, C and D vessel classes.~~

~~Option 1: require TEC renewal every 5 years (renewal criteria defined in Element 2 below)~~

~~Option 2: require TEC renewal every 10 years~~

~~Element 2: Establish an annual sea-time recency requirement for all halibut and sablefish catcher-vessel IFQ holders in the B, C and D vessel classes. Define sea time recency as actively participating in a harvesting capacity in (a) a U.S. fishery; or, (b) the Alaska IFQ halibut or sablefish fisheries at least:~~

~~Option 1: 10 days annually~~

~~Option 2: 20 days annually~~

~~Option 3: 60 days over the course of 3 years~~

Allow blocks to be divisible at point of sale (create more small blocks). Resulting blocks would retain blocked status except for additional unblocking and sweep up allowance at subsequent points of sale. The AP notes that the NMFS entry level loan program is not facilitating entry level as intended. The AP recommends the Council request NMFS Financial Services work with the IFQ Committee and other industry stakeholders to develop options and actions that improve loan program function to achieve the Council’s entry level objectives.

Finally, AP recommends the IFQ Committee be reconvened to review and comment on the discussion paper resulting from this action.

Final motion as amended passed 20-1.

Rationale in Support:

- *At this stage in the process, it seems premature to pick alternatives and options for any of the proposals.*
- *Given that changes to the sea time recency requirement could prevent people from entering the fishery, it makes sense to have more analysis before numbers and restrictions are put forward.*
- *The 20-year review of the halibut and sablefish IFQ program highlighted issues with the program.
in meeting its original objectives in achieving an owner/operator fleet, ensuring entry level opportunities and rural access.*
- *The sea time requirements that were established in the original formation of the IFQ program may need to be updated to reflect the goals of the program.*
- *One of the unforeseen consequences of the IFQ program is that quota shares are being treated as stock options by some who were initially recipients or who earned the sea-time requirement to obtain a Transfer Eligibility Certificate. Currently, there is no recency clause to ensure that active fishermen, instead of investors are buying quota shares.*
- *The TEC requirements lack any reference of being an owner operator or active fisherman; simply qualifying to purchase quota or being initially allocated quota does not achieve the program goal of owner/operator.*
- *Allowing the formation smaller blocks through divisibility could increase access to the IFQ fishery and aid in facilitating new entrant purchases. A 'sweep-up' provision exists, but there is no regulation in place which would allow the opposite movement. Creating smaller individual blocks could help mitigate high entry costs and allow for an increase in the number of entry level participants in the IFQ fishery.*
- *The Federal loan program is underutilized and should be evaluated for potential barriers (such as the requisite 40% down payment) and opportunities for restructuring.*
- *The IFQ committee is made up of experts in the field who are best equipped to evaluate how potential changes in the program could best achieve the goals of the program. The committee should be reconvened following the completion of the discussion paper and allowed an opportunity to offer recommendations.*

Rationale in Opposition:

- *The Halibut Sablefish IFQ Program has not met some of the fundamental goals laid out at the beginning of the program. This motion does not go far enough to achieve identified issues in the 20-year review.*

AP Motion #2

The AP recommends the Council direct the IFQ Committee to evaluate Proposals 1 and 2 (p. 15 & 16) under the “Access to Quota” category and Proposal 4 (p. 9) of the “Hired Skipper & Owner-Operator Eligibility” category of those submitted to the IFQ Committee which are designed to create explicit entry level opportunities with a path to ownership in the halibut and sablefish fisheries for owner/operators, crew members, and residents of coastal and rural communities.

Motion passed 13-8.

Rationale in Support:

- *This motion is intended to provide the IFQ committee an opportunity to further explore potential elements to mitigate the impacts on communities and crew from the Hired Skipper and Owner-Operator provisions in the IFQ program.*
- *The motion identifies specific proposals submitted to the committee with the intent that those proposals act as a starting point for discussion and be revised and further developed to reflect the committee members expertise and input. A desired outcome is a formal recommendation or decision point from the Committee.*

Rationale in Opposition:

- *The halibut resource is fully subscribed; funding an entity from quota increases would take away from individuals in the form of fish and money.*
- *It is unfair to take fish from hired skippers or crew who have been following the rules and working under the current system.*
- *The AP received overwhelming public testimony in opposition to proposed program changes.*
- *There was no consensus from the IFQ Committee on the proposed program changes.*
- *The IFQ Committee has previously weighed-in on “Owner-Operator Eligibility” issues.*
- *This action could severely disrupt long established family business operations and estate planning.*

AP Motion #3

The AP recommends the Council initiate a discussion paper to lift the halibut quota block limit for the CQE entity in Adak for area 4B quota.

Motion passed 21-0.

Rationale:

- *This was one of the only recommendations forwarded by the IFQ Committee*
- *The CQE in Adak is limited to 15% of area 4B quota holdings and 10 blocks. The size of area 4B blocks (8,000 or under) prevents the CQE from ever reaching their ownership cap, limiting their ability to meet program goals of qualifying and assisting residents with ownership of quota.*

D1 Arctic Fishing

The AP recommends the Council take no further action at this time.

Motion passed 21-0.

Rationale:

- *This is a well done informative paper that provides useful information about management measures for exploratory fisheries.*
- *There is no need to amend the Arctic FMP; no one is requesting it at this time.*
- *Arctic nations and fishing nations recently agreed to a precautionary management regime in the Central Arctic Ocean which mirrors the precautionary approach put in place in the Arctic.*

D2 Observer/EM

AP Motion #1

The AP recommends the Council next prioritize the development and implementation of electronic monitoring aboard trawl catcher vessels. To help facilitate this goal, the AP recommends the Council reconstitute the Electronic Monitoring Workgroup to include representatives from the BSAI and GOA trawl CV fisheries.

Motion passed 21-0.

Rationale:

- *Given that the fixed gear EM program is almost fully operational, NMFS and the Council are asking for input and guidance on the next priority for EM development.*
- *The development and use of electronic monitoring systems is recognized as an efficient, accurate, and cost-effective tool for a variety of fisheries management purposes and its use for compliance objectives combined with retention requirements on trawl CVs has been discussed by and of interest to the Council and OAC for a few years.*
- *The need for precise and timely data collection in the WGOA pollock trawl fishery is an acknowledged priority for the Council.*
- *Current pollock CV electronic monitoring activities occurring (voluntarily) in the Bering Sea for 2018 will provide valuable information upon which to build EM development for compliance monitoring purposes in both the BSAI and GOA. Thus, it is timely to devote staff, Council, and Workgroup efforts toward trawl EM development.*
- *While the current EM Workgroup may need one more meeting, it makes sense to start to move that membership into the OAC since one of their primary decisions will shift into how to use the observer fee between EM and observers. This will allow a new focus for an EM workgroup relative to trawl.*

AP Motion#2 on Fee Analysis

The AP supports the analytical approach, purpose and need and alternatives to the fee analysis identified in the February 2018 paper "Raising the Partial Coverage Observer Fee Planning Update". The AP supports analysis of the fee increase based on reference points for each sector, which should consider minimum thresholds and those thresholds needed to meet Council objectives. This analysis needs to be reviewed by the OAC subgroup before initial review.

The AP recommends the OAC and the OAC subgroup review the analytical approach at their next meeting.

Motion passed 21-0.

Rationale:

- *It is important to consider allowing flexibility in coverage rates that are responsive to variables in fisheries and reflect utilization of EM so to minimize management restrictions.*
- *Continued development of reference points is important to reflect distinctions in gear and sampling coverage.*
- *There is general support for looking closer at the observer fee structure, but some concern over retaining Alternative 3 in future iterations. Some AP members feel that the cost of observer coverage should not be linked to the rate of coverage of any sector and instead should continue to be evenly apportioned.*

E5 Staff Tasking Motion on OCS Oil and Gas Leasing

The AP recommends that the Council send a letter to the Department of the Interior during the comment period on the 2019-2024 National Outer Continental Shelf Oil and Gas Leasing Draft Proposed Program. Consistent with the requests expressed in the letters from the Governor of Alaska and Alaska's Congressional Delegation, the letter should support the removal of potential sales in the Hope Basin, Norton Basin, St. Matthew-Hall, Navarin Basin, Aleutian Basin, Bowers Basin, Aleutian Arc, St. George Basin, Shumagin, Kodiak, and Gulf of Alaska from the Draft Proposed Program. #fisheriescomefirst

Motion passed 20-0.

Rationale:

- *Alaska's oceans are of vital importance to commercial, recreational, and subsistence activities of the residents and communities of the State and the nation.*
- *Oil and gas activities can put commercial, recreational, and subsistence fisheries at risk and can threaten the tremendous value they bring to the State of Alaska and our nation.*
- *Oil and gas leasing can threaten Alaska's reputation for healthy fisheries and clean waters on which the state's seafood marketing relies.*
- *Ecosystem threats to fisheries are many; it makes sense to ensure that controllable risks are minimized.*