



ENVIRONMENTAL DEFENSE FUND

finding the ways that work

Adaptive Management Program Development Workshops – Overview

After the November 2008 Council meeting it was clear that the Adaptive Management Program (AMP) had strong support from the Council, although the details remained nebulous with different people and groups envisioning that it would be used to meet different objectives. Both the substance of the program and the process were largely undefined. With the goal of clarifying and developing potential parameters and details of the program, Environmental Defense Fund (EDF) convened a series of meetings with participation from fishermen, processors, environmental organizations, states, and Council staff.

Over three meetings participants made an effort to craft four options for the AMP focused on achieving processor, conservation, state and fishermen desires respectively. Of course, there was significant overlap in the goals and objectives between several of the options. No effort was made to reach consensus on any of the substantive options, and participants were asked to help other groups craft the best possible option to achieve those particular goals and objectives.

The goals identified by workshop participants included:

- Maintaining existing processing capability,
- facilitating long term business planning,
- increasing the long term value of groundfish production,
- providing an equitable geographic dispersion of quota and fishing effort,
- providing certainty to current participants,
- minimizing adverse impacts,
- creating incentives for sustainable/best fishing practices, providing stability for fishing communities,
- enabling the program to react to unforeseen circumstances,
- facilitating new entrants in fish processing, and
- enabling an economically stronger trawl fishing industry.

Selecting from those goals, representatives from various groups then defined objectives (i.e. specific outcomes that would indicate achievement of a goal) and strategies (i.e. steps that could be taken to achieve those objectives).

Of the four options developed by the group, three were proposal based and one was formulaic. We spent some time talking about process questions that surround the proposal based approach, but by the last meeting the majority of participants at that meeting seemed to feel that a formulaic approach would be less subjective and easier to implement concurrently with the remainder of the IFQ program.¹ Some of the reasons participants favored the formulaic approach

¹ A summary of the questions we discussed regarding the proposal/EFP type approach can be found in the attached summary of stakeholder workshops on page 8.

included fairness, cost, administrative burden, certainty, and the ability of the formulaic approach to be proactive rather than reactive.

The majority of the group also indicated an interest in meeting again to further develop the program. The consensus was that for another meeting to have value, it would first be critical for the Council to prioritize the goals for the program. It would also be important for the Council to clarify whether they prefer a proposal driven system or a formulaic approach.

The attached Summary of Stakeholder Workshops describes the details of the process we went through and the options developed. We hope that this effort will be helpful as the Council further defines priority goals and objectives and structure for the AMP at this meeting.

This overview is merely a summary of the workshop proceedings. It does not reflect EDF's recommendations for the Adaptive Management Program which will be presented in our public comment.

INTRODUCTION

The PFMC voted in November, 2008 on initial allocation in the non-whiting trawl fishery: 90% allocation to LE permits/vessels, and 10% to an Adaptive Management program, with the details of Adaptive Management to be developed. EDF convened a series of meetings with stakeholders to begin the process of fleshing out options for how the Adaptive Management Program (AMP) could be structured.

Three working sessions were held, with attendance/participation varying somewhat from session to session. In every session there was representation from the fishing, processing, and environmental sectors, and also State and Council participation. A list of participants, by meeting, is shown below (with apologies for errors or omissions).

Name/Organization	Dec 8, 2008	Jan 21, 2009	March 19, 2009
Andrew Bornstein, Bornstein Seafoods	Yes	Yes	Yes
Brian Mose, facilitator	Yes	Yes	Yes
Corey Niles, WDFW		Yes	Yes
Craig Urness, Pacific Seafoods			Yes
Dan Erickson, ODFW			Yes
Dorothy Lowman, EDF	Yes	Yes	Yes
Geoff Bettencourt, Fisherman	Yes		
Jen Kassakian, Ocean Conservancy	Yes	Yes	
Jim Caito, Caito Fisheries		Yes	
Joanna Grebel, CDFG			Yes
Johanna Thomas, EDF	Yes	Yes	
Kelly Ames, ODFW			Yes
Laura Pagano, NRDC	Yes	Yes	Yes
Meghan Jeans, The Ocean Conservancy	Yes		
Merrick Burden, PFMC	Yes	Yes	Yes
Paul Kujala, Fisherman			Yes
Pete Leipzig, FMA	Yes	Submitted paper	
Shems Jud, EDF	Yes	Yes	Yes
Stuart Nelson, facilitator	Yes	Yes	Yes
Tommy Ancona, FMA	Yes	Submitted paper	

The process used in the sessions was informal – the ad hoc group worked on clarifying goals and objectives, combining them into options, and fleshing out the details of options. A brainstorming, rather than consensus approach, was used. Development and recording of an option did not imply that all participants agreed with it.

The intention of the process was to:

- Provide support for individuals or organization to develop their own ideas or options (stimulate thought).
- Provide a range of options and information for Council to assist it in defining the parameters of the AMP program.

In this paper, the results of these stakeholder sessions are summarized. These findings are only representative of the work completed by those present at the sessions, it is not presented as inclusive of the views of all stakeholders.

IDENTIFYING GOALS AND OBJECTIVES FOR AMP

Though the potential purposes of AMP were oft-discussed leading up to the Council vote in November, few stakeholders had a common understanding of what specific goals and objective of the program might be, or how they would be put into practice. We identified a suite of goals, with each goal further described by objectives (what does achievement of the goal look like?) and strategies (how do we get there?). A common format was used to allow “bundling” of different goals to build different programs. Not all elements were fully fleshed-out. Note that not every entry under “objectives” and “strategies” strictly fits these definitions; however, we include them here as they were enunciated at the meetings.

PROCESSOR PERSPECTIVE

Goal	Maintain existing processing capability	Increasing the value of groundfish production (over long term)	Facilitate long term planning & stability
Objectives what does it look like?	use AMP to direct fish to vessels that need it (to keep them in business, and fish flowing to plants)	there will be higher quotas... And markets won't currently handle it	Industry training opportunities
	give quota to fishermen to encourage new entrants (only processor has incentive to <u>give</u> quota away)	proactive not reactive	Economic development and benefits in coastal communities
	proactive not reactive (precautionary approach)	continuity of supply	multi-year process
	promote geographically dispersed fishery - keep ports up and down the coast open	fewer boats with higher landings increases fleet viability; platform for growth	proactive not reactive
		encourage flexibility	
Strategies How do we get there? Actions	direct quota to fleet manager at plant to divvy appropriately amongst fleet		duration of AMP = life of the ITQ program
	Co. receives the AMP		annual doesn't facilitate long term planning
	no charge for use of AMP		need to "scale" AMP to Co size (production history will vary over time)
	divvy up to boats each season		not a competitive process each year where you don't know how much you'll access

STATE PERSPECTIVE*

Goal	Provide certainty to current participants	Equitable geographic dispersion	Minimize adverse impacts	Conservation
Objectives what does it look like?	proactive not reactive	by state	"baffles" on wholesale changes	prevent localized depletion
	multi-year process to facilitate planning and stability	within states	equitable - based on past, and preventing large swings between states (avoid big winner/loser). Defined by landings history.	environmentally friendly gear. Gear innovation.
	equitable - based on past, and preventing large swings between states (avoid big winner/loser). Defined by landings history.	restore fishing activities when stocks are rebuilt in areas where they existed when stocks were healthy	without un-balancing negotiating dynamics between processors and fishermen	reducing habitat effects
	find balance between processor stability and attracting new entrants		prevent localized depletion	
	certainty is good for business... Attracts new entrants			
	states have a public process (documented)			
Strategies How do we get there? Actions	quota needs to stay in the state	state by state pools of quota (divided amongst states)	quota as tool to minimize adverse impacts	conservation groups would have input
	Who is eligible to apply? Council decision required fishermen and processors can apply	based on history. Or - based on needs (how to assess needs?)		ENGOs may make proposals
	multi year plan	need to define "vulnerability"		
	will always be fished by permit holders			

*Note: not all state agencies were present at each session; these goals, objectives and strategies were based on participants' comments and on the public record of discussion at earlier Council and GAC meetings

ENVIRONMENTAL PERSPECTIVE

Goal	Sustainable/best fishing practices	Community stability	Ability to react appropriately to unforeseen impacts of ITQ program
Weight (%)	60%	20%	20%
Objectives what does it look like?	minimize habitat impact	variety of types of fishing vessels	need flexibility... To assign QPs to direct to addressing environmental uses
	incentives for innovation and greater selectivity	ensure that geographic shifts do not create risk of local depletion	
	ie net sensors (mensuration) - electronics to ensure nets fishing effectively (quickly off the bottom)	communities have a responsibility to support resource stewardship	
	encourage compliance. Must have good track record to access AMP	"character of the coast" preserved overall (macro, not micro view)	
	less catch of overfished species and other bycatch		
Strategies how do we get there?	Incentives for controlled gear conversion/switching		if no unforeseen impacts, the 20% would revert to other goals
	100% observer coverage		
	set amount of AMP (3-5%) to environmental objectives from year 1		
	annual allocation process		
	proposal system - could be partnered with other AMP Goals/Programs		
	research to confirm benefits of different gears & methods		
	establish rating criteria to minimize subjectivity		

FISHERMEN PERSPECTIVE

Goal	New entrants in fish processing	Economically stronger trawl fishing industry	Mitigate unforeseen consequences of IFQs
Objectives what does it look like?	increasing employment	more selective fishing gear	
	new market opportunities	biological research	
	new product forms		
Strategies How do we get there? Actions	proposals that lead to establishment of new processing or seafood distribution businesses.	proposals that encourage innovative gear practices and fishing strategies.	proposals that provide mitigation to negative impacts of the IFQ program leading to long term stability.
	proposals that encourage development of new market opportunities.		
	not trying to maintain the status quo, but to assist in orderly change to improve the economic health of the fishing industry.		

STRUCTURE & DESIGN ELEMENTS OF AMP (PROPOSAL OR FORMULA?)

With goals more clearly enunciated, it remained to develop structure and design elements whereby the programs could be implemented.

Three of the “paths” developed – fishermen, environmental, and State – utilized a proposal system, while one (processors) used a formulaic approach.

PROPOSAL SYSTEM – “1ST CUT”

In our first attempt to craft options using a proposal system, we focused on capturing relevant points rather than forging a comprehensive option. Following are the points – some of them questions rather than answers – recorded during our initial proposal-system brainstorming session.

STATE PERSPECTIVE

- process could differ state to state.
- proposal-based program - who is eligible and who decides?
- proposals submitted to: through federal channels; states would recommend; state would develop process to recommend.
- legalities - you can't allocate to a state; states would make recommendations.
- entity submits proposal to state, state forwards to Council/NOAA.
- within State: use authority of DFW . Tap into board of advisors/reviewers (diverging viewpoints).
- proposals are evaluated... What are criteria? Weighting?
- Multi-year process.
- say... First year... Stability to processors. Build criteria based on that goal. Could change focus over time. Criteria more guiding than determinative.
- may be more qualitative than quantitative.

- how to ensure that other goals don't get set aside? Could get extra points for addressing environmental, for instance.
- must be an audit/review component - did applicants live up their plans?
- must be careful that states don't establish competing criteria (through weighting of criteria).
- BIG FEATURE OF THIS OPTION - who is eligible to apply? Trade-off openness with chaos!

Subsequent discussion points:

- Washington would like a program in place at the outset of the program.
- California has little appetite or capacity to take on a program that is costly or time consuming.

ENVIRONMENTAL PERSPECTIVE

- proposal system, with weighting of goals.
- environmental AMP could be rolled into other types of AMP proposals having these goals.
- Possible measurement criteria:
 - establish benchmark conservation criteria to define measurable parameters of "best practices."
 - overfish/bycatch species (lowest mortality, lowest encounters).
 - at-sea releases (lowest ratio of discards to retained).
 - bottom impacts (highest bottom-fish landings per hour towed).
- who submits proposals? Fishermen/processors, or ENGOs?
- set up a formula to measure achievement of criteria. Recognize practicalities from fishing perspective.
- define parameters that are meaningful; may be different by State.
- incentives to reward catching fewer overfished species.
- Who reviews/evaluates proposals? Same system as would be used in other proposal review proposals.
- possibility - this AMP gets assigned to vessels, and withdrawn from those not meeting standards.
- incentives to permanently switch to less impactful gear; research to confirm what is less impactful gear.

Subsequent discussion point:

- Could convene a process whereby fishermen develop practical guidelines for setting sustainable fishing guidelines, based on the measurement criteria shown above.
- Using appropriate criteria, the environmental program could easily be converted to a formulaic approach.

FISHERMEN PERSPECTIVE

- shares provided through this program may not be transferred to or used by anyone not identified in the proposal/application.
- distribution of shares to approximate a balance between States (WA 20%, OR 45%, CA 35%).
- distribution to States will vary for species with unique geographic distinctions.
- each State conducts a review of each application received from constituents & make recommendations to council.
- States to establish own processes for submission & review.
- AMP proposals must have sufficient info for Council to determine:
 - a. That the proposal meets the purpose of the program

- b. There is adequate justification for the granting of quota
- c. The potential benefits of the allocation of quota have been identified
- d. that the allocation of quota will mitigate any negative consequences of the IFQ program
- application structured as a business plan addressing how quota will be used.
- applications to States 2 weeks prior to June Council Meeting. Council advisory bodies to make recommendations to Council in June for preliminary action. Final action at November Council meeting.
- any AMP candidates convicted of falsification of fish tickets or other elements of IFQ plan may be denied future access to AMP.
- follow up reports to be submitted to Council indicating specific accomplishments, shortcomings, and rationale for shortcomings.

Subsequent discussion point:

- the current EFP process seems to be fairly workable and transparent.

PROPOSAL SYSTEM – “2ND CUT”

Having cited possible elements of a proposal system under three different AMP “paths” (State, environmental, fishermen), we recognized that many of the design issues are common to a proposal-driven system. We attempted to address issues inherent in the proposal system by addressing key issues in turn, starting at the highest level (allocation of AMP to States), then progressing to finer details (use of AMP aboard vessels).

Results of this exercise are shown below:

Proposal System Element	Primary Area of Discussion	Option(s) Discussed																												
AMP by-species	AMP must be calculated and distributed by species. All species are important in an ITQ fishery as abundances and target vs. non-target species change constantly.	Do all species need to be included? Or just the major ones?																												
AMP division amongst States	<p>A formula to divide AMP, by species, amongst States. For example (using species grouping instead of individual species):</p> <table border="1" data-bbox="384 544 1115 804"> <thead> <tr> <th>AMP</th> <th>WA</th> <th>OR</th> <th>CA</th> </tr> </thead> <tbody> <tr> <td>Flatfish</td> <td>20%</td> <td>45%</td> <td>35%</td> </tr> <tr> <td>Sablefish</td> <td>20%</td> <td>45%</td> <td>35%</td> </tr> <tr> <td>Rockfish</td> <td>20%</td> <td>45%</td> <td>35%</td> </tr> <tr> <td>Other</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Groundfish</td> <td>20%</td> <td>45%</td> <td>35%</td> </tr> <tr> <td>Overfished</td> <td>20%</td> <td>45%</td> <td>35%</td> </tr> </tbody> </table> <p>Percentages could vary according by State. Key factor should be landings in the State (not abundance of species in waters adjacent to the State). QS not “held” by States but rather held in trust by Federal government. AMP “flows through” the States to vessels that will fish it.</p>	AMP	WA	OR	CA	Flatfish	20%	45%	35%	Sablefish	20%	45%	35%	Rockfish	20%	45%	35%	Other				Groundfish	20%	45%	35%	Overfished	20%	45%	35%	Or... could have no formal division amongst States. Council could decide.
AMP	WA	OR	CA																											
Flatfish	20%	45%	35%																											
Sablefish	20%	45%	35%																											
Rockfish	20%	45%	35%																											
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Groundfish	20%	45%	35%																											
Overfished	20%	45%	35%																											
AMP Programs within States – the same or different?	<p>Council could specify broad terms and States could vary the emphasis. If States wanted dramatically different systems, it wouldn’t be formalized that way. Some States could be more active, others more passive (delegating functions to Council). NMFS would maintain the final say – approve of any AMP distributions.</p>																													
Who qualifies? Who can submit proposals?	<p>Since LE vessels will ultimately fish the AMP, vessels should be specified and included in the proposal. Similarly, processors should be included (since processors did not get an initial allocation, AMP is necessary to secure their interests). Other entities could apply (for example, environmental organizations) but must specify who will harvest and process the catch. Should include signatures of participant vessels and processors. Proposals that include strong partnership elements (have all parties identified) will likely get a higher grade in the evaluation process.</p>	Initial exclusion of vessels and/or processors from proposals may improve the “clout” of the applicant; that is, once the AMP is procured, you are in a strong position to find qualified vessels and processors.																												

Proposal System Element	Primary Area of Discussion	Option(s) Discussed
Will AMP be fully subscribed each year?	<p>AMP should be fully allocated each year. It's too complex otherwise.</p> <p>Make AMP the "first fish caught" (including an identifier on AMP QPs).</p> <p>There will be lots of proposals each year... no shortage of stakeholders eager to utilize the AMP. Everyone wants more fish! AMP should be allocated at the beginning of the season to facilitate planning.</p> <p>Since AMP will always be fished by LE permit-vessels – might as well use AMP to encourage "best use" of the fish.</p> <p>Want system to improve chances that QPs will be fished each season.</p>	<p>May not be enough, or high enough quality, proposals to fully allocate AMP. Should be an option not to give out the whole thing (in which case, AMP would flow through to vessels pro rata to their holdings.</p> <p>Leave it to the States to decide.</p>
Is AMP awarded one year at a time? Or multi-year?	<p>It's helpful to know <u>before</u> designing the AMP what the goals and objectives of Council are.</p> <p>Want to encourage stability, and one-year distributions could be administratively burdensome, and disruptive to industry.</p> <p>If program is one year at a time, there must be reasonable expectations on how to access AMP each year (for example BC system – issued each year, but the goals & objectives and the evaluation process are "fixed").</p> <p>If AMP allocated for multi-years there'd be less available to deal with unforeseen circumstances.</p> <p>Would be very difficult to have differing durations for proposals within the AMP system. All proposals should be on the same schedule, whether one year or longer.</p>	
AMP: one purpose (goal) or multi-purpose?	<p>Can have multiple goals, but must be specific about how goals are weighted and that the weighting will be consistent over time so industry has some certainty.</p> <p>Can have stand-alone goals, each with a specified portion of the AMP and a distinct evaluation process, or can have "bundled" goals, with proposal scoring based on best overall fit.</p>	<p>Can pick a single or predominant goal; for example, community stability.</p>
Who evaluates proposals?	<p>State-driven process: each state allocates resources (for example staff and/or advisory groups already in place) to evaluate proposals.</p> <p>Council would review State recommendations.</p> <p>NMFS would approve and issue AMP.</p> <p>We need a flowchart to describe how the State process will intersect with Council.</p>	<p>What if States don't want to be very involved?</p> <p>NMFS concerned about complexity and workload.</p> <p>Could involve GAP or other Council advisory bodies?</p>
When are proposals due/evaluated?	<p>Once a year, before the season. Similar to the EFP schedule.</p>	
Do accumulation limits apply to AMP?	<p>No.</p>	<p>Yes.</p>

Proposal System Element	Primary Area of Discussion	Option(s) Discussed
Performance Reports, system of follow-up. Are proponents meeting commitments?	How to get report before the season is over? A one year lag? Could be a benefit of a multiyear program - make progress reports.	
Consequences on non-performance?	Could be sanctions for failing to deliver on proposal commitments – for example, don't receive AMP next time. Must be on a case-by-case basis; if a fishermen/processor arrangement falls apart... who is to blame? Must be assessed. Quasi-judicial functions... check legal footing.	Could be complaint-driven system. A proposal may fall apart, but both sides may be content... no complaint, no problem?

Despite making progress on defining the parameters of a proposal-driven AMP system, participants present at the third (March 19) session generally concluded that:

- Given the complexity and subjectivity inherent in a proposal approach, there is considerable appeal to a formulaic approach, particularly at the launch of the program.
- A proposal and formulaic approach need not be mutually exclusive... elements could be mixed and matched.

We thus considered some variations on a formulaic approach, including the first cut from the processor option, and two alternative approaches that were presented at the March 19 meeting.

FORMULAIC SYSTEM – “1ST CUT”

The key points in the first effort to develop a processor-oriented formulaic option were as follows:

- 3 goals (maintain existing processing capacity, increasing the value of groundfish production over the long term, and facilitating long term planning and stability) = one purpose.
- All AMP to this purpose.
- formula to decide how much each Co gets based on corporate production history.
- not an application process.
- use fish tickets as criteria (for determining production history).
- production history is basis - should be pretty current... 5 years trailing, for example
- 5 years is better than one year... (most recent).
- no AMP for Co's already out of business; if you have a zero year last yr you're a new entrant
- fish flow - re processor giving fish to fishermen to help them out. Issue - giving out up-front pro-rata to holdings, or metering it out over the season
- new entrants - a period of "disadvantage" as they gain production history (5 yr formula)
- every year the AMP is issued
- accumulation limits? Do they apply to AMP? Can they go over with AMP? We need rules before we can determine.

With this program fairly narrow in focus, and the appeal of a formulaic approach growing, we looked at some additional, slightly broader, options.

FORMULAIC SYSTEM – “2ND CUT”

The two options discussed March 19 are appended to this document. These options have the following potential characteristics:

- Based on landings history (by state, and/or by plant, and/or by vessel). The period chosen, and the weighting of the years, has a bearing on who gets what. The qualifying period and formula can be used to steer industry toward desired results (goals and objectives). The formula could change over time based on review.
- System can include discretion – for example, AMP may flow through to processing plants based on their production history. Plants may then allocate AMP to vessels according to their pro rata landings, or plants may have discretion in how they distribute AMP amongst their fleets. The Council could include rules specifying the way quota would be distributed among vessels when establishing the formula.
- System can be “binary” – qualification for AMP may be “all or nothing.” For example, simply providing evidence of a signed delivery arrangement with a processor may qualify a vessel for AMP, whereas vessels lacking an arrangement may get none.

Two options discussed March 19 are described as follows:

FORMULA OPTION (VARIATION OF PROCESSOR OPTION)

1. AMP flows through States based on agreed-upon percentages, for example:

WA	20%
OR	45%
CA	35%

Percentages could be based on historical averages. Different qualifying periods, terms, and calculation methods could have different effects.

example:

	AMP Division Amongst States				
	to Permits	to AMP	WA	OR	CA
ITQ Distribution %	90%	10%	20%	45%	35%
ITQ Distribution lbs	39,583,593	4,398,177	879,635	1,979,180	1,539,362

2. AMP flows through processors (at plant level by-state) based on the plant’s production history (calculated share of fish purchases in that state). For example a plant with 10% of the production history in Oregon will have access to 10% of Oregon’s AMP. The nature of the formula could favour stability or new entrants.

example:	Processing History (Shares)			AMP Distribution by Plant (lbs)		
	WA	OR	CA	WA	OR	CA
# Plants by State	5	10	10			
Processing History						
Plant 1	30%	20%	15%	263,891	395,836	230,904
Plant 2	25%	20%	15%	219,909	395,836	230,904
Plant 3	20%	15%	15%	175,927	296,877	230,904
Plant 4	15%	15%	10%	131,945	296,877	153,936
Plant 5	10%	10%	10%	87,964	197,918	153,936
Plant 6		10%	10%	-	197,918	153,936
Plant 7		5%	10%	-	98,959	153,936
Plant 8		2%	5%	-	39,584	76,968
Plant 9		2%	5%	-	39,584	76,968
Plant 10		1%	5%	-	19,792	76,968
	100%	100%	100%	879,635	1,979,180	1,539,362

- AMP flows to vessels according to delivery arrangements made between plants and fishermen. Plants advise NMFS which LE permit vessels to allocate AMP QPs (lbs and species) to. There could be rules to ensure that AMP gets fairly distributed amongst vessels.
- AMP flows to vessels. Could be rules governing how AMP is used, for example AMP = first fish caught (no carry-forward), AMP transferable amongst vessels, no charge for AMP (sub-leasing).

Principles underlying this Option:

- Simple, low cost at outset of ITQ plan.
- Consistent system across States.
- Processing activity within States a proxy for meeting State goals & objectives.
- Processors and fishermen share the goal of keeping fish and fishing activity in communities.
- Processors having AMP to allocate to vessels meets their needs.
- All AMP on vessels, with flexibility of usage, meets fishermen needs.
- Ongoing review of formulas, with revision if required.
- If review warrants, formula approach can be replaced by Proposal/Evaluation system.

A possible variation discussed:

- Processors could be compelled to distribute AMP to participating vessels based on their pro rata contribution to the proposal, or their production history (vs. having discretion). For example, it could be distributed based on landings at plant in the previous year.

FORMULA OPTION 2 (VARIATION OF FISHERMEN OPTION)

- AMP flows through States based on agreed-upon percentages, for example:

WA	20%
OR	45%
CA	35%

Percentages could be based on historical averages. Different qualifying periods, terms, and calculation methods could have different effects. Note – this is the same as the prior option.

example:

	AMP Division Amongst States				
	to Permits	to AMP	WA	OR	CA
ITQ Distribution %	90%	10%	20%	45%	35%
ITQ Distribution lbs	39,583,593	4,398,177	879,635	1,979,180	1,539,362

- AMP distributed to vessels according to two criteria, with suggested weighting 50/50 between the two:
 - Based on the vessels’ % of State landings (production history). That is, the vessel gets its pro rata share of the State’s AMP. Different qualifying and weighting formulas could be applied.
 - Based on evidence of a delivery arrangement with a processor. If a valid document is provided, then the vessel qualifies under this criteria and receives an equal portion of AMP as other vessels meeting the test; if not, the vessel receives no AMP under this qualification.

This is a “two-tiered” qualifying system, with a. based on a production history formula, and b. based on a “binary” (yes or no) qualification.

To vessels:		WA	OR	CA
based on % of State landings history	50%	439,818	989,590	769,681
based on evidence of delivery arrangement with plant (by state)	50%	439,818	989,590	769,681
		879,635	1,979,180	1,539,362

Additional calculations are shown in the example in the appendix.

In this option, the weighting between the two qualifying criteria could be varied.

SUMMARY OF PROGRESS: THE “LEANING” OF THE GROUP

While we reiterate that our ad hoc working group had no decision-making mandate, and was not operating under a formal consensus model, by the end of our third meeting, there was substantial support for the following propositions among third meeting participants:

- Implement a formula-based AMP at the outset because of simplicity, workability, and cost.
- Review the formula-based AMP after 3-5 years (possibly linked to a comprehensive review of the ITQ program). Consider:
 - The applicability of the production history and other formulas.
 - Rationale and support for moving to a proposal-driven model.
- Many variations and sub-options are possible. One sub-option raised was to take, say, 2% of the AMP under Formula 1 option and use a “binary” conservation qualifying criteria (that is, if sustainable fishing guidelines are met, then the vessel qualifies; if not, no AMP under this 2%. The balance of the AMP, 8%, would be awarded according to the overall formula.
- Use of three year production history for formulas was favoured; five years was deemed too long (retards change), shorter timeframe deemed unstable (no stability for existing participants).
- Distribute AMP based on actual (history) not political grounds.

It was hoped that this summary of our progress in defining the parameters of AMP program would be useful to Council and spur thought amongst stakeholders.

Participants expressed a willingness to engage in further talks after the April Council meeting if such work is found to be helpful.

APPENDIX - OPTIONS

1. Processor focus
2. State Focus
3. Environmental Focus
4. Fishermen Focus
5. Formula Option 1
6. Formula Option 2

Processor Focus

Goal	Maintain existing processing capability	Increasing the value of groundfish production (over long term)	Facilitate long term planning & stability
Objectives what does it look like?	use AMP to direct fish to vessels that need it (to keep them in business, and fish flowing to plants)	there will be higher quotas... And markets won't currently handle it	Industry training opportunities
	give quota to fishermen to encourage new entrants (only processor has incentive to <u>give</u> quota away)	proactive not reactive	Economic development and benefits in coastal communities
	proactive not reactive (precautionary approach)	continuity of supply	multi-year process
	promote geographically dispersed fishery - keep ports up and down the coast open	fewer boats with higher landings increases fleet viability; platform for growth	proactive not reactive
		encourage flexibility	
Strategies How do we get there? Actions	direct quota to fleet manager at plant to divvy appropriately amongst fleet		duration of AMP = life of the ITQ program
	Co. receives the AMP		annual doesn't facilitate long term planning
	no charge for use of AMP		need to "scale" AMP to Co size (production history will vary over time)
	divvy up to boats each season		not a competitive process each year where you don't know how much you'll access
Design Elements	3 goals = one purpose		
	All AMP to this purpose		
	formula to decide how much each Co gets based on corporate production history		
	not an application process		
	use fish tickets as criteria (for determining production history)		
	production history is basis - should be pretty current... 5 years trailing, for example		
	5 years is better than one year... (most recent)		
	no AMP for Co's already out of business; if you have a zero year last yr you're a new entrant		
	fish flow - re processor giving fish to fishermen to help them out. Issue - giving out up-front pro-rate to holdings, or metering it out over the season		
	new entrants - a period of "disadvantage" as they gain production history (5 yr formula)		
	every year the AMP is issued		
accumulation limits? Do they apply to AMP? Can they go over with AMP? We need rules before we can determine.			

State Focus

Goal	Provide certainty to current participants	Equitable geographic dispersion	minimize adverse impacts	conservation
Objectives what does it look like?	proactive not reactive	by state	"baffles" on wholesale changes	prevent localized depletion
	multi-year process to facilitate planning and stability	within states	equitable - based on past, and preventing large swings between states (avoid big winner/loser). Defined by landings history.	environmentally friendly gear. Gear innovation.
	equitable - based on past, and preventing large swings between states (avoid big winner/loser). Defined by landings history.	restore fishing activities when stocks are rebuilt in areas where they existed when stocks were healthy	without un-balancing negotiating dynamics between processors and fishermen	reducing habitat effects
	find balance between processor stability and attracting new entrants		prevent localized depletion	
	certainty is good for business... Attracts new entrants			
	states have a public process (documented)			
Strategies How do we get there? Actions	quota needs to stay in the state	state by state pools of quota (divided amongst states)	quota as tool to minimize adverse impacts	conservation groups would have input
	Who is eligible to apply? Council decision required fishermen and processors can apply	based on history. Or - based on needs (how to assess needs?)		ENGOs may make proposals
	multi year plan	need to define "vulnerability"		
	will always be fished by permit holders			
Design Elements	process could differ state to state			
	proposal-based program - who is eligible and who decides?			
	proposals submitted to: through federal channels; states would recommend; state would develop process to recommend			
	legalities - you can't allocate to a state; states would make recommendations			
	entity submits proposal to state, state forwards to Council/NOAA			
	within State: use authority of DFW . Tap into board of advisors/reviewers (diverging viewpoints)			
	proposals are evaluated... What are criteria? Weighting?			
	multi year process			
	say... First year... Stability to processors. Build criteria based on that goal. Could change focus over time. Criteria more <u>guiding</u> than <u>determinative</u> .			
	may be more qualitative than quantitative			
	how to ensure that other goals don't get set aside? Could get extra points for addressing environmental, for instance			
	must be an audit/review component - did applicants live up their plans?			
must be careful that states don't establish competing criteria (through weighting of criteria)				
BIG FEATURE OF THIS OPTION - who is eligible to apply... Tradeoff openness w/ chaos				

Enviro Focus

Goal	Sustainable/best fishing practices	Community stability	Ability to react appropriately to unforeseen impacts of ITO program
Weight (%)	60%	20%	20%
Objectives what does it look like?	minimize habitat impact	variety of types of fishing vessels	need flexibility... To assign QPs to direct to addressing environmental uses
	incentives for innovation and greater selectivity	ensure that geographic shifts do not create risk of local depletion	
	ie net sensors (mensuration) - electronics to ensure nets fishing effectively (quickly off the bottom)	communities have a responsibility to support resource stewardship	
	encourage compliance. Must have good track record to access AMP	"character of the coast" preserved overall (macro, not micro view)	
	less catch of overfished species		
Strategies how do we get there?	Incentives for controlled gear conversion/switching		if no unforeseen impacts, the 20% would revert to other goals
	100% observer coverage		
	set amount of AMP (3-5%) to environmental objectives from year 1		
	annual allocation process		
	proposal system - could be partnered with other AMP Goals/Programs		
	research to confirm benefits of different gears & methods		
	establish rating criteria to		
Design Elements	proposal system, with weighting above		
	environmental AMP could be rolled into other types of AMP proposals having these goals		
	Possible measurement criteria: - establish benchmark conservation criteria to define measurable parameters of "best practices" - overfish/bycatch species (lowest mortality, lowest encounters) - at-sea releases (lowest ratio of discards to retained) - bottom impacts (highest bottom-fish landings per hour towed)		
	who submits proposals? Fishermen/processors, or ENGOs?		
	set up a formula to measure achievement of criteria. Recognize practicalities from fishing perspective		
	define parameters that are meaningful; may be different by State		
	incentives to reward catching fewer overfished species		
	Who reviews/evaluates proposals? Same system as would be used in other proposal review proposals		
	possibility - this AMP gets assigned to vessels, and <u>withdrawn</u> from those not meeting standards		
	incentives to permanently switch to less impactful gear; research to confirm <u>what is</u> less impactful gear		

Goal	New entrants in fish processng	Economically stronger trawl fishing industry	Mitigate unforeseen consequences of IFQs
Objectives what does it look like?	increasing employment	more selective fishing gear	
	new market opportunities	biological research	
	new product forms		
Strategies How do we get there? Actions	proposals that lead to establishment of new processing or seafood distribution businesses.	proposals that encourage innovative gear practices and fishing strategies.	proposals that provide mitigation to negative impacts of the IFQ program leading to long term stability.
	proposals that encourage development of new market opportunities.		
	not trying to maintain the status quo, but to assist in orderly change to improve the economic health of the fishing industry.		
Design Elements	any unallocated shares will be redistributed to all share holders in proportion to their holdings		
	shares provided through this program may not be transferred to or used by anyone not identified in the proposal/application.		
	distribution of shares to approximate a balance between States (WA 20%, OR 45%, CA 35%)		
	distribution to States will vary for species with unique geographic distinctions		
	each State conducts a review of each application rec'd from constituents & make recs to council		
	States to establish own processes for submission & review		
	AMP proposals must have sufficient info for Council to determine:		
	a. That the proposal meets the purpose of the program		
	b. There is adequate justification for the granting of quota		
	c. The potential benefits of the allocation of quota have been identified		
	d. that the allocation of quota will mitigate any negtive consequences of the IFQ program		
	application structured as a business plan addressing how quota will be used.		
applications to States 2 wks prior to June Council Mtng. Council advisory bodies to make recommendations to Council in June for preliminary action. Final action at November Council meeting.			
any AMP candidates convicted of falsification of fish tickets or other elements of IFQ plan may be denied futre access to AMP			
follow up reports to be submitted to Council indicating specific accomplishments, shorcomings, and rationale for shortcomings			

Formula Option

1 AMP flows through States based on allocation percentages; for example

WA	20%
OR	45%
CA	35%

Percentages could arise from:
 historical averages
 current averages (rolling)
 desired levels (adjusted periodically)
 or be arbitrarily pegged (with periodic review)

example:

ITQ Distribution %
 ITQ Distribution lbs

	AMP Division Amongst States				
	to Permits	to AMP	WA	OR	CA
ITQ Distribution %	90%	10%	20%	45%	35%
ITQ Distribution lbs	39,583,593	4,398,177	879,635	1,979,180	1,539,362

Could be different percentages by species, or across the board
 States could "sub-divide" their allocation by region (ie north half of state gets 60%, south gets 40%)

2 AMP flows through processors (at plant level by-state) based on production history

Each plant with qualifying history receives pro rata share of AMP to distribute to vessels

Production history could be calculated in various ways:
 3 year rolling average
 3 year rolling average w/ greater weight on recent year(s)
 last year

Nature of formula can favor stability or facilitate new entrants
 Could change formula over time
 Other goals could be introduced over time (ie conservation)

example:

Plants by State
 Processing History
 Plant 1
 Plant 2
 Plant 3
 Plant 4
 Plant 5
 Plant 6
 Plant 7
 Plant 8
 Plant 9
 Plant 10

	Processing History (Shares)			AMP Distribution by Plant (lbs)		
	WA	OR	CA	WA	OR	CA
# Plants by State	5	10	10			
Plant 1	30%	20%	15%	263,891	395,836	230,904
Plant 2	25%	20%	15%	219,909	395,836	230,904
Plant 3	20%	15%	15%	175,927	296,877	230,904
Plant 4	15%	15%	10%	131,945	296,877	153,936
Plant 5	10%	10%	10%	87,964	197,918	153,936
Plant 6		10%	10%	-	197,918	153,936
Plant 7		5%	10%	-	98,959	153,936
Plant 8		2%	5%	-	39,584	76,968
Plant 9		2%	5%	-	39,584	76,968
Plant 10		1%	5%	-	19,792	76,968
	100%	100%	100%	879,635	1,979,180	1,539,362

3 AMP flows to vessels according to delivery arrangements made by plants and local fishermen.

Plants advise NMFS which LE permit vessels to allocate QPs (lbs and species)

Potential rules governing AMP distribution:
 no more than 5% of a state's AMP to a single vessel
 each plant receiving AMP to distribute to at least 3 vessels
 no charge to vessels for AMP
 up to industry to enforce delivery arrangements
 provisions ensuring vessels "playing ball" receive AMP (not unfairly excluded)?

Max per-State AMP to a single vessel:
 Min # vessels/plant
 Min # vessels/state

5%
3

	WA	OR	CA
Max per-State AMP to a single vessel:	43,982	98,959	76,968
Min # vessels/plant			
Min # vessels/state	15	30	30

4 AMP on vessels

Potential rules governing AMP use:
 AMP freely transferable amongst vessels
 AMP = first fish caught, no carry-forwards
 no charge for transfers - swaps only

Principles underlying this Option:

- Simple, low cost at outset of ITQ plan
- Consistent system across States
- Processing activity within States a proxy for meeting State goals & objectives
- Processors and fishermen share the goal of keeping fish and fishing activity in communities
- Processors having AMP to allocate to vessels meets their needs
- All AMP on vessels, with flexibility of usage, meets fishermen needs
- Ongoing review of formulas, with revision if required

Formula Option 2

TAC (lbs) 43,981,770

ITQ	90%	39,583,593			
AMP	10%	4,398,177	WA	OR	CA
		43,981,770	8,796,354	19,791,797	15,393,620

AMP Distribution

WA	20%	879,635
OR	45%	1,979,180
CA	35%	1,539,362
		4,398,177

- Elements
- determine State AMP allocation %'s
 - determine formula for allocation of State AMP to vessels:
based on % of state landings
based on proof of delivery arrangement w/ plant
 - review & evaluate

To vessels:
based on % of State landings history
based on evidence of delivery arrangement with plant

		WA	OR	CA
	50%	439,818	989,590	769,681
	50%	439,818	989,590	769,681
		879,635	1,979,180	1,539,362

Vessels	Landings by State			Landings History			Prod'n History			Proof of Delivery Arrangement			Del Arr. Allocation			AMP Distribution to Vessels (lbs)			
	% Landings WA	% Landings OR	% Landings CA	Landings WA	Landings OR	Landings CA	% of WA landings	% of OR landings	% of CA landings	WA	OR	CA	WA	OR	CA	WA	OR	CA	Total
1	1%	100%		439,818	-	-	4.7%		0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
2	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
3	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
4	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	0			0.0%	0.0%	0.0%	20,697	-	-	20,697
5	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
6	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
7	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	0			0.0%	0.0%	0.0%	20,697	-	-	20,697
8	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
9	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
10	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	0			0.0%	0.0%	0.0%	20,697	-	-	20,697
11	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
12	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
13	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
14	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	0			0.0%	0.0%	0.0%	20,697	-	-	20,697
15	1%	100%		439,818	-	-	4.7%	0.0%	0.0%	1			3.8%	0.0%	0.0%	37,613	-	-	37,613
16	1%	50%	50%	219,909	219,909	-	2.4%	0.9%	0.0%	1	1		3.8%	2.7%	0.0%	27,265	36,126	-	63,390
17	1%	50%	50%	219,909	219,909	-	2.4%	0.9%	0.0%	0	1		0.0%	2.7%	0.0%	10,349	36,126	-	46,474
18	1%	50%	50%	219,909	219,909	-	2.4%	0.9%	0.0%	1	1		3.8%	2.7%	0.0%	27,265	36,126	-	63,390
19	1%	50%	50%	219,909	219,909	-	2.4%	0.9%	0.0%	1	0		3.8%	0.0%	0.0%	27,265	9,380	-	36,645
20	1%	50%	50%	219,909	219,909	-	2.4%	0.9%	0.0%	0	1		0.0%	2.7%	0.0%	10,349	36,126	-	46,474
21	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
22	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	0		3.8%	0.0%	0.0%	22,090	14,070	-	36,160
23	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
24	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
25	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	0		3.8%	0.0%	0.0%	22,090	14,070	-	36,160
26	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
27	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
28	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
29	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	0	0		0.0%	0.0%	0.0%	5,174	14,070	-	19,244
30	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
31	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	1		3.8%	2.7%	0.0%	22,090	40,816	-	62,906
32	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	0		3.8%	0.0%	0.0%	22,090	14,070	-	36,160
33	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	0	1		0.0%	2.7%	0.0%	5,174	40,816	-	45,990
34	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	0	1		0.0%	2.7%	0.0%	5,174	40,816	-	45,990
35	1%	25%	75%	109,954	329,863	-	1.2%	1.4%	0.0%	1	0		3.8%	0.0%	0.0%	22,090	14,070	-	36,160
36	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
37	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
38	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
39	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
40	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
41	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
42	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
43	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506
44	1%		100%	-	439,818	-	0.0%	1.9%	0.0%				0.0%	2.7%	0.0%	-	45,506	-	45,506

Formula Option 2

45	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
46	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
47	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
48	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	0	0.0%	0.0%	0.0%	-	18,760	-	18,760	
49	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	0	0.0%	0.0%	0.0%	-	18,760	-	18,760	
50	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
51	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
52	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
53	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
54	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
55	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
56	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	0	0.0%	0.0%	0.0%	-	18,760	-	18,760	
57	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
58	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
59	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
60	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	0	0.0%	0.0%	0.0%	-	18,760	-	18,760	
61	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	0	0.0%	0.0%	0.0%	-	18,760	-	18,760	
62	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
63	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	0	0.0%	0.0%	0.0%	-	18,760	-	18,760	
64	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
65	1%	100%	-	439,818	-	0.0%	1.9%	0.0%	1	0.0%	2.7%	0.0%	-	45,506	-	45,506	
66	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
67	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	0	0.0%	0.0%	0.0%	-	11,256	11,841	23,097
68	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
69	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
70	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	0	0.0%	0.0%	0.0%	-	11,256	11,841	23,097
71	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
72	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
73	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
74	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
75	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
76	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
77	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
78	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
79	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	0	0.0%	0.0%	0.0%	-	11,256	11,841	23,097
80	1%	60%	40%	-	263,891	175,927	0.0%	1.1%	1.5%	1	0.0%	0.0%	3.8%	-	11,256	41,444	52,700
81	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
82	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
83	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	0	0.0%	0.0%	0.0%	-	-	29,603	29,603	
84	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	0	0.0%	0.0%	0.0%	-	-	29,603	29,603	
85	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
86	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
87	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
88	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
89	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
90	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
91	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	0	0.0%	0.0%	0.0%	-	-	29,603	29,603	
92	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
93	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
94	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
95	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	0	0.0%	0.0%	0.0%	-	-	29,603	29,603	
96	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	0	0.0%	0.0%	0.0%	-	-	29,603	29,603	
97	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
98	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	0	0.0%	0.0%	0.0%	-	-	29,603	29,603	
99	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	
100	1%	100%	-	-	439,818	0.0%	0.0%	3.8%	1	0.0%	0.0%	3.8%	-	-	59,206	59,206	

count 35 65 35 9,346,126 23,200,384 11,435,260 100% 100% 100% 26 37 26 100.0% 100.0% 100.0% 879,635 1,979,180 1,539,362 4,398,177

43,981,770