

Halibut Catch Sharing Plan Allocation Review: Workplan

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1 Introduction

The Council is preparing to conduct an Allocation Review for its Pacific Halibut Catch Sharing Plan (CSP). The halibut CSP established an abundance-based allocation between the commercial halibut fishery and the guided recreational (charter) fishery in the International Pacific Halibut Commission (IPHC) Regulatory Area 2C and Area 3A. The CSP also defined an annual process for establishing charter halibut management measures and created an opportunity for commercial halibut IFQ to be leased on an annual basis as guided angler fish (GAF) to charter halibut permit holders for harvest in the charter halibut fishery.

Allocation of fishery resources is an integral part of fishery management; however, it is also one of the most difficult and divisive policy decisions because of the value, history, and tradition associated with access to fishery resources and the perceptions of fairness that arise with allocation decisions. The Area 2C and Area 3A CSP affects an exceptionally large group of stakeholders who are both geographically and operationally diverse. Moreover, Allocation Reviews are relatively new to the Council process. Because of these factors, it is the goal of this workplan to align expectations of an Allocation Review (e.g., information that will be provided, types of decisions that can be made, who will make those decisions), outline a process that is transparent, and facilitate clear ways for stakeholders to participate in this process.

This workplan includes 1) a summary of the NOAA Allocation Policy and the triggers and process for Allocation Reviews, 2) a summary of the resources that help to define the scope of the Allocation Review, and 3) the proposed content to be included. Stakeholders can help to shape the focus of this review by submitting public comments along with this document, which will be considered by the Council, as well as its Scientific and Statistical Committee and Advisory Panel.

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2 Background on NOAA Allocation Review Policy

In 2010, NOAA committed to review the allocation process as part of the Recreational Saltwater Fisheries Action Agenda. A report was commissioned to compile fishery allocation issues for all types of fishery allocations (Lapointe 2012). The report summarized input from discussions with a wide range of stakeholders and suggested five steps NOAA Fisheries could take to address allocation issues: 1) increase stakeholder engagement in allocation decisions; 2) increase biological and social science research and data; 3) periodically review allocation decisions; 4) compile a list of past allocation decisions; and, 5) create a list of factors to guide allocation decisions.

In July 2016, NOAA Fisheries created an Allocation Policy (Policy Directive 01-119; further revised on 2/17) to provide a mechanism to ensure fisheries allocations are periodically evaluated to remain relevant to current conditions. The Allocation Policy includes two procedural directives that provide more details on implementing the policy. The first procedural directive (Procedural Directive 01-119-01) was developed by a Council Coordination Committee (CCC) and it outlines three categories of triggers that can be used by a council to initiate an allocation review: public interest, time, or indicators. The second procedural directive (Procedural Directive 01-119-02) was developed by NOAA Fisheries and it outlines recommended practices and factors to consider when reviewing and updating allocations. The policy and complementary procedural directives provide guidance for the periodic assessment of fishery allocations among users. They also help improve understanding of the process behind such allocation decisions. Collectively, these directives are incorporated into the Fisheries Allocation Review Policy (NMFS 2016).

These guidance documents do not modify or supersede any guidance associated with other applicable laws; rather, they are intended to help the Councils and NOAA review and update allocations under its authority.

2.1 Allocation Review Process

The Allocation Policy and procedural directives established a process which involves three steps (Figure 1).

Step 1: A trigger is met. There are three main categories of triggers: public input, time, or indicator based. For example, a significant change in landings (e.g., an increase/decrease greater than one to two standard deviations within a three-year timeframe, etc.) may be identified as an indicator-based trigger for initiating a review of an allocation decision. Triggers are discussed in more detail in the CCC trigger document (Procedural Directive 01-119-01). If the trigger is indicator-based, or time-based, then the process calls for proceeding immediately to step 2: fisheries allocation review. If the trigger is based on public input to the Council, then the Council is required to examine changes in social, ecological, or economic criteria (step 1a in Figure 1) to ensure assessment of the fisheries allocation is an appropriate use of Council resources. At this stage, in-depth analyses are not required.

Step 2: Fisheries Allocation Review. At this stage, the Council should complete a review of the fisheries allocation in question. This review will assist the Council in determining whether or not the development and evaluation of allocation options is warranted. It is not, in itself, a trigger to initiate a Fishery Management Plan (FMP) amendment² to consider alternative allocations. This step is discussed in more detail in the CCC triggers document (Procedural Directive 01-119-01) and overlaps with the NMFS fisheries allocation factors document (Procedural Directive 01-119-02). The review should consider the FMP objectives³ along with other relevant factors that have changed and may be important to the fisheries

² Or regulatory amendment in the case of the CSP.

³ Or program objectives in the case of the CSP.

allocation. Relevant factors are described in the NMFS fisheries allocation factors document (Procedural Directive 01-119-02).

At this stage, in-depth analyses are not required; however, to ensure transparency, a clear articulation of how the objectives are or are not being met, and a clear rationale on relevant factors considered should be included in the record. This fisheries allocation review informs whether or not a consideration of new allocation alternatives is warranted.

Step 3: Evaluation of Fisheries Allocation. Based on step two, if a Council decides that development of allocation options is warranted, a Council will proceed with formal analyses, and follow its amendment process for identifying alternatives, soliciting public input, etc. If the Council determines that the FMP objectives are not up-to-date, then the Council should discuss, evaluate, and if necessary, revise the objectives. During the identification of alternatives, Councils should consider the factors in the Procedural Directive 01-119-02. All of the factors do not need to be analyzed for each fisheries allocation decision. If a factor is not relevant for a given decision, no formal analysis for that factor is needed; however, the record should clearly document the rationale for that determination.

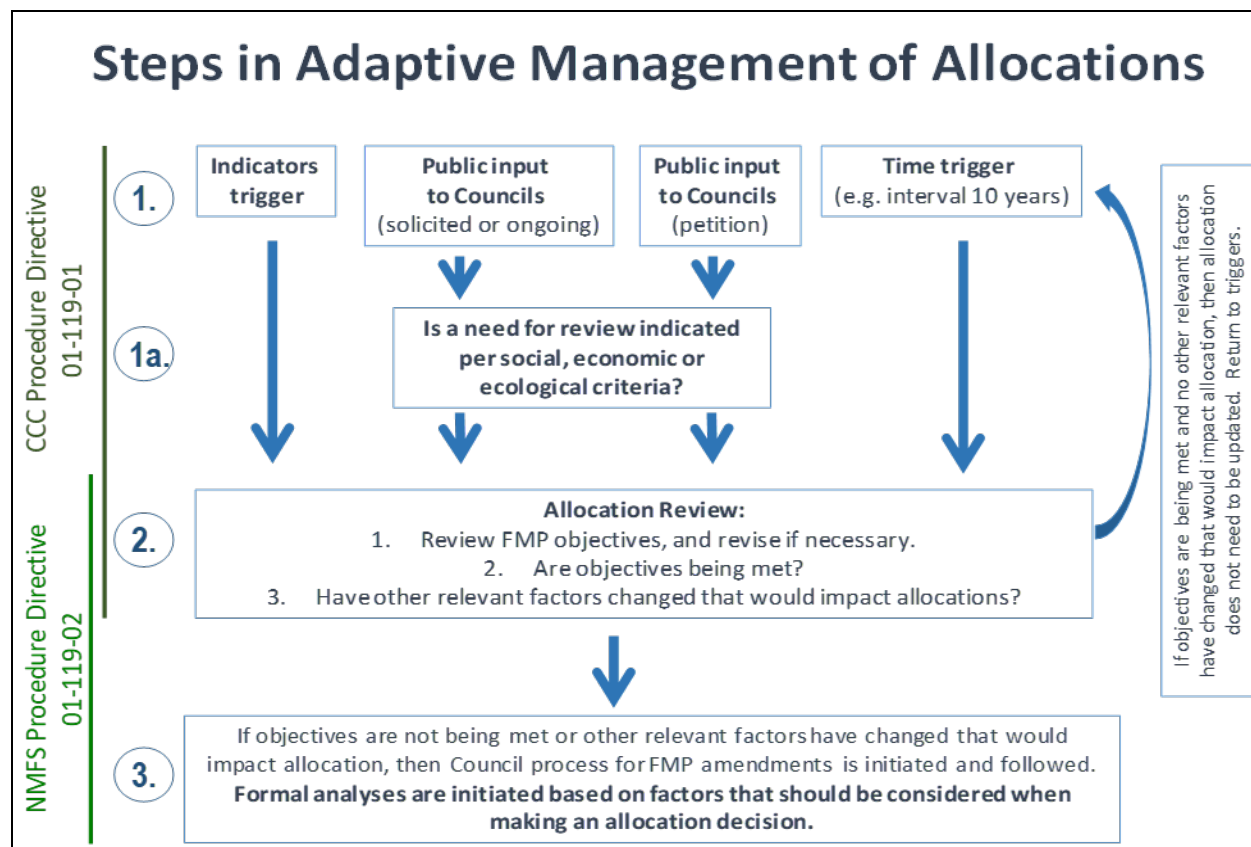


Figure 1 Steps for a Fisheries Allocation Review

2.2 Allocation Review Triggers in the North Pacific

The Policy Directive establishes the roles and responsibilities for NOAA Fisheries and the eight regional fishery management councils in reviewing allocations. The Councils are responsible for identifying fishery allocations within their region and determining what triggers are applicable for each.

In June 2017, the North Pacific Council received a discussion paper (NPFMC 2017b) describing this responsibly and a description of the CCC Procedural Directive on allocation triggers. The Council identified the allocations within the North Pacific region that would require reviewing (NPFMC 2017a). Most of the allocations established in the North Pacific were defined through the development of Limited Access Privilege Programs (LAPPs). Section 303A of the Magnuson-Stevens Act requires a program review five years after implementation and subsequent reviews at least every seven years after. The North Pacific Council determined the primary trigger for allocation reviews for LAPPs would be time-based and concurrent with required program reviews (NPFMC 2017a). LAPP reviews have many similar requirements in terms of evaluation of the program's ability to meet its original objectives, thus there are efficiencies to combining these efforts. The requirements for an additional allocation review would slightly expand the scope of what would need to be analyzed within the same document.

For the few allocations in the North Pacific defined outside of a LAPPs, (i.e., the Area 2C and 3A charter/commercial halibut CSP, as well as the GOA and BSAI Pacific cod sector allocations), the Council adopted a 10-year time frame as the primary trigger criteria for review although, as a secondary trigger, the public can request an allocation review prior to the established 10-year frequency. **The CSP was implemented January 2014; therefore, a review should be initiated by 2024. Given the busy schedule for upcoming LAPP reviews and Council interest, this Allocation Review is expected to be conducted on an earlier timeframe.**

3 Establishing a Scope for the CSP Allocation Review (Step 2)

In addition to the Policy and Procedural Directives, the scope of the CSP review will take into consideration: 1) other examples and previous SSC guidance (to guide the structure of the review); 2) the goals of the CSP (to guide content); and 3) the Halibut Act and other applicable law (to incorporate where relevant). In addition, public comment submitted in response to this workplan is intended to shape the scope of the review. This section concludes with some analyst comments on the proposed depth and scope as well as the range of decisions the Council could make relative to this review.

3.1 Examples of Allocation Reviews in the North Pacific

The structure of the proposed CSP Allocation review is based on the structure of previous Allocation Reviews in the North Pacific.

The first allocation review that occurred in the North Pacific region was for the Central Gulf of Alaska (CGOA) Rockfish Program. This review occurred as one section of the LAPP review (NMFS 2017a; Section 18). As this was the first review in the North Pacific region and the policy directive was new at the time, the SSC had a number of questions about intended scope and depth of allocation reviews. A letter to NMFS from the Council asked for this clarification.⁴

The response from NMFS emphasized that the Allocation Review is not meant to include in-depth analyses. It should assess if the FMP objectives are being met (assuming they are relevant and current) and discuss if other relevant factors (ecological, economic, social, catch, status, etc.) have changed enough to warrant an in-depth formal analysis of the allocation. If the objectives have been met and initial analyses suggest no major changes have occurred, then the allocation review (Step 2) is complete, and the process returns to Step 1. If the objectives are not being met and/or initial analyses suggest major changes

⁴ http://www.npfmc.org/wp-content/PDFdocuments/CM/2017/112717/11Nov_NMFS_RockfishAllocationReview.pdf

may have occurred, then the Council process for FMP amendments (reallocation action) is initiated. It is during Step 3 that the in-depth analyses are expected.

The first stand-alone allocation review in the North Pacific region was for the BSAI Pacific cod sector allocations (NPFMC 2019). During the discussion of the workplan, the SSC identified a series of dashboard metrics to facilitate the review. In particular, the review included dashboards with the following information for each of the nine BSAI Pacific cod sectors (to the extent it was not confidential):

- Sector allocation and harvest (including initial allocations, in-season reallocations and final allocations; CDQ/ non-CDQ breakouts and State of Alaska guideline harvest information)
- Vessel count and harvest
- Value data
- Halibut mortality (with additional PSC information provided)
- Port of delivery
- Reported vessel ownership address

The review also included broader perspective on the status of the Pacific cod stock and ecological impacts and a description of the management of the BSAI Pacific cod fishery. These metrics were connected back to the stated objectives of the sector allocations (implemented through Amendment 85) to aid the determination of their achievement.

While the commercial BSAI Pacific cod fisheries present a fairly different profile from the Area 2C and 3A charter and commercial CSP and there are differences in the type of relevant information that can be provided, the BSAI Pacific cod review can still serve as an example of the format for considering allocations under Step 2 of the Allocation Review.

3.2 Goals of the CSP

Part of the allocation review process is to evaluate whether the current allocation objectives are being met, whether the program objectives are still appropriate, or if they should be modified. This workplan proposes to include an evaluation of the current CSP objectives. During the Allocation Review, both the Council and stakeholders may identify whether the allocation objectives are still appropriate, or if they should be modified.

The final analysis for the Area 2C and Area 3A halibut CSP (NPFMC/NMFS 2013) identified the need to develop the CSP for the Area 2C and 3A charter and commercial halibut sectors to address conservation and allocation concerns that existed in both areas. These concerns resulted from increased harvests in the charter halibut fishery and decreased catch limits in the commercial setline fisheries.

Although the CSP program details changed from the time it was first proposed in 2007 until it was adopted in October 2012, the management objectives persisted. As stated at final action, the objectives were as follows:

In establishing this catch sharing plan for the commercial and sport charter halibut sectors, the Council intends to create a management regime that provides separate accountability for each sector. The management of the commercial sector remains unchanged under the plan, and new management measures are provided for the sport charter sector. These new measures for the sport charter sector are designed to address the specific need of the sport charter sector for advance notice and predictability with respect to the management tools and length of season that will be used to achieve the allocation allotted to that sector under the plan. In order to achieve

the allocation, it is the Council's intent that management tools and season length would be established during the year prior to the year in which they would take effect, and that the tools selected and season length would not be changed in season.

The Council will evaluate its success in achieving the sport charter sector allocation, and specific needs for predictability, advance notice, and season length each year, and will adjust its management tools as needed. In designing this regime for the sport charter sector the Council recognizes that providing advance notice and predictability may result in a charter harvest that does not precisely meet the sector allocation for that particular year. Therefore, the Council intends to adjust its management measures as needed to ensure that the sport charter sector is held at or below its allocation, recognizing that there may be annual overages or underages, so long as such overages or underages do not exceed [0, 5, or 10 percent⁵] of the charter sector allocations. In meeting its conservation mandate while accommodating the charter industry's need for predictability and stability, the Council will necessarily err on the side of conservation in the selection of management tools and season length, with the result that the sport charter sector may not be able to harvest its entire allocation.

Additionally, the Council adopted the following Problem Statement in June 2007, and reaffirmed the language in October 2007, December 2007, and April 2008.

The absence of a hard allocation between the longline and the charter halibut sectors has resulted in conflicts between sectors and tensions in coastal communities dependent on the halibut resource. Unless a mechanism for transfer between sectors is established,⁶ the existing environment of instability and conflict will continue. The Council seeks to address this instability, while balancing the needs of all who depend on the halibut resource for food, sport, or livelihood.

Based on this defined Problem Statement and management objectives, this Allocation Review will evaluate the program's progress in meeting the following objectives:

- (1) create a management regime that provides separate accountability for each sector;
- (2) management tools and season length should be established during the year prior to the year in which they would take effect, and that the tools selected, and season length should not change in season;
- (3) evaluate its success in achieving the sport charter sector allocation and specific needs for predictability, advance notice, and season length each year, and adjust its management tools as needed;

⁵ The Council did not include a specific overage/ underage policy in its preferred alternative in Oct 2012.

⁶ When the Council first adopted this Problem Statement in June 2007, it was considering a program that included a hard cap allocation with the potential for inseason charter management when the cap was met (i.e., the charter fishery could close down mid-season). At the time, the alternatives included a compensated reallocation alternative after the allocation was set, as a way to provide an option to keep the season open. The compensated reallocation component was conceived as either: 1) individual management; 2) Federal Common pool; 3) State Common pool; or, a 4) Regional non-profit association common pool. At the Oct 2007 Council meeting, management objectives pivoted to a strategy that called for charter management measures to be reviewed annually, with the goal of ensuring a season of historic length. This strategy also continued a consideration of an option for individual charter moratorium license holders (CHP holders) to lease commercial IFQ as Guided Angler Fish, as an individual mechanism to provide additional opportunities for clients (NPFMC 2007).

- (4) adjust management measures as needed to ensure that the sport charter sector is held at or below its allocation, recognizing that there may be annual overages or underages.

3.3 The Halibut Act and other Applicable Laws

The Northern Pacific Halibut Act of 1982 (Halibut Act) dictates the legal authority for managing halibut and highlights particular requirements for allocations. The requirements under the Halibut Act will be incorporated and evaluated in the Allocation Review where appropriate.

The IPHC and NMFS manage fishing for Pacific halibut through regulations established under authority of the Halibut Act. The IPHC adopts regulations governing the Pacific halibut fishery under the Convention between the United States and Canada for the Preservation of the Halibut Fishery of the North Pacific Ocean and Bering Sea (Convention), signed at Ottawa, Ontario, on March 2, 1953, as amended by a Protocol Amending the Convention (signed at Washington, DC, on March 29, 1979). For the United States, regulations developed by the IPHC are subject to acceptance by the Secretary of State with concurrence from the Secretary of Commerce. After acceptance by the Secretary of State and the Secretary of Commerce, NMFS publishes the IPHC regulations in the Federal Register as annual management measures pursuant to 50 CFR 300.62. IPHC and NMFS regulations authorize the harvest of halibut in commercial, personal use, sport and subsistence fisheries by hook-and-line gear and pot gear.

The Halibut Act, at Sections 773c(a) and (b), provides the Secretary of Commerce with general responsibility to carry out the Convention and the Halibut Act. In adopting regulations that may be necessary to carry out the purposes and objectives of the Convention and the Halibut Act, the Secretary of Commerce is directed to consult with the Secretary of the department in which the U.S. Coast Guard is operating, which is currently the Department of Homeland Security.

The Halibut Act at Section 773c(c), also provides the Council with authority to develop regulations, including some direction on establishing allocations:

(c) Regional Fishery Management Council involvement

The Regional Fishery Management Council having authority for the geographic area concerned may develop regulations governing the United States portion of Convention waters, including limited access regulations, applicable to nationals or vessels of the United States, or both, which are in addition to, and not in conflict with regulations adopted by the International Pacific Halibut Commission (IPHC). Such regulations shall only be implemented with the approval of the Secretary, shall not discriminate between residents of different States, and shall be consistent with the limited entry criteria set forth in section 1853(b)(6) of this title. If it becomes necessary to allocate or assign halibut fishing privileges among various United States fishermen, such allocation shall be fair and equitable to all such fishermen, based upon the rights and obligations in existing Federal law, reasonably calculated to promote conservation, and carried out in such manner that no particular individual, corporation, or other entity acquires an excessive share of the halibut fishing privileges.

Regulations developed by the Council may be implemented by NMFS only after approval by the Secretary of Commerce. The Council has exercised this authority in the development of subsistence halibut fishery management measures, codified at §300.65, the limited access program for charter operators in the charter halibut fishery, codified at §300.67, and the catch sharing plan and domestic management measures in waters in and off Alaska, codified at §§300.61, 300.65, 300.66, and 300.67. The Council also developed the Individual Fishing Quota (IFQ) Program for the commercial halibut and sablefish fisheries, codified at §679, under the authority of section 5 of the Halibut Act (16 U.S.C. 773c(c)) and Section 303(b) of the Magnuson-Stevens Act (16 U.S.C. 1801 *et seq.*).

Annual management measures are implemented each year through a cooperative management program among Alaska Department of Fish and Game (ADF&G) and the NMFS. The CSP determined that the ADF&G logbooks would be used as the primary data source for estimating charter halibut harvest.

While the Magnuson-Stevens Act and the National Standards do not define the legal authority for the management of halibut, they may provide a suitable rationale for allocation decisions. For instance, Appendix 1 of the Allocation Procedural Directive 01-119-02 lists out existing National Policy such as National Standards 1,4,5,8, and 9, which are particularly relevant to allocations as well as other NOAA guidance documents.

3.4 Comments on Proposed Scope and Council Decisions

Focus on the allocated sectors of interest

As described in Section 5.3, the first Allocation Review in the North Pacific region occurred for the CGOA Rockfish Program. As this was the first review in the North Pacific region and the policy directive was new at the time, the SSC had a number of questions about intended scope and depth of allocation reviews. The SSC wondered if the review was meant to focus just on those receiving an allocation under the Rockfish Program or whether the point was to consider reallocating GOA rockfish TAC across all fisheries that contribute to rockfish mortality (e.g., the small longline fishery, fisheries that have an incidental catch allowance for rockfish bycatch, and the Amendment 80 fleet.) Given NMFS Headquarters' response that the review is not meant to provide in-depth analysis on effects of allocations, but instead focus on allocation/ FMP objectives and the way the allocation is used by the allocated groups, the first two reviews have focused specifically on the allocated sectors.

Halibut is a valuable and meaningful resource to many user groups and given the coast-wide nature of the stock and the management process, halibut use is highly connected between user groups. Fishing mortality in sectors outside of the CSP and area apportionment decisions through the IPHC affect the resource available within the allocations. **Under this workplan the Allocation Review would provide a high-level overview of the resource management and basic information and trends from halibut user groups not included in the CSP but whose removals are accounted for through the management process (i.e., unguided recreational- including rental boats, subsistence, bycatch in the groundfish sectors). However, the intent would be to focus the bulk of the information provided in the Allocation Review on the "sectors of interest" for this allocation, i.e., the commercial and charter halibut sector in Area 2C and 3A, unless directed otherwise through the Council process.**

Council decisions that could be made following Step 2 of the review

As described in Section 3, after considering the Allocation Review the Council could ask for further analysis considering different allocation percentages of halibut in the commercial and charter sectors. This would trigger "Step 3" of the Allocation Review process and lead to more in-depth analysis on the implications of any proposed changes.

After reviewing the Allocation Review the Council could also initiate discussion papers or analyses to consider modifying other aspects of the CSP Program. While the point of the review is to focus on the allocation, this is also an opportunity to consider the program more holistically if the Council should choose. Similar to "Step 3" of an Allocation Review, this would require additional analysis to hone in on the impacts of the proposed change and allow for additional public comment.

Any broader programmatic changes that are within the Council's authority (for example, those involving other halibut user groups) could be considered after receiving the Allocation Review. This would also require a separate analytical process. However, as noted previously, the analysts intend to focus this

review primarily on the charter and commercial halibut sectors, the “sectors of interest”, unless directed otherwise through this scoping process.

4 Proposed Content

Below is a proposed annotated table of contents for the CSP Allocation Review.

Again, this stage of the Allocation Review is not meant to provide an in-depth analysis of the effects of the program. The intent is to provide information on how the allocation is being used in each sector with an opportunity for the public and the Council to consider whether to recommend changes to the allocation and/or program to better achieve the program’s objectives. The impacts of a different type of allocation would occur under “Step 3” of an allocation review in which specific changes are suggested.

The proposed outline would provide a high-level description of the of the way halibut is managed which would include basic information and trend on halibut use by the unguided/ subsistence/ bycatch sectors; however, unless directed differently, the dashboard metrics proposed would focus in specifically on the two sectors of interest - the commercial and charter halibut sectors in Area 2C and Area 3A.

1. Purpose of an allocation review/ brief overview of the NOAA Policy
2. Goals of the CSP and any additional objectives identified by the Council
3. The Pacific halibut resource
 - a. Summary of halibut distribution, IPHC assessment process, and stock status.
 - b. Summary of IPHC harvest policy and management process which results in the Area catch limits. This description would be broader than Area 2C and 3A and would include the catch limits or expected mortality in other areas and sectors (i.e., unguided recreational sector, subsistence, and bycatch). Analysts’ goal would be to keep this description succinct and non-technical, referencing more detailed and technical descriptions elsewhere.
 - c. Time series information on sector mortality limits (area total mortality, total constant exploitation yield, fishery constant exploitation yield for all areas and sectors), and how the resulting allocations established in Area 2C and 3A combined catch limits fit into this harvest policy paradigm.
4. Management process created by the CSP
5. Description of the allocation
6. Factors that went into that decision-making
7. Proposed dashboard of metrics

Similar to the BSAI Pacific cod Allocation Review, analysts propose to create a dashboard of metrics. The following metrics are proposed to provide information about the ways in which the two fleets derive benefits from, and are dependent upon, Pacific halibut, with an additional goal of keeping the review succinct and accessible, which has been a recommendation from the SSC in the past. **Analysts request that stakeholders and Council bodies consider and prioritize these or other metrics to include in the review (see below table).**

Throughout this review, we intend to use time series data from 2006 to the most recent year available, unless there is a specific reason to include a longer or shorter series. The CSP began in 2014; therefore, the proposed period would provide eight years of baseline data. Given the many years of development of the CSP, including the Council’s consideration of possibly incorporating the charter sector into the IFQ program (2001), and early attempts to implement a CSP that were later withdrawn (2007-2011), there may be no perfect baseline. However, this proposed baseline will provide us with substantial pre-CSP information to examine relevant trends. It will cover a time series through years of economic recession and the recent COVID-19 pandemic, as well as dating back to years in which the charter management measures were two halibut of any size for both Area 2C and 3A.

	Commercial halibut	Charter halibut
Catch limits and use	Limits and harvest in pounds for Areas 2C and 3A. Harvest by subarea (port of landing)	Limits and harvest in pounds for Areas 2C and 3A. Angler harvest and average weight by subarea. Reasons for overages, to the extent they can be identified.
Number of participating entities	Number of QS holders in Areas 2C and 3A (including CQE) Number of vessels in Areas 2C and 3A (including CQE)	Number of halibut charter businesses Number of CHP holders (including Community Quota Entity (CQE) and MWR permit holders) Number of anglers
Gross revenue generated directly from target species	Ex-vessel price and value of commercially-caught halibut Ex-vessel value per commercial vessel	A proxy could be price of halibut charter trip * angler days, with a caveat that this estimate may include other values derived by anglers
GAF usage	GAF conversion rates Pounds and number of fish transferred GAF permit holders and percent of self-transfers Number of self-transfers that reach the transfer caps Average price per pound and average price per GAF	
Diversification	Fisheries revenue diversification associated with vessel owners	Trips with multi-species retained
Communities	Port of landings QS holder community CQE communities with QS and harvest	Community or port where trip ended CHP holder community Harvest and effort of CQE permits

8. Discussion on the objectives of the allocation/ program and whether significant factors assessed in the CSP analysis have changed.

Appendix to the review: In June 2018, the Council (with the help of Council staff and the Social Science Planning Team) identified research priorities that could aid the discussion of a CSP allocation review. Specifically, five types of comparable information were identified: 1) marginal value, 2) economic impacts, 3) total value, 4) ethnographic research, and 5) information on the indirect impacts.⁷ Some recent and ongoing research has been produced around the concepts of marginal economic value in the charter halibut sector and economic impacts in the charter and commercial halibut sectors. An appendix could be included with the review that describes the concepts of the marginal economic value of halibut and economic impacts associated with charter and commercial halibut fishing and highlights some of the recent research relative to these concepts.

5 Next Steps

At this time, Council bodies and stakeholders should consider the scope and content proposed in this CSP Allocation Review workplan. The Council may suggest modifications to this workplan after additional input is provided. When the Allocation Review is presented to the Council at a future Council meeting, stakeholders may wish to prepare testimony on specific changes to the program. If the Council supports these changes (i.e., initiating ‘Step 3’), stakeholders are encouraged to continue their participation in what would likely constitute a regulatory amendment to the program.

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