



New England Fishery Management Council

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MEETING SUMMARY

Scallop Committee Meeting

Boston, MA
October 24th, 2018

The Scallop Committee met in Boston, MA on October 24th, 2018 to: 1) review analyses and recommend specification alternatives to be included in Framework 30, 2) review and consider potential measures to reduce fishery impacts, 3) provide input on potential scallop work priorities for 2019, and 4) discuss other business.

MEETING ATTENDANCE:

Vincent Balzano (Committee Chair), John Quinn (Council Chair), Jonathon Peros (PDT Chair), John Pappalardo, Roger Mann, Peter Aarrestad, Gene Martin, Travis Ford, Melanie Griffin, Peter Hughes, Melissa Smith, Rick Bellavance, Terry Stockwell.

Jim Gutowski, Scallop Advisory Panel Chair, was in attendance along with 13 members of the public.

MEETING MATERIALS:

1) [Meeting Agenda](#); 2) [Meeting Memo from Committee Chair, Mr. Vincent Balzano](#); *Framework 30 Documents*: 3a) [Framework 30 Decision Document](#), 3b) [Draft Framework 30](#), 3c) [Scallop Price Model](#), 3d) [2018 Fishery Performance](#), 3e) [Measures to reduce fishery impacts](#); 4) [Scallop Committee Meeting Summary, Sept. 14, 2018](#); 5) [Scallop Advisory Panel Meeting Summary, Sept. 13, 2018](#); 6) [Scallop PDT Meeting Summaries: July – October](#); 7) [Scallop PDT memo to the SSC re: 2019 and 2020 \(default\) OFLs and ABCs](#); 8) [Priorities: 2018 work items and potential 2019 work priorities for the Scallop FMP](#); 9) [Correspondence](#); and B1) [Economic simulations of prices and revenue](#).

The meeting began at 9:20 am. Vincent Balzano (Committee Chair) welcomed the Scallop Committee and members of the public to the meeting and briefly reviewed the agenda. Following introductions, Council staff reviewed meeting materials to support discussion and the list of upcoming meetings ahead of Council final action on Framework 30.

Council staff updated the group with SSC recommendations for 2019 and 2020 OFL and ABC estimates, noting the similarity between values approved for 2018. The decline between 2019 and 2020 estimates is attributed to the incredibly large 2012/2013 year classes recruiting to the fishery and the absence of strong recruitment in subsequent years. The FY2019 ACL was

estimated to be approximately 123 million lbs ($F=0.51$) and FY2019 spatial management options projected landings to total around 60 million lbs.

Staff summarized relevant highlights from information presented at the previous day's Joint AP/PDT meeting to inform a broader discussion around 2019 specifications:

- 2018 fishery data to date suggests LPUE has continued at high levels throughout the fishing year relative to recent years. Also, FY2018 average monthly ex-vessel prices by area for the LA and LAGC components trended down between April and June, but have been increasing since June. The combined average price in October appears to be slightly greater than \$10 per pound for both the LA and LAGC components
- SAMS projections from specification runs tasked by the Committee all use the same open bottom configuration, meaning DAS projections and total pounds coming from rotational areas can be “mixed and matched” to interpret a wider range of spatial management options than what the tasked projection runs offer.
- With regard to the NLS, roughly 38% of total 2018 biomass was observed in the NLS-S-deep and NLS-W. A comparison of recent VMS data (April-September 2018), VIMS survey data, and interpolated meat count contours shows that the part of the NLS-W with the highest biomass hasn't been fished yet in FY2018 (Figure 1).
- As of October 17th, 55% of expected FY2018 landings have been harvested (i.e. ~43 million lbs combined total between the LA, LAGC IFQ, and LA/LAGC IFQ combo components).
- Staff reviewed SAMS projection runs from Committee and Council tasking (Table 1), as well as a specifications matrix that can be used to ‘mix and match’ projected rotational landings and open area landings to best inform spatial management options for FY2019 (Table 2).
- Staff summarized information presented by Dr. Dvora Hart regarding open area fishing mortality relative to access area fishing mortality. Specifically, her perspective was that fishing mortality should be higher in access areas compared to open areas because older scallops and higher biomass are in access areas. She noted that many of the current specification alternatives being considered have open area F set higher than access area F.
- NMFS is in the process of expanding VMS preland notification requirements to include limited access open area trips.
- A proposed rule is expected to publish related to expanding the current GSC and SNE Scallop Dredge Exemption Areas, which could potentially broaden the range of where LAGC IFQ vessels can fish open trips. The proposed GB/SNE Scallop Dredge Exemption Area is shown in Figure 2.

Figure 1. Density per m2 of >75 mm scallops from the 2018 VIMS survey dredge relative to interpolated meat count contours (solid black lines) and VMS hours fished from April to September 14th, 2018.

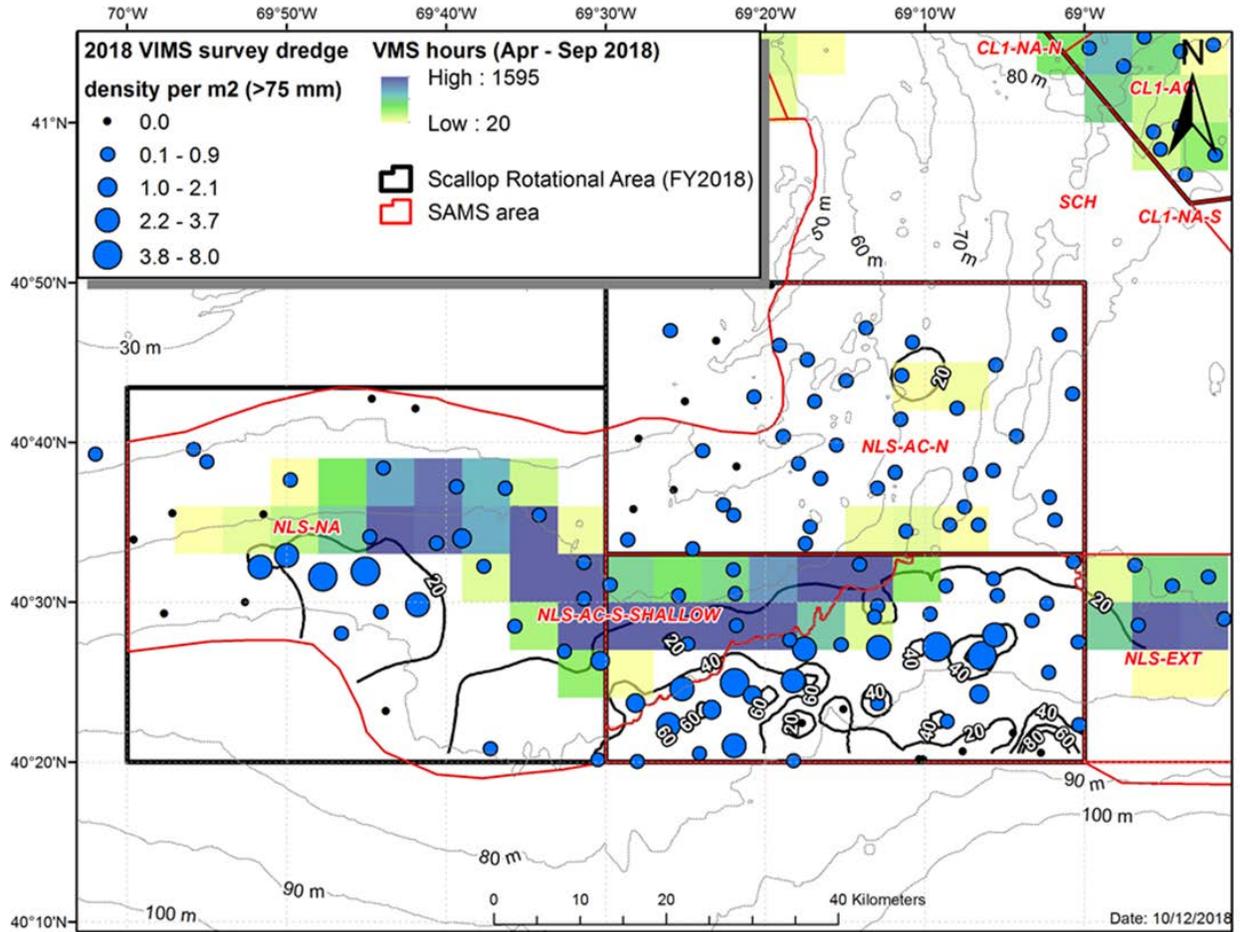


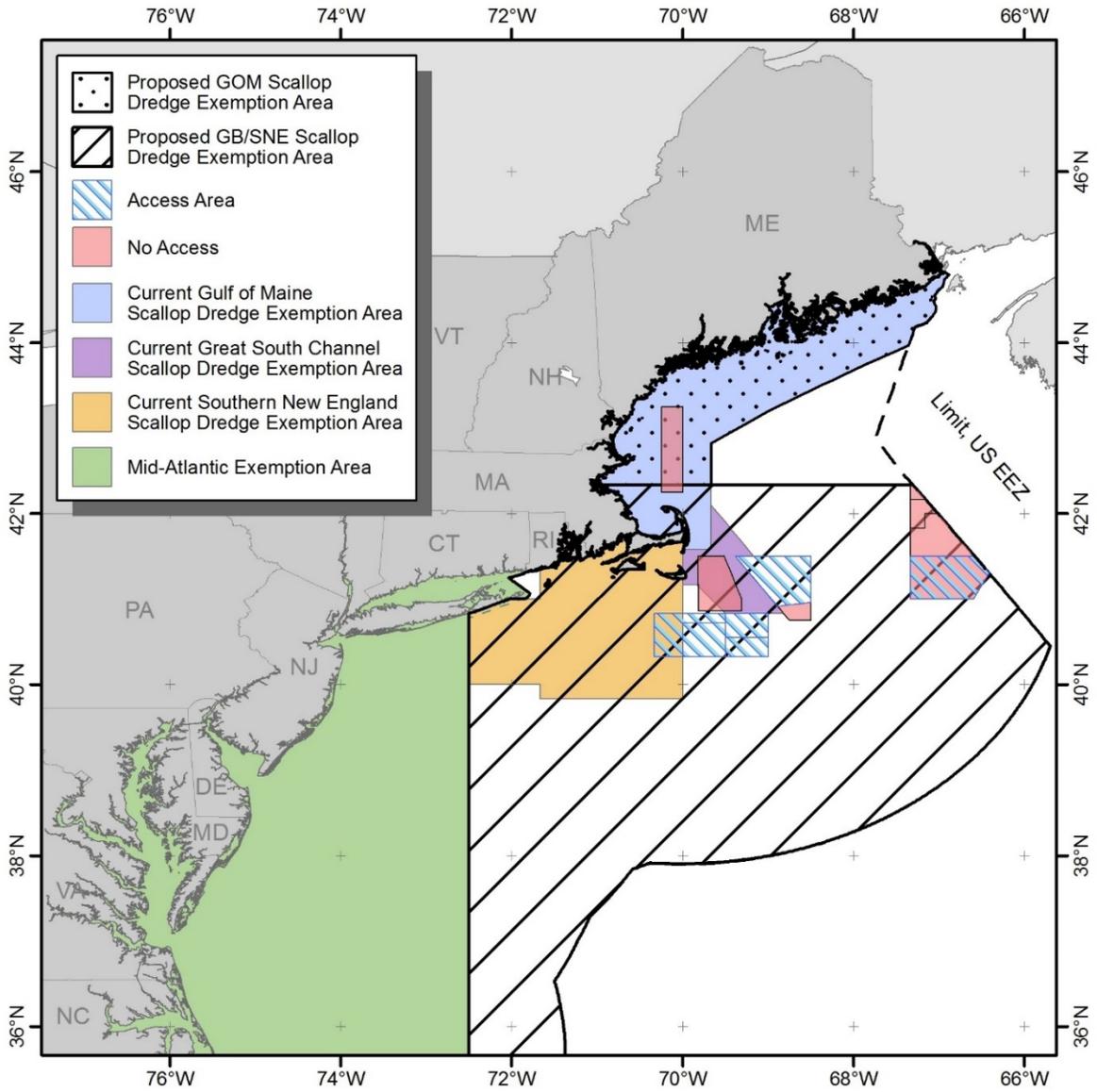
Table 1. SAMS projection model outputs for FY2019 specification runs tasked by the Committee/Council (see Doc.0 and Doc.3a).

		2. "Committee 1"	3. "Committee 2"	4. "Committee 3"	5. "Council"	6. "PDT"
	Spatial management	6 at 18,000 lbs; 1 CAI; 3 NLS-W; 2 MAAA	6 at 18,000 lbs; 1 CAI; 3 NLS-S&W; 2 MAAA	5 at 18,000 lbs; 1 CAI; 2 NLS-W; 2 MAAA	7 at 15,000 lbs; 1 CAI; 1 CAII; 3 NLS-W; 2 MAAA	7 at 15,000 lbs; 1 CAI; 3 NLS-W; 3 MAAA
a	Projected Landings (mil lbs)	61.6	65.5	62.8	61.0	57.6
b	APL after set-asides (mil lbs)	59.1	62.9	60.3	58.5	55.0
c	Open Area F	0.295	0.35	0.4	0.3	0.25
d	FT LA DAS	30	35	39	31	26
e	Open Area landings (mil lbs)	25.5	29.4	32.5	26	22.5
f	Rotational landings (mil lbs)	36.1	36.1	30.3	35.0	35.1
g	LAGC IFQ Quota (5%) (mil lbs)	3.0	3.1	3.0	2.9	2.8
h	Overall F	0.131	0.15	0.131	0.122	0.122
i	LPUE (AA + Open) - lbs day	2,931	2,879	2,801	2,912	2,999
j	LPUE-OPEN BOTTOM - lbs day	2,355	2,323	2,294	2,352	2,381
k	Total days at sea	21,031	22,752	22,429	20,955	19,194
l	Area swept - sq nm	2,635	3,100	3,467	2,846	2,336

Table 2. Specifications matrix showing combinations of open area F rates and rotational management scenarios. This matrix can be used to calculate the approximate landings by combining a "spatial management" scenario (columns) and associated harvest with estimated landings from open bottom (see Doc.0, Doc.3).

				i	ii	iii
				5 trips at 18,000 lbs - "Committee 3"	6 trips at 18,000 lbs - "Committee 1 & Committee 2"	7 trips at 15,000 lbs - "Council and PDT"
			Rotational landings (mil)	30 mil lbs	36 mil lbs	35 mil lbs
	Open Area F	FT LA DAS	Open Area landings (mil)			
a	0.25	26	22.5	52.5	58.5	57.5
b	0.295	30	25.5	55.5	61.5	60.5
c	0.3	31	26	56	62	61.0
d	0.35	35	29.4	59.4	65.4	64.4
e	0.4	39	32.5	62.5	68.5	67.5

Figure 2. The proposed GB/SNE and GOM Scallop Dredge Exemption areas being considered by NMFS relative to the current boundaries of Scallop Dredge Exemption Areas.



Discussion points:

- Following the staff presentation, a member of the Committee inquired as to the age structure of scallops in rotational areas. It was noted that the oldest animals are in Closed Area I and will be 9 years old in FY2019 and the dominant cohort in the NLS-West and NLS-S will be 7 years old.
- Discussion clarified that the configuration of Closed Area I Access Area being considered in specification alternatives follows the same configuration as in FW29 (i.e. combination of the traditional access area and former CAI-NA-N habitat closure).
- A member of the Committee commented on the incredibly high densities of scallops that were observed in the NLS-S-deep relative to other parts of the resource.

2019 Specifications Discussion

In addition to 2019 specifications alternatives, staff briefly reviewed the items in FW30 that the Committee may consider providing input on, such as 2020 default measures, setting the NGOM TAC, clarifying the access area fishing timeline, and how LAGC trips are allocated with a flex trip option.

Motions from the AP meeting were reviewed starting with those focusing on 2019 specifications. Questions and discussion points from the Committee included:

- A member of the Committee asked for clarification around the PDT recommendation of a 15,000-pound trip in Closed Area I. The PDT noted that the fishing mortality associated with an 18,000-pound trip in CAI in FY2019 would be higher relative to other rotational areas and based their recommendation of being conservative in CAI to avoid over allocating to this area if FY2019 projections are overly optimistic.
- A member of the public noted that yellowtail flounder bycatch has been very low in CAI so far in FY2018. Due to the expectation of continued low yellowtail bycatch and the older cohort of animals in the area, he supported fishing Closed Area I in FY2019.
- Jim Gutowski (AP Chair) provided more rationale on the AP interest in allocated a flex trip to Closed Area I. Specifically, the AP was supportive of having a backstop in place in case fishing in CAI does not meet expectation. Being able to fish outstanding CAI allocation in other available access areas in FY2019 would also prevent the CAI carryover issue addressed in FW29.
- There was some Committee discussion on the administrative mechanics of a flex trip (i.e. if it could be traded, how it would be enforced).

Motion 1: Stockwell/Pappalardo

Task the PDT with developing AP motions 1, 2, 3, 5, 6, 7, 8 for development in FW30. See full text below:

AP Motion 1:

Task the PDT to develop a specifications alternative in FW30 that follows the “PDT” run:

- Set FT LA trip limit at: 15,000
- Allocate (7) access area trips to the following areas:
 - 1 trip in CAI
 - 3 trips in NLS-W (NLS-N and NLS-S would be closed)
 - 3 trips in MAAA
- Include open area F options setting:
 - F=0.25, 26 DAS

Rationale: Supportive of the open area F of F=0.25. CAI will need to be fished at a higher F to achieve a 18,000 lb FT LA trip. Closed Area II would be closed.

AP Motion 2:

Task the PDT to develop a specifications alternative in FW30 that would:

- Set FT LA trip limit at: 18,000
- Allocate (7) access area trips to the following areas:
 - 3 trips in NLS-W (NLS-N and NLS-S would be closed)
 - 3 trips in MAAA
 - 1 flex trip that could be taken in CAI, NLS-W, MAAA. Entire trip would be fished in the area selected.
- Include open area F options setting:
 - F=0.25, 26 DAS

Rationale: Option to allow fleet to work in multiple areas, and move to areas with high production. Flex option could provide relief in CAI to allow for some 18,000 lbs in the area. Price has been steady in 2018, not effected as much as was expected with increase in landings. 18,000 lb trip limit is what the fishery has been at for some time.

AP Motion 3:

Recommend that the Committee add a DAS sub-option of Motion 2:

- Set open area DAS at 24 (and calculate the corresponding F)

Rationale: This would be add a DAS sub-option to AP Motion 2.

AP Motion 5:

The AP recommends that allocated access area trips be available in the area they were allocated to in the first 60 days of following FY.

Rationale: To clarify support for allowing fishing unused access area trips during the first 60 of the new fishing year, even if the access area is scheduled to close.

AP Motion 6:

The AP recommends that the Committee include default measures for 2020 in FW30 that would allocate 1 access area trip in the MAAA and 1 access area trip in the NLS-West at the trip limit specified for 2019 FY.

Rationale: Make sense to continue the fishing year. This allows folks to make business plans, and provides more flexibility. This would include access area trips for the GC component.

AP Motion 7:

Allocate the total available LAGC IFQ access area trips that would be associated in Motion #2 using the following ratios for each area:

- 1/7 in the CAI
- 3/7 in MAAA
- 3/7 in NLS-W

AP Motion 8:

Task the Committee to develop NGOM TAC options in FW30 using the following approach:

- Maintain the same approach to TAC setting in the NGOM in 2019 and 2020 for the LA and LAGC components that was developed and implemented through FW29.
- Develop TAC options based on fishing the following NGOM areas at F=0.2, F=0.25:
 - Stellwagen Bank
 - Jeffreys Ledge
 - Ipswich Bay

Rationale: Do not expect fishing on Platt's Bank. Anticipate fishing in other areas, but support being conservative. Stellwagen will probably see the bulk of the activity. Some areas of Stellwagen will be fished.

The motion carried on a show of hands (10-0-0).

There was no discussion on Motion 1.

Motion 2: Hughes/Mann

Task the PDT to develop a specifications alternative in FW30 that would:

- Allocate (7) access area trips to the following areas:
 - 1 flex trip that could be taken from CAI (15,000). Those pounds could be harvested from NLS-W or MAAA. Entire trip would be fished in the area selected.
 - 3 trips in NLS-W (NLS-N and NLS-S would be closed) (18,000 lb trip limit)
 - 3 trips in MAAA (18,000 lb trip limit)
- Include open area F options setting:
 - 24 DAS (calculate corresponding open area F)

Rationale: Reduction in DAS to account for increase in rotational harvest. The lower trip limit in CAI would be to reduce the overall harvest from the area. The Flex is not tradable.

The motion carried on a show of hands (11-0-0).

Discussion points:

- It was noted that administering access area allocations at different possession limits is possible but requires more attention for enforcement to ensure compliance.
- Jim Gutowski explained that the AP did not discuss this option in detail due to the concern that varying trip limits would impede the ability for access area trips to be traded among vessels GARFO staff noted that trading has only been allowed in the past for full trips at equal increments; however, it would be possible to adjust the regulations to allow for full trips at different increments to be traded if need be.
- Several members of the audience supported further exploring the flex trip option.
- Committee Chair noted that staff and the PDT will explore options related to the administration and mechanics of a flex trip that facilitate equity among the fleet.

Measures to Reduce Fishery Impacts

Council staff presented relevant background information and PDT input to date regarding measures in FW30 that reduce fishery impacts. Typically, alternatives have been included in annual specifications actions that direct where RSA compensation fishing can and cannot occur. In FW30, as it has in recent actions, the Council may wish to restrict compensation fishing in some areas to reduce impacts on small scallops, bycatch, or to limit overall harvest from an area. PDT recommendations to date on this topic included:

- Restrict compensation fishing in CAI due to potential impacts on available biomass.
- Restrict compensation fishing in CAII AA (i.e. if available to the scallop fishery in FY2019) to mitigate bycatch of GB yellowtail flounder.
- Allow RSA compensation fishing in all other available access areas (i.e. most likely NLS-W and the MAAA) and open bottom.

- As was done in FW29, allocate the LA share of the NGOM TAC as RSA compensation pounds, which would cap LA removals from the NGOM.

At the September 28th, 2018 meeting, the PDT discussed the considerably lower GB yellowtail sub-ACL anticipated for the scallop fishery in FY2019. Considering this, and how in-season VMS monitoring showed consistent fishing in CAII-ext (i.e. an area known for higher GB yellowtail bycatch relative to other parts of Georges Bank), the PDT put forth the following recommendations:

- The initial PDT proposal was to consider extending the current seasonal closure in CAII AA (August 15th to November 15th) to cover CAII-ext.
- Restrict RSA compensation fishing in CAII and CAII-ext to reduce impacts on GB yellowtail.

Staff briefly reviewed recent GB yellowtail discard information from observed hauls to expand PDT discussion around extending the CAII AA seasonal closure to CAII-ext. Methods, caveats, and key findings presented to the AP/PDT included:

- NEFOP records from March 1st, 2017 to August 24th, 2018 (i.e. most recent available) were used to estimate GB yellowtail discard to kept ratio (d/K) by ten-minute square on a bi-weekly basis.
 - This time period was used to gauge a reasonable expectation of GB yellowtail bycatch in the near future.
- CAII-ext was closed in FY2017 and turned into open bottom in FY2018. Since FY2018 data is available only through August 24th, observer records are not available to inform expected bycatch in CAII-ext after this time. It was suggested that comparing d/K figures to FY2018 VMS information may allow for some reasonable inferences to be made on seasonal GB yellowtail bycatch.
- Little to no GB yellowtail bycatch was observed in CAII-ext during August 1st-15th or August 16th-31st. Some GB yellowtail catch was observed in the SF SAMS area during August 1st-15th; however, little to no bycatch was observed in the SF during August 16th-31st, September 1st-15th, or September 16th-30th.
- Though no recent NEFOP records in CAII-ext are available for November 16th-30th, this time period appears to have higher GB yellowtail bycatch in CAII AA relative to other time periods considered in analysis. It was suggested that this trend could be expected to some extent in CAII-ext, a theory which was supported by analysis prepared for FW29 that showed GB yellowtail bycatch to be at its highest in CAII-ext between September and December.
- From April to mid-September 2018, 27% of all scallop fishery effort has been directed in and directly adjacent to CAII-ext. Staff suggested that if this trend continues in FY2019, there may be a reasonable argument to consider a seasonal closure in CAII-ext as well as restricting RSA compensation fishing there to mitigate bycatch of GB yellowtail.

Discussion points:

- A member of the Committee and several members of the audience did not support a seasonal closure in CAII-ext for FY2019.
- A member of the audience had felt that a seasonal closure in CAII-ext would not significantly reduce bycatch of GB yellowtail due to there being very little GB yellowtail in CAII-ext to begin with. He also suggested that a seasonal closure in CAII-ext might displace open area effort into other parts of the resource with high windowpane prevalence.

Motion 3: Hughes/Stockwell

Develop alternatives in FW30 that would:

1. Allow RSA fishing in NLS-West, MAAA, and open bottom.

Rationale: RSA compensation fishing would not be allowed in other access areas, even if they are open.

The motion carried on a show of hands 11-0-0.

2019 Priorities Discussion

Council staff gave a brief overview of the status of ongoing 2018 work priorities, as well as the current list of priorities being considered for 2019 (Table 3). The following points summarize Committee discussion regarding AP input of 2019 priorities:

- It was noted that the AP did not include NGOM management measures on the list of 2019 priorities. Staff explained that a member of the AP urged this item be address at sometime in the near future and recalled past Committee discussion about not punting this priority down the road.
- With regard to the AP interest in including “East Coast Scallop Harvest Association – problems and challenges in fishery”, a member of the Committee suggested that those interested want the Council to mimic “scoping” efforts already done and described in correspondence (see Doc.9). They did not support this priority as an action item for 2019.
- Another member of the Committee did not support including “East Coast Scallop Harvest Association – problems and challenges in fishery”, because they felt that it was an attempt to allow the consolidation of permits within the LA component.
- The Committee discussed modifying the description of this priority since the Council would be the body that recommends priorities.
- A member of the Committee felt it important to address modifying the LAGC IFQ trip limit in the near term but cautioned including this item in an Amendment as it might impede a modest increase of the possession limit on a short timeline. They further noted that the

current analysis around this priority is narrowly bounded and suggested a modest trip limit increase could be handled in a framework.

Motion 4: Stockwell/Smith

Recommend the following work items as 2019 Priorities (in rank order):

- Specification package (legal requirement)
- Action to mitigate impacts on yellowtail flounder
- Framework to address LAGC IFQ trip limits
- Amendment to address LAGC IFQ issues, NGOM issues
- Action that considers modifying access areas:
 - 1 – Modify access areas to be consistent with OHA2 (Eastern Georges Bank)
 - 3 – Harvest of slow growing scallops
 - 6 – Evaluation of rotational management

Rationale: Consider mitigating measures for GB YT to ensure that the scallop fishing has access to CAII in 2020. Put the NGOM and IFQ issues together and completed to turn attention to the LA component of the fishery. Bundling other related issues to advance forward in the same action (1,3,6).

Motion to amend (5): Hughes/Sissenwine

Recommend the following work items as 2019 Priorities (in rank order):

- Specification package (legal requirement)
- Action to mitigate impacts on yellowtail flounder
- Framework to address LAGC IFQ trip limits
- Amendment to address LAGC IFQ issues, NGOM issues
- Action that considers modifying access areas:
 - 1 – Modify access areas to be consistent with OHA2 (Eastern Georges Bank)
 - 3 – Harvest of slow growing scallops
 - 6 – Evaluation of rotational management
- Address problems and challenges in the scallop fishery considered at the October 23, 2018 AP meeting.

Rationale: Consider mitigating measures for GB YT to ensure that the scallop fishing has access to CAII in 2020. Put the NGOM and IFQ issues together and completed to turn attention to the LA component of the fishery. Bundling other related issues to advance forward in the same action (1,3,6). Examples of problems and challenges in the LA fishery include but are not limited to an aging fleet, aging crew, flexibility, and inefficiencies.

The motion to amend carried on a show of hands 11-0-0.

The main motion as amended carried on a show of hands 10-0-1.

Discussion points:

- A member of the Committee supported the intent of the motion but felt the LAGC trip limit item should be handled in a standalone action because it is a narrow issue that should no longer be pushed aside by the Council. They noted that this item has been discussed for two years and felt that the analysis developed during 2018 suggested a modest increase (i.e. later defined as 900 lbs) could be achieved in a narrowly bound framework.
- NOAA General Counsel explained that an Amendment is the best vehicle to address modifying the LAGC trip limit because it takes away any limits of “crossing the line” that might be associated with a Framework and allows for a complete assessment at all alternatives being considered. He further noted that modifying the trip limit could be done in a Framework if it were very constrained and limits the scope of alternatives considered.
- Several other Committee members voiced support for the items in Motion 4 but also felt the LAGC trip limit issue should be handled in a narrowly bounded framework as opposed to a larger combined Amendment. Ultimately the maker of Motion 4 felt it appropriate to add a line item in 2019 priorities re: a FW to address a modest increase to the LAGC possession limit (not part of the original motion).
- A member of the public felt that “East Coast Scallop Harvest Association – problems and challenges in fishery” should be prioritized for 2019 based on input received from industry members at recent port meetings. Examples provided of issues to be addressed in the fishery were crew conditions, safety at sea, drug use, and having too much steel at the dock.
- A member of the public suggested prioritizing development of a mechanism that would allow for access area effort to be shifted if an issue arises inseason. He also felt it important to develop transplanting options if another large year class of animals were to settle in sub-prime habitat such as the current slow-growing year class in the NLS-S-deep.
- A member of the public spoke in strong opposition to prioritizing two separate actions that address LAGC fishery issues, suggesting resources would be better spent on work items that benefit the fishery as a whole such as specifications and gaining access to Eastern Georges Bank.
- A member of the public cited the range of industry members in support of the “East Coast Scallop Harvest Association – problems and challenges in fishery” and felt that addressing the issues raised at recent port meetings should be top priority for the Council.
- Regarding Motion 5, many Committee members and several members of the public felt it important to include a priority that begins discussion around issues in the fishery that were discussed at the previous day’s AP meeting.

Other Business

A member of the Committee provided input on the following three items:

- 1) He felt it important to develop a general protocol with control rules that dictate how management should respond to different types of issues as they come up in the future, for example, if another large set of scallops set in an area of sub-optimal habitat (i.e. such as those currently in the NLS-S-deep).
 - Staff suggested flagging this topic for discussion at the Council and referenced the risk policy developed by the Council that follows a similar train of thought. It was also suggested this be a potential RSA priority in the future.
 - Another Committee member found merit in the idea and suggested developing a structured template in the form of an MSE that provides management guidance based on modelled outcomes of a range of decisions in a given scenario.
- 2) The second discussion point regarded how issues are currently handled in the fishery and felt that the process would greatly benefit from having a guidance document as a result of an MSE to base decisions on. He felt that current management is directed on a short-term strategic plan and noted the anomaly of a half-a-billion-dollar per year industry (i.e. the scallop fishery) lacking a strong 5 to 10-year strategic plan. He further cited that an MSE could serve as a long-term strategic plan for the fishery and urged the importance of describing this need to the Council.
- 3) The third discussion point recommend greater transparency in the projection and economic model process that specifications are based on. It was noted that only one person is running the projection and economic models at the Northeast Fisheries Science Center and Council, and suggested that the process could be improved by training additional staff in running these models, and potentially integrating the two. The Committee was in support of this recommendation and put for the consensus statement below.

By consensus: The Committee requests that the Council request that the NEFSC allocate more resources to support the scallop fishery. The Committee is concerned about workload and redundancy to protect against unforeseen events.

Note that the GARFO staff abstained from the consensus discussion.

Motion 6: Hughes/Mann:

Recommend that the Committee recommend that the Council initiate a FW to address:

- Harvest of slow growing scallops in Nantucket Lightship-South-deep

Rationale: These scallops are not growing normally and additional measures would need to be developed to successfully harvest them.

The motion was withdrawn without objection.

Discussion points:

- Overall the Committee agreed with the intent of the motion but felt that it should be considered after 2019 priorities are discussed by the Council in December. The maker of the motion agreed and withdrew the Motion without objection.

No other business was discussed. The meeting adjourned at 1:53 PM.