

St. George Office:



P.O. Box 929  
St. George, Alaska 99591-0929  
Tel: (907) 859-2263  
Fax: (907) 859-2212

Mr. Dan Hull  
Chairman  
North Pacific Fisheries Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501  
[npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

January 31, 2018

**Re: E2: Ecosystem Committee Report**

Dear Chairman Hull and Council Members:

I am writing on behalf of the City of St. George, Alaska and its City Council in response to the North Pacific Fisheries Management Council's (the Council's) direction to the Ecosystem Committee to identify ways for Bering sea communities to provide inputs to the Council regarding ecosystem issues and concerns.

We are grateful to the Council for encouraging the Ecosystem Committee to expand efforts to include community inputs about ecosystem issues and concerns. We appreciate the willingness and enthusiasm of the Council and staff to engage with communities and incorporate local and traditional expertise and knowledge (LTK) into documents in current review, such as the Bering Sea Fisheries Ecosystem Plan (FEP), and other decision-making and management processes in the future. We also appreciate the forthcoming opportunity to present our views to the Committee. We look forward to working with Council staff to identify effective ways to gather inputs from Bering Sea communities, to identify potentially affected communities, and to consider additional forums and opportunities for our and those communities to provide ecosystem information.

LTK, also known as Indigenous Knowledge, is widely recognized as an invaluable, long-term body of dynamic and complex knowledge that lives within peoples and communities with shared experiences and histories. LTK is directly relevant to the Council's management of fisheries. The community members of St. George and St. Paul depend on marine resources and together hold a vast body of local and traditional knowledge of our region. We have been deeply and irreversibly impacted by profound ecosystem-level changes to our marine environment. Our observations about changes to the resources we live with and depend on, and the impacts and effects of these changes, offer great potential to enrich the Council's decision making about fisheries management.

On the Pribilof Islands, we have extensive knowledge about, among other things, Steller sea lions, northern fur seals and seabird populations; sea ice patterns and deviations from historical trends over time; changes in abundances and distributions of boreal and sub-Arctic marine species; declining access to marine resources; emigration of residents due to loss in fishing opportunities and economies; increased coastal erosion in important subsistence and cultural sites; changes in animal behaviors; and the spatial and/or temporal mismatch of prey and predator species during warm years. Our communities are keenly aware of what activities like increased oil and gas exploration and trans-Arctic shipping mean for our wildlife, ecosystems, and communities.

We hold specific, legally recognized roles as co-managers of resources like Steller sea lions and northern fur seals. It is essential from our perspective, therefore, that we have an equitable and active role in the policy and management decisions that impact our people, our families, our communities, and our traditional culture and way of life.

Although the scientific and resource management communities recognize its value and importance, LTK remains an underused resource in Alaskan policy and fisheries management decision making. The familiar disciplinary approaches utilized in research and management have most often not yet developed specific mechanisms for integrating LTK in a meaningful and consistent way. The Council has the opportunity to help lead the way in this effort.

The opportunity to present information to the Council and Ecosystem Committee in an important step in this direction. Beyond issues of equity and fairness, the inclusion of LTK in Council decisions will yield important practical benefits. Identifying mechanisms to incorporate LTK is a fundamental component of creating a meaningful Bering Sea FEP. More generally, our communities can provide not only concrete information but also valuable perspective on information, i.e., knowledge, relevant to fisheries science, management and policy. We believe sharing our knowledge can help the Council to be supportive of our community development visions and to minimize the risks of unintended policy consequences, while meeting its own mandates and objectives.

We would also encourage the Council to take the following additional steps:

- Engage with tribal/community networks and conferences such as the Alaska Tribal Conference on Environmental Management and Alaska Forum on the Environment. These conferences present excellent opportunities to meet with community leaders and participate in the two-way sharing of information.
- Encourage the Social Science Planning Team (SSPT) to build stronger and wider networks aimed at establishing regular, two-way communication with communities. The SSPT is well positioned to gather community inputs on relevant issues and to help improve management and decision-making.
- During the December meeting of the Ecosystem Committee, Co-chairman Tweit asked Council staff about potential collaboration with Landscape Conservation Cooperatives (LCCs) regarding incorporation of traditional knowledge. The LCC's have built a vast network of stakeholders committed to applied conservation science, including the application of LTK in policy and management decisions. We recommend that the Council and the Bering Sea FEP team seek direct collaborations with the LCC Coordinators, who have established strong partnerships to address many of the Bering Sea's resource management concerns.

Thank you for the opportunity to share our views. We strongly encourage the Council to continue to seek more active involvement by communities affected by fisheries management decisions, and we welcome the opportunity to work with you toward our shared goal of healthy and productive Bering Sea ecosystems.

Sincerely,



Patrick Pletnikoff, Mayor  
St. George, Alaska



2050 VENIA MINOR ROAD  
P.O. BOX 86  
ST. PAUL ISLAND, ALASKA 99660

February 2, 2018

Mr. Dan Hull  
Chairman  
North Pacific Fisheries Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501  
[npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

**Re: E2: Ecosystem Committee Report**

Dear Chairman Hull and Council Members:

The Aleut Community of Saint Paul Island, a federally recognized Indian tribe located on the Pribilof Islands, submits the following comments in response to the Council's direction to the Ecosystem Committee to discuss ways for Bering sea communities to provide input to the council with ecosystem issues and concerns.

First, we would like to thank the Council for directing the Ecosystem Committee to expand efforts to include community input about ecosystem issues and concerns. We appreciate the willingness and enthusiasm of the Council and staff to engage with communities and effectively incorporate local and traditional expertise and knowledge (LTK) into documents in current review, such as the FEP, and other decision-making and management processes in the future. We also appreciate the opportunity to make a presentation and look forward to working with staff to identify effective ways to gather input from Bering Sea communities, identify potentially affected communities, and consider forums for those communities to provide ecosystem information.

The community members of St. Paul and St. George together hold a vast body of local and traditional knowledge of our region. The communities have not just passively watched changes occur around them. We are part of these changes, having experienced them first-hand, and we have been deeply and irreversibly impacted by ecosystem level changes, especially those in the marine system. This kind of information, called Indigenous Knowledge or Local and Traditional Knowledge (LTK) has long been recognized as a valuable source of dynamic and complex knowledge that lives within peoples and communities with shared experiences and histories. LTK is directly relevant to the Council's management of fisheries, and the impacts and effects our communities are witnessing are important factors to be considered by the Council in making decisions about fisheries management.

On the Pribilof Islands, we have knowledge about, among other things, Steller sea lion, northern fur seal and seabird populations; sea ice patterns and deviations from historical trends over time; changes in abundances and distributions of boreal and sub-Arctic marine species; declining access to marine resources; emigration of residents due to loss in fishing opportunities and economies; increased coastal erosion in important subsistence and cultural sites; changes in animal behaviors; and the spatial and/or temporal mismatch of prey and predator species during warm years. Our communities are keenly aware of what activities like increased oil and gas exploration and trans-Arctic shipping mean for our wildlife, ecosystems, and communities. In addition, we hold specific, legally recognized roles as co-managers of

OFFICE OF THE PRESIDENT

resources like Steller sea lions and northern fur seals. As such, we wish to have an equitable and active role in the policy and management decisions that impact our people, our families, and our communities.

Unfortunately, few concrete examples, beyond mere documentation, exist of the application of LTK in resource management and policy in Alaska. The scientific and resource management communities know LTK exists and recognize its importance. However, the familiar disciplinary approaches we utilize in research and management do not have a concrete way to apply LTK in a meaningful and tangible way.

The Council has the opportunity to help lead the way in this effort. The opportunity to present information to the Council and Ecosystem Committee in an important step in this direction. Further, identifying mechanisms to incorporate LTK is a fundamental component of creating a meaningful Bering Sea Fishery Ecosystem Plan (FEP).

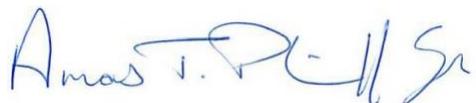
In addition, the Council can take advantage of related discussions within tribal/community networks, such as at conferences like the Alaska Tribal Conference on Environmental Management (ATCEM) and Alaska Forum on the Environment (AFE). Many tribes send staff to these conferences and these venues present incredible opportunities for two-way outreach and sharing by Council staff and/or Plan Team members.

Additionally, the Council can encourage the Social Science Planning Team (SSPT) to reach out directly and build stronger and wider networks aimed at improving regular and two-way communication with communities. The SSPT can more actively seek to utilize community-driven approaches gather input on relevant issues at the beginning of the process. We recognize that this is not a small feat, but it would overall improve management and decision-making in the future.

Finally, during the December meeting of the Ecosystem Committee, Co-chairman Tweit asked Council staff about potential collaboration with the Landscape Conservation Cooperatives (LCCs) regarding inclusion and incorporation of traditional knowledge. We recommend that Council and Bering Sea FEP team initiate a conversation with the LCC Coordinators. The LCC networks that collaborate in the Bering Sea (i.e., Aleutian Bering Sea Islands [ABSI] and Western Alaska LCCs) have built a vast network of committed federal and state agencies, tribes, industry representatives, non-governmental organizations, universities and other stakeholders that are highly committed to applied conservation science, including the application of LTK in policy and management decisions. Despite potential funding challenges, the 5 LCC partnerships met in November 2017 and are committed to continuing their collaborative work together. We advocate for the Council to seek more direct collaborations with the LCC Coordinators, who have already established strong partnerships to address many of the resource management concerns throughout the Bering Sea.

Thank you for the opportunity to submit these comments. We truly hope the Council will continue to seek more active involvement by communities affected by fisheries management decisions, including those that are not currently engaged in the Council process. We also encourage the Council and staff to leverage representatives those tribal and community members that are already actively engaged in the Council process in order to fully utilize an existing tribal network.

Sincerely,

A handwritten signature in blue ink that reads "Amos T. Philemonoff, Sr." The signature is written in a cursive style with a large, stylized 'A' and 'S'.

Amos T. Philemonoff, Sr.  
President, Aleut Community of St. Paul Island



# Central Bering Sea Fishermen's Association

P.O. Box 288 | Saint Paul Island, Alaska 99660 | Phone: 907.546.2597 | Fax: 907.546.2450 | cbsfa.com

February 1, 2018

Mr. Dan Hull  
Chairman  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, AK 99501  
[npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

**Re: E2: Ecosystem Committee Report**

Dear Chairman Hull and Council Members:

We are writing in support of the comments from the Tribal Government of St. Paul Island regarding the North Pacific Council's Ecosystem Committee and its efforts to include community perspectives.

The Central Bering Sea Fishermen's Association (CBSFA) is the management organization for St. Paul Island under the Western Alaska Community Development Quota Program. CBSFA's mission is to develop a viable, self-sustaining, independent fisheries development organization that, on behalf of the local fishermen, and the community of St. Paul as a whole, and in cooperation with other Bering Sea Coastal Communities and CDQ groups, will ensure key participation in fishery related development in the region while exercising proper resource stewardship.

As such, CBSFA is vitally interested in the health of the Bering Sea ecosystem, and management policies that preserve the ecosystem and marine resources. We appreciate the direction and willingness of the Council and the Ecosystem Committee to work with the entities of St. Paul (and St. George) to find meaningful ways for the community members to provide ecosystem information.

The communities hold a vast body of local and traditional knowledge of our region. To echo the comments from the Tribal Government, this kind of information, called Indigenous Knowledge or Local and Traditional Knowledge (LTK) has long been recognized as a valuable source of dynamic and complex understanding that lives within peoples and communities with shared experiences and histories. LTK is directly relevant to the Council's management of fisheries, and the impacts and effects our communities are witnessing are important factors to be considered by the Council in making decisions about fisheries management.

We thank the Council for directing the Ecosystem Committee to expand efforts to include community input about ecosystem issues and concerns. With this step, we believe this Council is leading the way in incorporating LTK into policy decisions, particularly as the Council and Ecosystem Committee formulate the Bering Sea Fishery Ecosystem Plan (FEP).

Finally, we encourage the Council and Committee members and staff to make good use of the ample resources on the Pribilof Islands and beyond. The Tribe's comments listed a number of existing and effective processes and forums that can be of real assistance in identifying affected Bering Sea communities, and gathering input and ecosystem information from those communities.

CBSFA is fully engaged in the fishery management process and represents the community of St. Paul's investments in healthy and sustainable fisheries. To help manage those resources for the benefit of our community – and other communities not currently as involved in the Council process – we endorse the Council's continued efforts to seek more active involvement by communities affected by their fisheries management decisions.

Sincerely,



Phillip Lestenkof, President