

## PROPOSAL RE: AMENDMENT 113

**Submitted Jointly By:** ACDC, APICDA, City of Atka, City of Adak, The Aleut Corporation, Golden Harvest Alaska Seafood

### Problem Statement

The Final Rule implementing Amendment 113 established a priority for vessels delivering shoreside by creating the Aleutian Islands Catcher Vessel Set-Aside, among other actions.

Further refinement of the regional landing requirements adopted in Amendment 113, which will decrease the risk to the historic share of BSAI cod for communities that depend on shoreside processing in the Aleutian Islands, is needed to achieve the Council's full intent.

### Alternatives

**Alternative 1:** No Action

**Alternative 2:** If the Aleutian Islands Catcher Vessel Harvest Set-Aside is in effect, the trawl CV sector may not engage in directed fishing for cod from the Aleutian Islands Unrestricted Fishery until the earlier of March 15 or until the entire Set-Aside is landed.

This prohibition will be removed if less than 1,000 mt of the Aleutian Islands Catcher Vessel Harvest Set-Aside has not been landed by February 28.

### **Alternative 3:**

1) Prior to March 21, the A season trawl CV Pacific cod harvests in the Bering Sea and trawl CV Pacific cod harvests in the Aleutian Islands except harvests delivered shoreside west of 170° longitude in the AI shall be limited to an amount equal to the BSAI aggregate CV trawl sector A season allocation minus the lesser of the AI directed Pacific cod non CDQ DFA or 5,000 mt.

Upon the closure under the above provision, directed trawl CV fishing for non CDQ BSAI Pacific cod is prohibited for all trawl CVs vessels except trawl CVs delivering shoreside west of 170° longitude in the AI prior to March 21, unless restrictions are removed earlier under 3 or 4 below.

2) Prior to March 15, AI directed Pacific cod non CDQ harvests of any sector other than the CV sector delivering shoreside west of 170° longitude in the AI as defined in 1) are limited to the amount of the AI directed Pacific cod non CDQ DFA above minus the amount set aside from the trawl CV BSAI allocation under 1). Catches of those other sectors under this provision are not subject to the regional delivery requirement.

3) If less than 1,000 mt of the AI Pacific cod non CDQ TAC has been landed shoreside west of 170 longitude in the AI by February 28 the restrictions under 1) and 2) shall be suspended for the remainder of the year.

4) If prior to November 1, neither the City of Adak nor the City of Atka have notified NMFS of the intent to process non CDQ directed AI Pacific cod in the upcoming year, the Aleutian Islands shoreside delivery requirement and restriction on the trawl CV sector allocation is suspended for the upcoming year. Cities can voluntarily provide notice prior to the selected date.

Shoreside deliveries are defined as deliveries made to a facility physically located on land.

# Current Situation (Status Quo - Alternative 1)

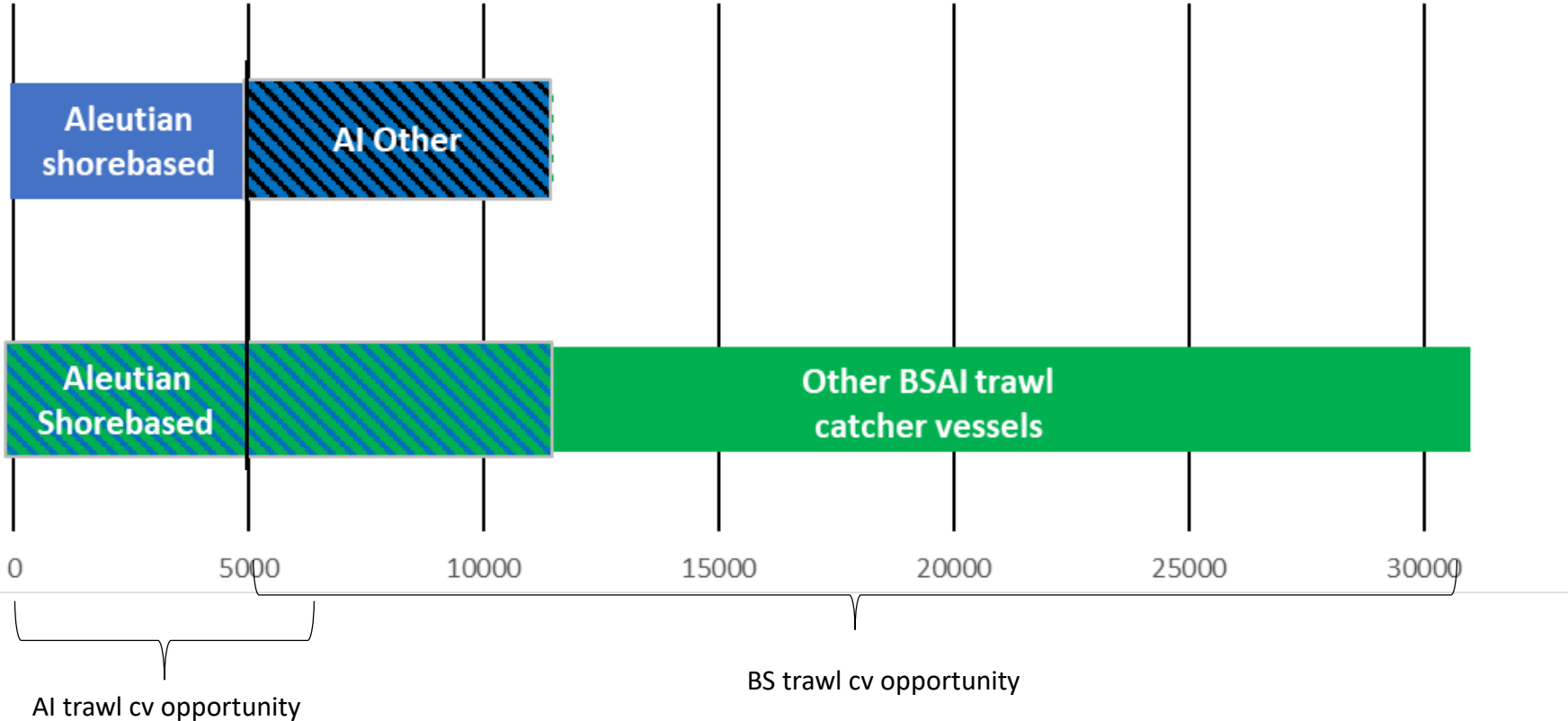
Prior to March 21<sup>st</sup>, BS trawl CVs can take 26,000 mt

Prior to March 15<sup>th</sup>, AI trawl cvs not delivering shoreside west of 170° (together with other Aleutian sectors) can take as much as 7,000 mt

Shoreside west of 170° can get 0 mt to 12,000

Aleutians DFA –  
12,000 mt  
(14,000 AI TAC)

BSAI CV trawl A  
season limit –  
31,000 mt  
(41,333 mt total)



AI trawl cv opportunity

BS trawl cv opportunity

# Alternative 2

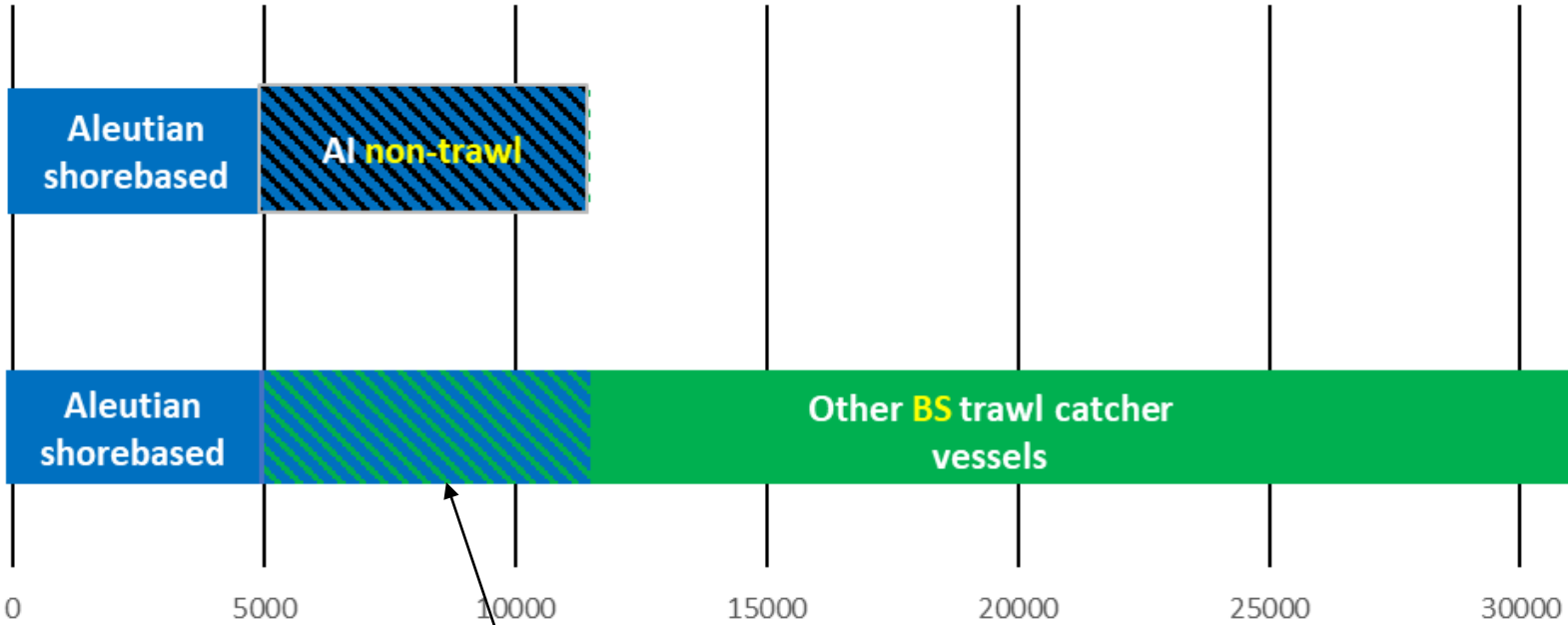
Prior to March 21, BS cv trawl cannot exceed the BSAI cv trawl A season limit minus 5,000 mt

Prior to March 15, AI trawl (except deliveries shoreside west of 170°) is closed until set aside is taken

Prior to March 15, Non-trawl AI catch that is not delivered shoreside west of 170° cannot exceed the AI DFA minus 5,000 mt

Aleutians DFA –  
12,000 mt  
(14,000 AI TAC)

BSAI CV trawl A  
season limit –  
31,000 mt  
(41,333 mt total)



No AI cv trawl catch that is not landed shoreside west of 170° – prevents AI trawl cvs from taking the set aside prior to March 15

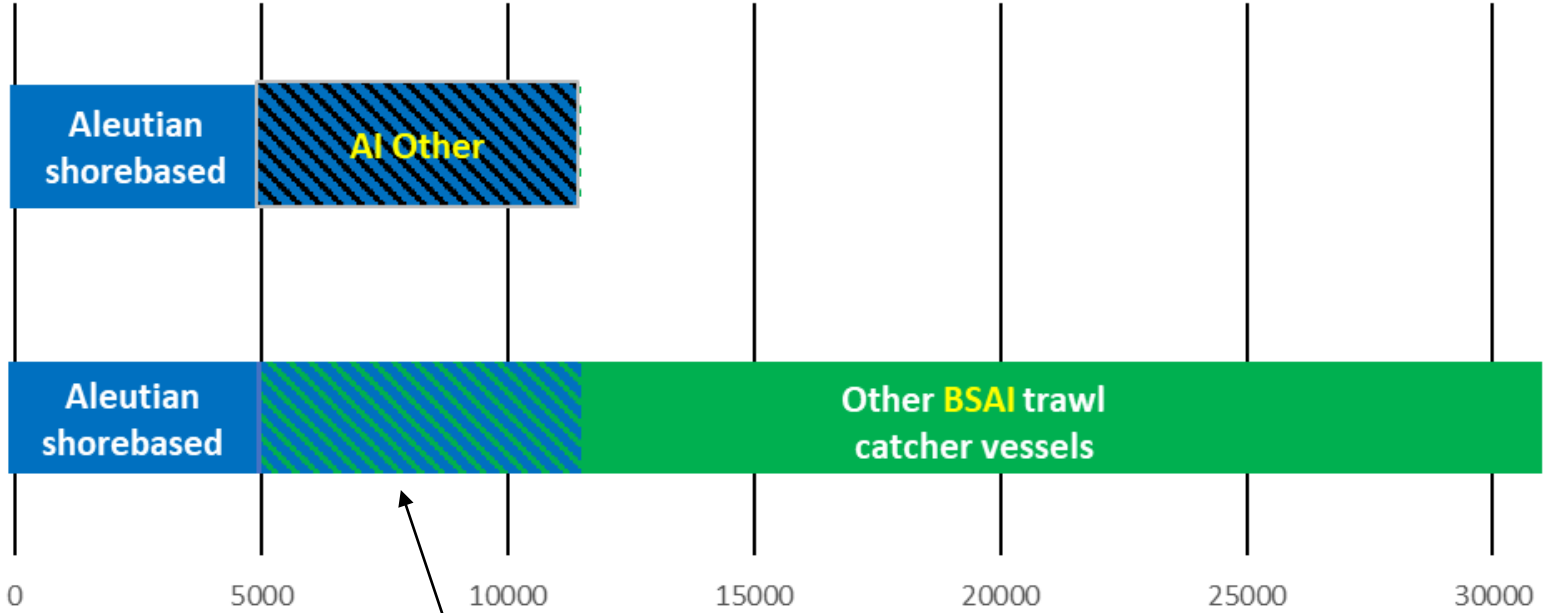
# Alternative 3

Prior to March 21, BS cv trawl and AI cv trawl (except delivering shoreside west of 170°) together cannot exceed the BSAI cv trawl A season limit minus 5,000 mt

Prior to March 15, AI catch that is not delivered shoreside west of 170° cannot exceed the AI DFA minus 5,000 mt

Aleutians DFA –  
12,000 mt  
(14,000 AI TAC)

BSAI CV trawl A  
season limit –  
31,000 mt  
(41,333 mt total)



Includes AI cv trawl catch that is not landed shoreside west of 170° against the BSAI cv trawl limit – prevents AI trawl cvs from taking the set aside prior to March 21



# Alternative 4

Aleutian shore-based Pacific cod set aside with other cv trawl  
Aleutians opportunity

## Purpose

Establish the 5,000 mt set aside for shoreside  
west of 170°

Provide reasonable opportunities to other  
stakeholders

Distinguish three TAC scenarios

Chairman Dan Hull  
NPFMC  
605 West 4<sup>th</sup> Street Ste. 306  
Anchorage AK 99501  
Date: April 1, 2018

Re: Halibut Framework and Abundance-Based Management

Dear Chairman Hull,

On March 6, 2018, Chairman Dan Hull sent a letter to the IPHC on behalf of the Council stating concerns relative to the Commission's 2018 catch limit decisions and the implications of those decisions for the Council's work on Abundance Based Management of halibut PSC caps. Because successful management of the halibut resource depends to a very large degree on clear understanding and communication between the Council and the Commission, stakeholders would like to take this opportunity to address some aspects of that March letter that we believe reflect misunderstanding.

Crucial to that misunderstanding might be the Council's unfamiliarity with the ongoing four year management strategy evaluation process in which the IPHC is engaged. Chairman Hull's letter voiced concern regarding the SPR41% fishing intensity associated with the 2018 catch limit decisions. Perhaps sharing with the Council some additional insight on relative risk and long-term policy implications that have been shared by IPHC staff with IPHC Commissioners and stakeholders will help address these concerns.

#### **Management Strategy Evaluation**

As the Council may be aware, the IPHC has devoted significant resources, including the extensive data the IPHC has collected over a century of successful management, to review the Commission's harvest policy. One of the goals of this review is to identify appropriate harvest rates tailored to the specific life history parameters of halibut. Halibut is one of the few species in the North Pacific that is undergoing a Management Strategy Evaluation to identify appropriate harvest rates.

At the beginning of this harvest policy evaluation, the IPHC staff recommended the Commission switch to an Spawning Potential Ratio (SPR)- based harvest policy. The Commission committed to this approach and staff are now working with stakeholders, scientific advisors, and the Commissioners to identify an SPR for halibut that will be robust over the long-term while balancing trade-offs between maximizing yield, minimizing risk to the stock, providing a measure of stability to the industry, and other objectives identified by those engaged in the process. To date, IPHC staff have conducted simulations using an operating model specific to halibut to determine a preliminary range of appropriate SPR rates for further refinement. Modeling methods and initial results from that evaluation were reviewed by the IPHC's Scientific Review Board and Management Strategy Advisory Board and presented at the January Annual meeting. These results indicate that SPR harvest rates between F40 and F46 perform reasonably similarly and are robust over the long-term. To provide more detail from the simulations:

- The long-term probability of stock levels reaching the IPHC conservation threshold of SB20, which triggers fishery closures, is 2%-3% at all harvest rates within this range.
- The long-term average yield from the stock is between 36 and 40 million pounds within this range, with higher long-term yields resulting from the F40 harvest strategy. The range of potential yield, given variability in the population, is large and may be greater than 100 million pounds in some years.
- The average annual variability within this range is between 6% and 7%, and the probability of a greater than 15% change year to year is 5% at F46 rising to just 6% at F40.
- The probability of reducing the harvest rate because stocks are below the SB30 threshold is between 7% and 19% within this range of SPR values.

Additional work is underway to improve the operating model and further refine the optimum harvest rate range; however, the essential take away is that based on the focused work conducted to date, all harvest rates within a range of F40 to F46 have reasonably similar long-term robustness.

Although the IPHC's harvest policy is designed to be robust over a range of halibut abundance levels, spawning biomass and catch limits will rise and fall based on short and medium-term recruitment and growth events. This is similar to the operation of the Council's harvest policy for groundfish species. We would note that in the Council's letter to the IPHC (first full paragraph on the second page) the risks highlighted are SHORT, rather than long-term risks of reduced abundance, and not part of a long-term SPR harvest policy approach.

However, in addition to modeling the long-term harvest policy considerations, the IPHC is also engaged in modeling a number of short-term effects. Based on recent survey information, halibut stocks will likely decline in the short-term due to below average recruitment. Nevertheless, the probability of realizing the B20 stock conservation threshold within 3 years is less than 1% under all harvest rates between F40 and F46, and the probability of triggering a reduced harvest rate for the directed fishery within 3 years (the B30 threshold) ranges from 10% at F46 to 20% at F40.

Although a final, long-term SPR or harvest policy has not yet been identified, the IPHC considered both short and long-term information during 2018 catch limit deliberations. The IPHC concluded that the SPR41% coastwide harvest rate associated with the 2018 catch limit recommendations was within an acceptable range and that stair-stepping to the SPR46% "hand rail" interim harvest policy over two years was conservative while allowing the 2018 survey information to verify or correct the unexpected results of the 2017 setline survey prior to taking the final stair-step. At the same meeting, the IPHC Commissioners also prioritized the ongoing work to identify a final SPR harvest policy for halibut by committing additional staff resources to the process. Tangentially, we would note that the IPHC is not unique in considering harvest policies that differ from the Council's approach. For example, sablefish, which have some similarity to halibut in terms of life history parameters, are managed by the Council at an F40 rate and by the State of Alaska in Northern Southeast Inside at an F50 rate.

#### **Implications for ABM**

Focusing now on ABM, stakeholders would like to highlight the necessity of solid cooperation for what is in effect a jointly managed species. By way of illustration, we would point out the following:

- In 2017, bycatch accounted for 37% of O26 halibut removals in the BSAI and 53% of O26 halibut removals in Area 4CDE.
- The U26 removals managed by the Council in the BSAI (.91 million pounds) are 50% of coastwide U26 removals. Under an SPR harvest policy, fishing pressure on immature fish affects the available yield to directed fishermen coastwide—from San Francisco to St Paul.
- In sum, the Council managed 44% of the halibut removals in the BSAI and 62% of the halibut removals in Area 4CDE in terms of mortality.

In other words, conservation of the halibut stock depends on both Council and IPHC management. The IPHC can no longer maintain the long-term health of the halibut stock without Council participation in that process. We would remind the Council that the ABM action was catalyzed by low halibut abundance levels in the Bering Sea and the threat of bycatch preempting the directed fishery and potentially exceeding available harvestable biomass in the 4CDE area. To restate, as halibut stocks fluctuate with no change to the PSC limit, both the resource and the directed fishery are vulnerable; bycatch is automatically allocated whether available yield allows that level of harvest or not, and bycatch is allocated as a priority before directed fishery catch limits are established. The Council's problem statement for this action captures this management disconnect: *"The current fixed yield-based halibut PSC caps are inconsistent with management of the directed halibut fisheries and Council management of groundfish fisheries, which are managed based on abundance. When halibut abundance declines, PSC becomes a larger proportion of total halibut removals and thereby further reduces the proportion and amount of halibut available for harvest in directed halibut fisheries."*

This is the source of the problem to which ABM is the solution and, despite the different mandates and policy objectives between the IPHC and the Council, stakeholders agree, as the Council letter states, that "sustaining and conserving the halibut resource is a shared objective." We believe that a properly designed ABM approach will help with this shared management objective by linking a significant source of halibut mortality to an objective, abundance-based index, and providing clear reference points for expected O26 and U26 mortality that the IPHC can then consider in developing a harvest policy and annual catch limits for the directed fisheries under its international mandate. We would note that the ABM process also provides the Council with a reference point for efforts to "balance the harvest and incidental catch of halibut among all [Alaska] user groups" (as noted on P 3 of NPFMC letter). In short, a well-constructed ABM rule will provide clarity and separation between the Council's management of incidental catch and the IPHC's management of the directed fishery.

In closing, we appreciate the Council's commitment to "continue to work on ABM of PSC limits in the BSAI, improvements in the estimation of bycatch mortality, and other issues important to both the IPHC and the Council," and wholeheartedly agree with the Council relative to the "high level of expertise" the current joint staff effort on ABM brings to this project. We appreciate the work group's sustained effort and their patience with helping stakeholders understand the intersection of objectives, indices and control rules. We will continue to do our best to contribute to the ABM effort, as we are working hard

to contribute to development of a new harvest policy carefully tailored to the specifics of the halibut stock through the IPHC process. I hope this letter has helped clarify the rationale behind the IPHC's catch limit decisions this past January and helped the Council understand that those actions did not in any way deviate from the IPHC's over 100-year record of successful, science-based management of the halibut resource.

Thank you for reviewing our comments.

Sincerely,

Linda Behnken, Alaska Longline Fishermen's Association

Phillip Lestenkof, Central Bering Sea Fishermen's Association

Larry Cotter, Aleutian Pribilof Island Community Development Association

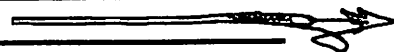
Kathy Hansen, Southeast Alaska Fishermen's Alliance



# KAWERAK, INC.



P.O. BOX 948 • NOME, ALASKA 99762



Telephone: (907) 443-5231 Fax: (907) 443-4452

SERVING THE  
VILLAGES OF:  
  
BREVIG MISSION  
COUNCIL  
DIOMEDE  
ELIM  
GAMBELL  
GOLOVIN  
KING ISLAND  
KOYUK  
MARY'S IGLOO  
NOME  
SAVOONGA  
SHAKTOOLIK  
SHISHMAREF  
SOLOMON  
STEBBINS  
ST. MICHAEL  
TELLER  
LINALAKLEET  
WALES  
WHITE MOUNTAIN

April 2, 2018

To: North Pacific Fishery Management Council  
605 West 4<sup>th</sup>  
Suite 306  
Anchorage, AK 99501  
(delivered in person at the April Council meeting and via [steve.maclean@noaa.gov](mailto:steve.maclean@noaa.gov),  
[diana.evans@noaa.gov](mailto:diana.evans@noaa.gov))

Subject: *Discussion Paper: Review of Council Rural Community Outreach*

Council members,

Thank you for the opportunity to comment on the discussion paper "Review of Council Rural Community Outreach." Kawerak has reviewed this paper and has a variety of comments, below. We hope these are useful as the Council continues work to develop outreach, engagement and collaborations with rural and indigenous communities.

General comments:

It is good that this paper was written to review where Council outreach stands and what has been done. What it really highlights, though, is how sparse Council outreach has been. There are many different concepts discussed in this paper and they need to be separated, distinctly discussed and then combined into a holistic plan for Outreach, engagement and collaborations. We discuss this, with recommendations, further below:

- We believe that outreach should be on-going, as well as project-specific. Developing longer term relationships and understandings through on-going outreach will make project-specific outreach more effective.
- Related to this, allowing and soliciting Tribal and community participation in Council committees is highly valuable. For example, the recent work that the Ecosystem Committee (and staff) has been doing, with the participation of Tribes, Alaska Native organizations, and others is an important step in cultivating long-term relationships built on trust, respect and understanding. Work there is related to the incorporation of Traditional Knowledge, TK holders and social science regarding TK and subsistence into Council processes to ensure that decisions are made with the best available information and that processes are inclusive and equitable.
- It is not entirely clear, from this paper, what the purpose of outreach is, from the perspective of the Council, though it seems to be focused on primarily providing



information to the public (in its various forms). Outreach can also be a vehicle through which to obtain feedback from communities, but in order to do so, it must be planned and structured for that outcome. We recommend that Council outreach activities have two components: sharing information about Council actions, and soliciting and documenting feedback from Tribes and the public about those actions. We would emphasize that outreach activities are not the appropriate place to document Traditional Knowledge (TK), though it is an appropriate place to ask about Traditional Knowledge, talk about collaborations, and determine how Tribes, communities, TK holders and others can work together to ensure their knowledge and concerns become a part of Council processes.

- It would be helpful to have a recognition that there are 'rural' communities which are primarily non-indigenous, and rural communities that are primarily indigenous (and also are the location of a Tribe). This recognition is necessary because Indigenous People and Tribes have special rights, such as Tribal Consultation.
- There needs to be expanded discussion that recognizes that 'outreach' is a completely different activity than the incorporation of TK into NPFMC documents and decisions. Additionally, 'outreach' is a completely different activity than co-production of knowledge work. While there is a sentence in Section 3.1 that acknowledges this, in other sections the distinctions are not as clear.
- 'Co-production of knowledge' is a process, based on equity, that can be used to incorporate/ understand/work with both TK and western science
- The paper would benefit from a discussion of what the Council has learned through its outreach activities and how what has been learned has been utilized by the Council.
- While the NPMFC may not be responsible for the formal Tribal Consultation process, they are responsible for ensuring that information from Consultation is used in their decision-making. This means the Council must have a direct link to Consultation through NOAA/NMFS, and a framework in place that allows them access to Consultation information on a regular and as-needed basis. There needs to be a stronger connection between NMFS Consultation activities and the NPFMC process. NMFS also needs to do a much better job at Consultation activities. For example, Tribes have not been regularly notified of ongoing and new research activities. The Council can emphasize the importance of that work to their activities and request actions from NMFS.
- The Council should emphasize and reaffirm their commitment to working with Tribes and addressing Tribal concerns. There is nothing preventing the Council from doing or saying this. (Just like there is nothing preventing the Council from participating in NMFS Consultation activities, or encouraging NMFS to do more Consultation.)
- We recommend a discussion about the prohibitive cost for many Alaska Native individuals and organizations to participate in Council processes. These costs are one of the reasons why targeted outreach is needed. Actions to level the playing field for rural and indigenous residents who want to be part of the Council process are needed.
- Because the Council does not currently have the capacity to determine when and how to do outreach (e.g. via an outreach specialist), they should rely on a Rural Outreach Committee and others to guide them on Outreach activities. This should include guidance on on-going and action-specific outreach: how to do on-going outreach, which actions may require targeted outreach, who may be affected by or interested in Council actions, what types of outreach are appropriate, and when and where to do targeted outreach.

Section 1:

- The request to the Council by Tribes and Alaska Native organizations was broader than re-visiting outreach activities, but also regarding how the Council actively engages with communities, regional organizations and tribes – beyond outreach and in terms of collaborations, knowledge exchange and in other ways.

Section 2:

- Does the Council still keep a 'running calendar' or regional meetings that may provide outreach opportunities?
- What progress has been made in 'developing regional partnerships' – as was recommended by the ROC?
- Has the Council received yearly reports on Consultation from NMFS? Does the NPFMC think that additional Consultations would be useful?

Section 3:

- A clarification is needed here regarding recent public comments at Council and Ecosystem Committee meetings. Public testimony has certainly called for additional outreach activities to indigenous and rural communities, but it has also asked, directly, for more involvement of indigenous people, organizations, and knowledge to be incorporated into NPMFC processes. These are requests for outreach, collaboration and co-production (but they cannot all be grouped under 'outreach').
- Top of page 5: delete "Native Alaskan" and replace with "Alaska Native"

Section 3.1:

- Page 5: footnote 4 on page 5 is not the correct citation. This is the correct citation: Carolina Behe, Raychelle Daniel and Julie Raymond-Yakoubian. 2018. Understanding the Arctic Through a Co-production of Knowledge. Workshop at the Alaska Marine Science Symposium, Anchorage, AK. January 23-24, 2018.
- Regarding this sentence - "Developing the proper relationships and trust to develop and document traditional knowledge, or a co-production paradigm can take years to decades." It is our understanding that the Council does not directly do research. Additionally, while it is correct that relationships can take a long time to develop, but we suggest presenting this in a positive light. For example, "It can take many years to develop the proper relationships and trust to effectively and equitably work with Traditional Knowledge and Traditional Knowledge holders, particularly with a co-production framework." There is a large volume of Traditional Knowledge that has been documented from communities all over Alaska which is relevant to and available for Council use, and Tribes, communities and organizations that are extremely willing to work with the Council to ensure that such knowledge is appropriately incorporated into Council processes.

Section 3.2:

- We are glad that a Social Science Plan Team has been created. It is not necessarily 'likely' that the SSPT 'will have the expertise to review and advise the Council on integration of traditional knowledge and co-production of knowledge', however. In order to ensure this, the Council must appoint team members that have the experience and knowledge to ensure this happens. The current team has one anthropologist who has worked in Alaska – this is good. We are not familiar with the experience that any of the SSPT members may have with TK or co-production.

There are no TK holders or indigenous people on the SSPT; we recommend that additional people be added and that the SSPT also collaborate with other experts.

Section 4:

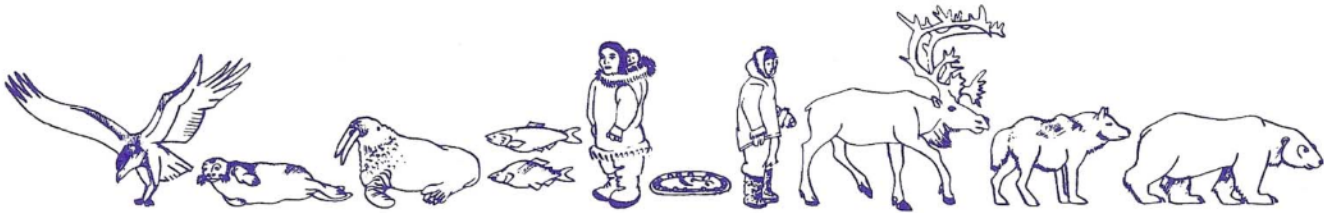
- This section discusses the success of past outreach: "Council's project-specific outreach program has been successful, and improved communication between the Council and rural communities" By what means is the Council measuring success? Just because Council members and staff attended and presented information at more events doesn't necessarily mean that rural communities have a greater understanding of the Council and what they do, or that they have increased opportunities to provide feedback. They might - but how was this impact evaluated for this paper? We encourage the Council to develop tools to measure the success of their outreach, engagement, collaborations and other community-centered work.
- We agree that the ROC should be re-convened (and new membership solicited) so that it can continue to provide outreach guidance on an on-going and action-specific basis. We recommend the Council and ROC also seek the guidance of others with expertise in this area, including Alaska Native Organizations. We also recommend that the Council develop in-house expertise in outreach. We recommend that a reconstituted Committee have a broader scope and also take up topics such as engagement, consultation, collaborations, partnerships, etc.
- There have been long periods of time where it appears that the Council has not done much outreach while, at the same time, there were Council activities ongoing that could have been the focus of outreach activities.
- We hope that the BSFEP team and the SSPT will collaborate. We would like more details regarding how this collaboration will take place. We recommend that TK holders, Alaska Native organizations, and social scientists from outside the Team be actively recruited to participate in any collaborations.

Thank you for considering our comments and recommendations regarding this discussion paper and outreach activities. If you have questions or would like to further discuss this, please contact me at 907-443-4273 or [juliery@kawerak.org](mailto:juliery@kawerak.org), or Rose Fosdick at 443-4377 or [rfosdick@kawerak.org](mailto:rfosdick@kawerak.org).

Sincerely,



Julie Raymond-Yakoubian  
Social Science Program Director  
KAWERAK INC



**KAWERAK, INC.**



P.O. BOX 948 • NOME, ALASKA 99762



Telephone: (907) 443-5231 Fax: (907) 443-4452

SERVING THE  
VILLAGES OF:

BREVIK MISSION

COUNCIL

DIOMEDE

ELIM

GAMBELL

GOLOVIN

KING ISLAND

KOYUK

MARY'S IGLOO

NOME

SAVOONGA

SHAKTOOLIK

SHISHMAREF

SOLOMON

STEBBINS

ST. MICHAEL

TELLER

UNALAKLEET

WALES

WHITE MOUNTAIN

April 2, 2018

To: North Pacific Fishery Management Council  
605 West 4<sup>th</sup>  
Suite 306  
Anchorage, AK 99501  
(delivered in person at the April Council meeting and via [steve.maclean@noaa.gov](mailto:steve.maclean@noaa.gov),  
[diana.evans@noaa.gov](mailto:diana.evans@noaa.gov))

Subject: *Discussion Paper: Review of Council Rural Community Outreach*

Council members,

Thank you for the opportunity to comment on the discussion paper "Review of Council Rural Community Outreach." Kawerak has reviewed this paper and has a variety of comments, below. We hope these are useful as the Council continues work to develop outreach, engagement and collaborations with rural and indigenous communities.

General comments:

It is good that this paper was written to review where Council outreach stands and what has been done. What it really highlights, though, is how sparse Council outreach has been. There are many different concepts discussed in this paper and they need to be separated, distinctly discussed and then combined into a holistic plan for Outreach, engagement and collaborations. We discuss this, with recommendations, further below:

information to the public (in its various forms). Outreach can also be a vehicle through which to obtain feedback from communities, but in order to do so, it must be planned and structured for that outcome. We recommend that Council outreach activities have two components: sharing information about Council actions, and soliciting and documenting feedback from Tribes and the public about those actions. We would emphasize that outreach activities are not the appropriate place to document Traditional Knowledge (TK), though it is an appropriate place to ask about Traditional Knowledge, talk about collaborations, and determine how Tribes, communities, TK holders and others can work together to ensure their knowledge and concerns become a part of Council processes.

- It would be helpful to have a recognition that there are ‘rural’ communities which are primarily non-indigenous, and rural communities that are primarily indigenous (and also are the location of a Tribe). This recognition is necessary because Indigenous People and Tribes have special rights, such as Tribal Consultation.
- There needs to be expanded discussion that recognizes that ‘outreach’ is a completely different activity than the incorporation of TK into NPFMC documents and decisions. Additionally, ‘outreach’ is a completely different activity than co-production of knowledge work. While there is a sentence in Section 3.1 that acknowledges this, in other sections the distinctions are not as clear.
- ‘Co-production of knowledge’ is a process, based on equity, that can be used to incorporate/ understand/work with both TK and western science
- The paper would benefit from a discussion of what the Council has learned through its outreach activities and how what has been learned has been utilized by the Council.
- While the NPMFC may not be responsible for the formal Tribal Consultation process, they are responsible for ensuring that information from Consultation is used in their decision-making. This means the Council must have a direct link to Consultation through NOAA/NMFS, and a framework in place that allows them access to Consultation information on a regular and as-needed basis. There needs to be a stronger connection between NMFS Consultation activities and the NPFMC process. NMFS also needs to do a much better job at Consultation activities. For example, Tribes have not been regularly notified of ongoing and new research activities. The Council can emphasize the importance of that work to their activities and request actions from NMFS.
- The Council should emphasize and reaffirm their commitment to working with Tribes and addressing Tribal concerns. There is nothing preventing the Council from doing or saying this. (Just like there is nothing preventing the Council from participating in NMFS Consultation activities, or encouraging NMFS to do more Consultation.)

## Section 1:

- The request to the Council by Tribes and Alaska Native organizations was broader than re-visiting outreach activities, but also regarding how the Council actively engages with communities, regional organizations and tribes – beyond outreach and in terms of collaborations, knowledge exchange and in other ways.

## Section 2:

- Does the Council still keep a ‘running calendar’ or regional meetings that may provide outreach opportunities?
- What progress has been made in ‘developing regional partnerships’ – as was recommended by the ROC?
- Has the Council received yearly reports on Consultation from NMFS? Does the NPFMC think that additional Consultations would be useful?

## Section 3:

- A clarification is needed here regarding recent public comments at Council and Ecosystem Committee meetings. Public testimony has certainly called for additional outreach activities to indigenous and rural communities, but it has also asked, directly, for more involvement of indigenous people, organizations, and knowledge to be incorporated into NPMFC processes. These are requests for outreach, collaboration and co-production (but they cannot all be grouped under ‘outreach’).
- Top of page 5: delete “Native Alaskan” and replace with “Alaska Native”

## Section 3.1:

- Page 5: footnote 4 on page 5 is not the correct citation. This is the correct citation: Carolina Behe, Raychelle Daniel and Julie Raymond-Yakoubian. 2018. Understanding the Arctic Through a Co-production of Knowledge. Workshop at the Alaska Marine Science Symposium, Anchorage, AK. January 23-24, 2018.
- Regarding this sentence - “Developing the proper relationships and trust to develop and document traditional knowledge, or a co-production paradigm can take years to decades.” It is our understanding that the Council does not directly do research. Additionally, while it is correct that relationships can take a long time to develop, but we suggest presenting this in a positive light. For example, “It can take many years to develop the proper relationships and trust to effectively and equitably work with Traditional Knowledge and Traditional Knowledge holders, particularly with a co-production framework.” There is a large volume of Traditional Knowledge



There are no TK holders or indigenous people on the SSPT; we recommend that additional people be added and that the SSPT also collaborate with other experts.

Section 4:

- This section discusses the success of past outreach: “Council’s project-specific outreach program has been successful, and improved communication between the Council and rural communities” By what means is the Council measuring success? Just because Council members and staff attended and presented information at more events doesn’t necessarily mean that rural communities have a greater understanding of the Council and what they do, or that they have increased opportunities to provide feedback. They might - but how was this impact evaluated for this paper? We encourage the Council to develop tools to measure the success of their outreach, engagement, collaborations and other community-centered work.
- We agree that the ROC should be re-convened (and new membership solicited) so that it can continue to provide outreach guidance on an on-going and action-specific basis. We recommend the Council and ROC also seek the guidance of others with expertise in this area, including Alaska Native Organizations. We also recommend that the Council develop in-house expertise in outreach. We recommend that a reconstituted Committee have a broader scope and also take up topics such as engagement, consultation, collaborations, partnerships, etc.
- There have been long periods of time where it appears that the Council has not done much outreach while, at the same time, there were Council activities ongoing that could have been the focus of outreach activities.
- We hope that the BSFEP team and the SSPT will collaborate. We would like more details regarding how this collaboration will take place. We recommend that TK holders, Alaska Native organizations, and social scientists from outside the Team be actively recruited to participate in any collaborations.

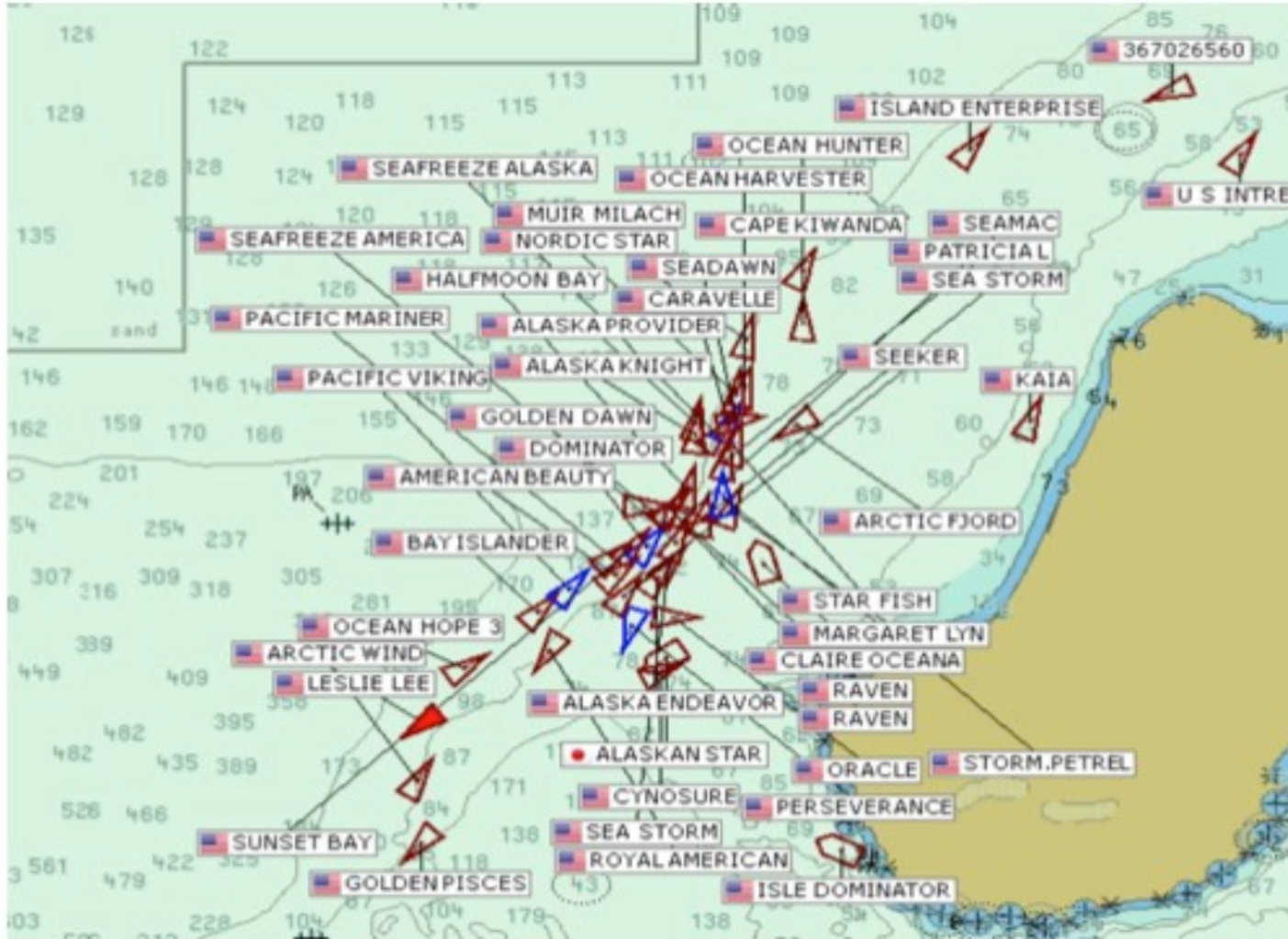
Thank you for considering our comments and recommendations regarding this discussion paper and outreach activities. If you have questions or would like to further discuss this, please contact me at 907-443-4273 or [juliery@kawerak.org](mailto:juliery@kawerak.org), or Rose Fosdick at 443-4377 or [rfosdick@kawerak.org](mailto:rfosdick@kawerak.org).

Sincerely,

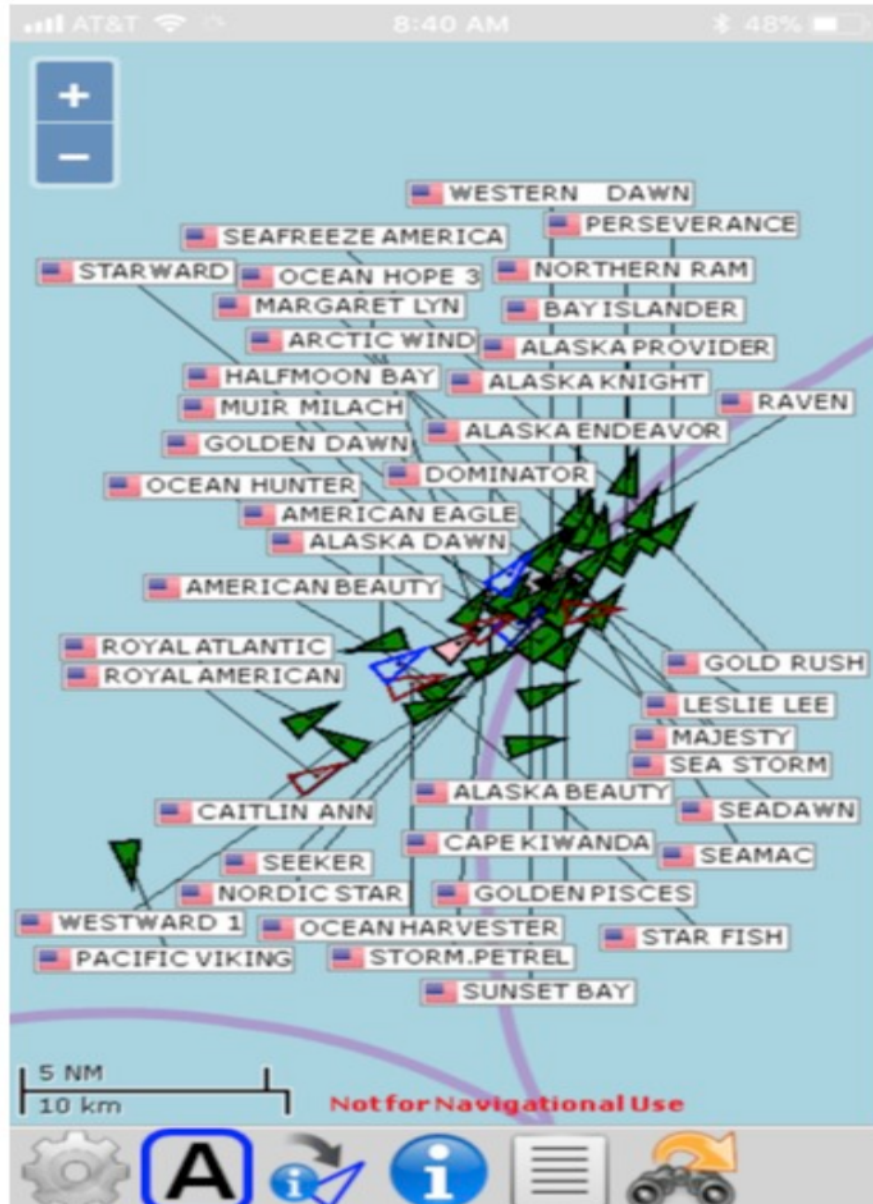


# 2018 EBS P. Cod CV Trawl Vessel AIS Location –Unimak Pass Area

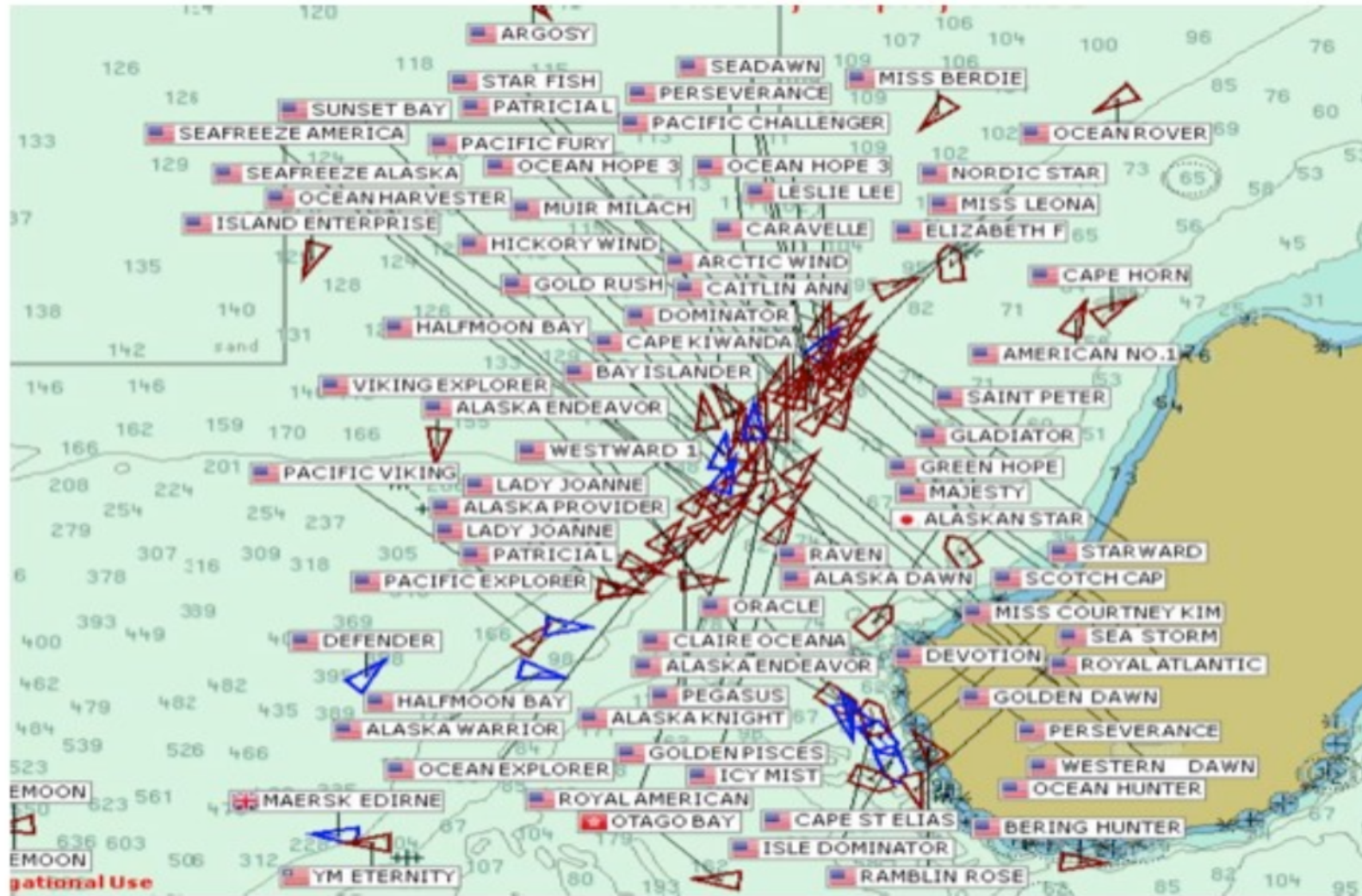
Source: Marine Exchange of Alaska



February 20, 2018











# April 1 2018 (Start of R Season)



