



June 1st, 2023
North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
L92 Building, 4th Floor
Anchorage, Alaska 99501

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members,

The Aleut Community of St. Paul Island (ACSPI), a federally recognized Alaska Native Tribe located on the Pribilof Islands, Alaska, is pleased for the opportunity to submit our comment to the LKTKS Protocol and Onramp documents prepared by the NPFMC's LKTKS Taskforce. We commend the LKTKS Taskforce and council staff for the work to realize the protocol and onramp recommendations. We applaud the protocol as a groundbreaking document that provides information and best practices to incorporate LKTKS information into the Council's decision-making. **We advocate that the NPFMC fully adopt the LKTKS Protocol document and to fully implement the recommendations in the Onramp document as they are now, with no substantive changes.**

As a Tribal Government with Tribal members that are knowledge holders, hunters, and fishermen we strive to incorporate LKTKS in all our projects and programs. To see that are pathways that LKTKS can be inform the NPFMC decision making process is encouraging for the representation of Tribal entities, and communities in regulations that have significant impacts to our livelihoods. It is encouraging that these recommendations can address greater representation of knowledge of Tribal entities and communities in the NPFMC decision making process that have significant impacts to our livelihoods. We look forward that the adoption of this document will set a precedent of advancing LKTKS knowledge systems from a diversity of communities and regions within the Council purview.

Sincerely,

A handwritten signature in blue ink that reads "Amos T. Philemonoff, Sr.".

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



Alaska Longline

FISHERMEN'S ASSOCIATION

Post Office Box 1229 / Sitka, Alaska 99835 / 907.747.3400 / alfastaff@gmail.com

May 27, 2023

Dear Chairman Kinneen,

On behalf of the Alaska Longline Fishermen's Association (ALFA), I am writing to support the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the Council's LKTKS Taskforce.

While we understand the Protocol is not on the June agenda, we wanted to take this opportunity to voice our support and ask that the Council be prepared to adopt the Protocol in October and identify a strategy for implementation of the Onramp recommendations. We recognize the Council may choose to implement only some of the onramps initially, but we believe that strategically planning to implement them all will improve the Council process for Tribes, stakeholders, and the public generally.

The Protocol provides a framework covering the appropriate and necessary scope related to the incorporation of LKTK. This includes a discussion and definition of terms and concepts, which provides a useful basis for understanding, respecting, appreciating, and engaging with various knowledges and knowledge systems. The eight Guidelines included in the Protocol provide guidance and associated recommendations to the Council for how to equitably incorporate multiple knowledge systems into its processes and outcomes. If adopted and implemented, the LKTKS Protocol and Onramp recommendations will improve Council analyses and decision-making by providing a more equitable, inclusive, and robust process. In short, the Taskforce has produced impressive work of national significance.

In closing, ALFA commends the work of the Taskforce, and we thank the Council for prioritizing this Action Module of the Bering Sea Fishery Ecosystem Plan. We believe the LKTKS Protocol and Onramp recommendations document is excellent, and we strongly recommend the Taskforce and Council move forward towards full adoption and implementation without substantive changes.

Thank you for the opportunity to comment.

Linda Behnken
(Executive Director, ALFA)



June 2, 2023

Mr. Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 West Third, Suite 400
Anchorage, AK 99501-2252

Mr. John Kurland, Regional Administrator .
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

RE: Request for Comments for LKTKS Protocol and Onramp Recommendations

Dear Chair Kinneen and Members of the Council,

The Alaska Marine Conservation Council (AMCC) is dedicated to protecting the long-term health of Alaska's marine ecosystems which sustain vibrant fishery-dependent communities. Our members include fishermen, subsistence harvesters, marine scientists, small business owners and diverse fishing families. Our ways of life, livelihoods and local economies depend on the sustainable fishing practices that contribute to healthy ecosystems.

AMCC welcomes this opportunity to comment on, and voice our support for, the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents developed by the LKTKS Taskforce. AMCC appreciates the dedicated time and commitment by the members of the Taskforce in the development of guidelines and recommendations for protocols to include LKTKS in the Council's decision-making process. The expertise of the Taskforce members, the dedication of staff supporting the Taskforce, the amount of time and thoughtfulness committed to developing an interconnected suite of recommendations contributed to the meaningful document we have before us.

The LKTKS Protocol and Onramp recommendations have been developed through an extensive iterative process and the document reflects the commitment to meeting the identified task. In the development of the Bering Sea Fishery Ecosystem Plan, an identified gap of information was the use of LKTKS to inform decision makers. As a result, the action module devoted to development of protocols to augment this need has advanced in a way that will benefit the existing process. We appreciate the Council's support in the advancement of this important work throughout the process.

The taskforce recommendations bridge the gap and provide guidance to move LKTKS forward in the Council process. The process outlined provides the opportunity for the LKTKS Taskforce to meet again and review the comments that come to the Council during the comment period. This approach will provide opportunity to address and/or incorporate public comments into the finalized documents which can then be presented to the Council at the October 2023 meeting.

The October meeting will provide the space for what we view as a monumental occasion, to fully support and adopt the protocols and develop a strategy for implementation. The adoption of the protocols will serve as an avenue to improve the Council process and supports the Council's ecosystem goals. The protocols will support guidance in National Standard 2 as they relate to TK, Indigenous science and approaching management systems in a more inclusive and holistic way, cornerstone components of EBFM. The LKTKS documents the Council has before them now represent the outcomes of a multi-year process and are complete in their current form. We encourage the Council to refrain from substantive changes to the document as the product before you is wide-ranging, comprehensive and forward thinking.

Sincerely,

A handwritten signature in cursive script that reads "Theresa Peterson".

Theresa Peterson
Fisheries Policy Director
Alaska Marine Conservation Council



June 2, 2023

North Pacific Fishery Management Council
Simon Kinneen, Chair
1007 West 3rd Ave., Suite 400
Anchorage, AK 99501

RE: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Chairman Kinneen and members of the Council,

The At-sea Processors Association (APA) broadly supports the Council's adoption of the LKTKS Protocol and Guidelines as the conclusive work product of the Council's Local Knowledge, Traditional Knowledge, and Subsistence Taskforce.

APA comments below are specific to aspects of *Local Knowledge* only, and are not intended to address issues related to Traditional and Subsistence Knowledge.

APA member skippers and crew have many decades of experience of fishing in the Bering Sea, and have direct knowledge about the marine ecosystem and the ongoing effects of climate change. We believe that they are local knowledge holders that make up a *community* of Bering Sea fishery stakeholders with valuable knowledge and perspectives to contribute to the Council's fishery management process. Our organization has pioneered efforts to collect fleet level local knowledge and perspectives that should be considered within the Council's decision-making process (see for example: [Capturing stakeholder perspectives through a collaboration with a commercial fishing cooperative](#); Murphy et al. 2020).

While Council staff routinely reach out to APA staff to gather perspectives related to fishing behaviors and economic impacts to the fleet given a particular action alternative, we support the expanded inclusion of local knowledge holder perceptions. Specifically, social science research cultivation would benefit Council decision making processes by having the firsthand perspectives of those fishermen whose livelihoods are directly impacted. Often public testimony falls short of this objective. We have found through internal local knowledge collection efforts that perspectives within our own fleet are diverse and not always well represented by a single voice.

We recognize that current capacity for such local knowledge collection is limited, and the analytical timelines for producing Council documents are also extremely limited. Under Guideline 1 it was suggested: "One practical example could be extending the time between initial review and final action or between the adoption of alternatives and initial review." However, we caution that further slowing the process, particularly in the context of rapid climate change, will have to be balanced with the needs of stakeholders seeking expeditious action.



APA broadly supports most of the LKTKS Onramp recommendations. However, the Council should explicitly provide guidance as to when, where and how LKTKS knowledge should be collected and prioritize staff time relative to presenting robust analyses that meet the requirements of NEPA and the Magnuson-Stevens Act.

Specific to the Onramp recommendations for LKTKS in the Council process:

- APA supports the ongoing use of the LKTKS taskforce search engine and the dedicated staff time needed to maintain its ongoing viability.
- We support presentations and reports to the Council with Tribal co-management partners on co-management activities under the B-reports on issues directly relevant to Council management issues.
- APA supports expanded social science expertise on the SSC, however, this should only be done in conjunction with an increase in LKTKS information being brought forward.
- We do not support a completely open-ended request for research priorities via a workshop, as it would serve to further complicate the process of prioritizing the Council's key research priorities. We feel the SSC is best positioned to recommend and select core research priorities for the Council.
- We support the Council's efforts to increase capacity in the social science fields, and LKTKS expertise.
- We support the use of the LKTKS template. It should be modified to require that Council staff first determine whether Local Knowledge, Traditional Knowledge, or Subsistence information (or any combination) would apply to any given action based on an objective criterion. The LKTKS template and protocol remains silent on how the Council and analysts should balance differing or competing perspectives associated with production of LKTK knowledge. We believe the LKTKS template should include a discussion of any potential disagreements, or alternative interpretations of LK/TK information prior to inclusion, such that important considerations about when LK/TK can be addressed.

Finally, we would like to commend the work of the LKTKS Taskforce and the impressive body of work that Council staff has compiled. Thank you for the opportunity to comment.

Sincerely,



Stephanie Madsen
Executive Director

May 28, 2023
Austin Ahmasuk
PO BOX 693
Nome, AK. 99762

Kate Haapala

North Pacific Fishery Management Council 1007 W. 3rd Ave, Suite 400
Anchorage, AK 99501

RE: Protocol for Identifying, Analyzing, and Incorporating Local Knowledge, Traditional Knowledge, and Subsistence Information into the North Pacific Fishery Management Council's Decision-making Process, March 17, 2023

To Whom It May Concern

My name is Austin Ahmasuk I am a pularak and kingik inupiaq I was born and raised in Nome. I am now a resident of Nome and Palmer. I lived continuously in Nome until Typhoon Merbok destroyed my home in September 2022.

I thank the LK/TK Taskforce for the work it completed and encourage its serious consideration. The NPFMC has successfully taken positive steps to implement a vision for the future of sustainable and equitable management of the Bering Sea's fisheries through Action Module 2 of the BSFEP. The module includes innovative measures that recognize subsistence fishing as the foundation of traditional knowledge and if promoted effectively will address longstanding equity and environmental Justice considerations amongst subsistence users in the Bering Sea. **The NPMFC has been at the helm of several biological disasters and must accept some responsibility for the recent biological crashes that have been experienced in the Bering Sea. The NPMFC has not acted fast enough to address climate change. However, by focusing on resource conservation, Indigenous rights, and equity and environmental justice the NPFMC has demonstrated a commitment to a stewardship model for managing fisheries in the Bering Sea that can be applauded**

Through the work of the LK/TK Task Force, the NPFMC is considering a positive milestone in protecting the highly valuable resources of the Bering Sea that indigenous people depend on. The Council's approach to tackling this challenge is worthy of praise as it strengthens cooperation between the Council and indigenous communities while addressing improved management to ecological health. **Ultimately, this effort paves the way for a brighter future where communities are empowered. By implementing Lk/TK Protocol the Council is addressing equity and environmental justice for a sustainable management that presently does not exist.** Subsistence users have pleaded for the protection of their natural resources, and engagement with the Council for mutual benefit. As we practice our traditional lifeways that have been passed down from generations before we are gravely concerned that without

the LK/TK protocol the Council will be less able to manage the Bering Sea's resources for future generations.

In ocean and coastal management, indigenous people have a right to maintain their cultural and spiritual connections to the environment, as well as their sociocultural and economic contributions from our ancestral and sustainable use of traditional marine resources. Therefore, the LK/TK goals are important for indigenous people and the Council in order to ensure that voices are heard and taken into account when it comes to management decisions to ensure equity and environmental justice.

By creating a process that identifies, analyzes, and incorporates LK/TK, the Council ensures that our subsistence uses of living resources is protected. Incorporating LK/TK into the Council's decision-making process provides a more holistic approach to managing maritime areas by taking into account both the physical environment as well as cultural values of its inhabitants. Furthermore, this allows for greater engagement between the Council and local communities regarding issues of sustainability and resource management in a way that respects traditional customs and beliefs while also providing an opportunity for mutually beneficial outcomes.

Subsistence activities provide not only physical material such as food, but also spiritual and cultural benefits for indigenous peoples so it is crucial that they be taken into account during decision-making processes. Having an LK/TK protocol in which traditional knowledge information is included in the analysis can help protect traditional practices from exploitation while simultaneously ensuring sustainable usage of resources necessary for subsistence activities will remain available for future generations to enjoy. Incorporating data about Indigenous people's worldviews can broaden our understanding about how subsistence activities create meaningful connections between human society and the Bering Sea; something which scientific evidence may overlook or fail to capture accurately within a complex system such as northern Bering Sea management. When the NPFMC seeks best scientific information available through EBFM and includes traditional knowledge it is seeking equity and environmental justice. By ensuring traditional knowledge inclusion in EBFM principles the Council is including different backgrounds including both Indigenous people interests and non-Indigenous interests. As the Bering Sea experiences the global effects of global warming from militarization, increased shipping, massive energy consumption, it is imperative to reduce negative impacts on marine ecosystem health.

Infrastructure projects like the port of Nome expansion Port of Nome Modifications have destroyed Alaska Native people, place and history. Alaska Native's lands were wrongly taken from us in the early 1900's and mineral surveys were established that changed the nature of our ancestral occupation without our consent and were ceded to non-Native interests without due consideration of aboriginal use and occupancy. Port of Nome modifications from the 1990's until the recent period resulted in Alaska Native and non-Native people being evicted from their homes within the port zone at the former sandspit site and near the snake river for laydown zones. The historic archeological sandspit site at Nome was intentionally destroyed and its archeological context was also destroyed and taken by the city of Nome. The wrongful taking of

archeological materials by the city of Nome is representative of the racist and colonialist forces that are impacting the Alaska Native people of Nome today. City of Nome port advocates have advocated three falsehoods. 1. that an arctic port is needed for national security; 2. an arctic port is needed for oil spill response capability as shipping increases; 3. a larger expanded port will reduce the cost of living. The Council is taking an important step that is sorely needed to address equity and environmental justice in Bering Sea communities. **Unlike the city of Nome and US Army Corps of Engineers that are keen to destroy Alaska Native people, place, and history and are not interested LK/TK protocols, the Council will be setting a sorely needed precedent across government that the city of Nome and US Army Corps of Engineers can learn from. Our indigenous way of life has been impacted by many years of bad government policies which has resulted in our harm and harm to the ecosystem. By implementing LK/TK protocols government can begin reversing many years of that destruction.**

My hometown of Nome relies heavily on subsistence activities, such as hunting, fishing, and gathering, to provide us with rich foods and a way of life. We emphasize the importance of incorporating local knowledge and traditional knowledge into decision-making processes that affect our lands and waters. Too often that hasn't happened with past Council decisions. Engagement with stakeholders from an equity and environmental justice lens is essential for understanding the context in which decisions are made. By listening to local perspectives, it is possible to make decisions that better suit the needs of the community and the resource. Comprehensive research that takes into account both scientific studies and traditional knowledge is essential for creating policies that protect natural resources while still allowing access to them for subsistence purposes among rural populations living on the Bering Sea

The LK/TK protocol seeks to recognize and support the integral role of Indigenous people in stewardship of the Bering Sea, emphasizing the importance of traditional knowledge, local knowledge, and subsistence access. It provides a platform for greater engagement between Indigenous people and government bodies to ensure that sustainable fishing practices are implemented and equity and environmental justice is considered. The LK/TK Taskforce worked with Indigenous communities to develop meaningful dialogue and action on issues such as resource management, marine conservation, and food security. The LK/TK Taskforce was knowledgeable of the nature of collaboration between multiple parties that is required to identify potential solutions. By having training for fishers, managers, and other stakeholders on topics pertinent to effective conservation strategies, staff have become aware of the racist and colonialist impact of the State of Alaska and Federal Government. **Addressing racism and colonialism and incorporating LT/TK is an important step because entire populations of Alaska Native people have NOT had an effective voice in politics, education, the judicial system, and at times the Council. The NPMFC, NMFS cannot be the best managers of Bering Sea resources without everyone's voice especially indigenous people whose LK/TK spans millennia.** This protocol seeks to recognize LK/TK alongside sustainable practices in order to ensure long-term protection of vital resources in the Bering Sea for generations to come.

We have argued at many NPFMC meetings over the years that the NPFMC has failed to collect adequate data that would provide the best scientific information available, as required by

National Standard 2 of the Magnuson-Stevens Act. Despite years of comments from stakeholders in the Bering Sea for increased focus on environmental concerns and conservation measures, the NPFMC has largely neglected such considerations during decision-making processes. This implies that they have not taken proper steps towards developing informed regulations based on sound scientific practices. For decades indigenous people have argued the NPFMC has failed to properly consider social science methods when evaluating management options, and decisions have been out of touch with reality on the ground. This is especially true in regards to subsistence fishing which requires different management strategies than commercial interests. There have been numerous instances where public input was ignored or disregarded by the Council despite clear evidence on how their decision would impact affected communities. This failure to engage with local stakeholders means Council decisions were unrepresentative of regional needs and preferences when it comes to fisheries management practices and policies. **The Council is now at the point where it can develop meaningful relationships with LK/TK and subsistence users in order to ensure equity and environment justice.**

By meeting with local and traditional experts and engaging in dialogue that is respectful and mutually beneficial the Council can ensure equity and environmental justice. However, without the necessary support and resources, the goals may not be achieved for those involved in LK/TK. The Council should ensure adequate funding to help provide subsistence users with the tools they need to succeed.

It is essential for the Council to recognize the significant role of LK/TK and LT/TK holders when making decisions, as their contributions are invaluable to successful outcomes. We acknowledge our subsistence lifestyle as vitally important. The Council is demonstrating a significant commitment to providing tangible support to those who rely on the Bering Sea for their subsistence way of life. Furthermore, engagement with LK/TK stakeholders in meaningful dialogue respects our autonomy while promoting sustainability.

I encourage the NPFMC to implement the March 17, 2023 LK/TK protocol and associated on-ramps as they are currently written.

Thank you for time and consideration

Austin Ahmasuk

ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS

Thaddeus Tikiun Jr., Chairperson | Vivian Korthuis, CEO | AVCP.org



Administration

101 A Main St., PO Box 219, Bethel, AK 99559 | T 907.543.7300 | F 907.543.3596

June 2, 2023

Simon Kinneen (NPFMC Chair) and David Witherall (NPFMC Executive Director)
Dr. Kate Haapala and Dr. Sarah Wise (NPFMC LKTKS Taskforce Co-Chairs)
1007 W. Third Avenue, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501

Submitted electronically through the Council's eAgenda website

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Chair Kinneen, Director Witherell, Dr. Haapala, Dr. Wise, LKTKS Taskforce members, and Council members:

The Association of Village Council Presidents (AVCP) strongly recommends the adoption of the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and the expedient implementation of the related Onramp Recommendations.

AVCP is the regional, non-profit tribal consortium of the Yukon-Kuskokwim Delta, with 56 federally recognized tribes as members. AVCP provides essential social services and advocacy for the Tribes and tribal members of the YK-Delta. One of our top advocacy priorities is ensuring equitable tribal representation and inclusion of Traditional and Indigenous Knowledge in all fisheries, subsistence, and land management policies and decision-making.

Adoption and full implementation of the LKTKS Protocol and Onramp Recommendations will bring the Agency a step closer to honoring the special government-to-government relationship and fulfilling the trust responsibility between the Federal Government and Tribes. It will also provide many benefits, such as improving the Council process for Tribes, stakeholders, and the general public; supporting the implementation of the Council's Ecosystem Policy; and significantly advancing Council and Agency goals related to meeting various National Standard mandates, including National Standard 2 with regard to the use of the best scientific information available.

Nunaput umyuallgutkut pinirluteng-llu, Tegganerput qigcikliki pirpakluki-llu, ayagyuaput-llu ciuliqagcimaut yuuyarakun.
Our Tribes are united and strong, our Elders are respected and valued, and our youth are guided by Yuuyaraq.

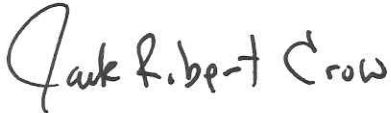
Akiachak, Akiak, Alakanuk, Andreafski, Aniak, Atmaulluak, Bethel, Bill Moore's Sl., Chefornak, Chevak, Chuathbaluk, Chuloonawick, Crooked Creek, Eek, Emmonak, Georgetown, Goodnews Bay, Hamilton, Hooper Bay, Lower Kalskag, Upper Kalskag, Kasigluk, Kipnuk, Kongiganak, Kotlik, Kwethluk, Kwigillingok, Lime Village, Marshall, Mekoryuk, Mtn. Village, Napaimute, Napakiak, Napaskiak, Newtok, Nightmute, Nunakauyak, Nunam Iqua, Nunapitchuk, Ohogamiut, Oscarville, Paimiut, Pilot Station, Pitka's Point, Platinum, Quinhagak, Red Devil, Russian Mission, Scammon Bay, Sleetmute, St. Mary's, Stony River, Tuluksak, Tuntutuliak, Tununak, Umkumiut

At a time when our fisheries are in crisis, and the subsistence Way of Life practiced by our people since time immemorial is in jeopardy, it is imperative that we use all available resources to identify solutions to this disaster – including Traditional and Indigenous Knowledge. For these reasons, AVCP fully supports the adoption and implementation of the Protocol for Identifying, Analyzing, and Incorporating Local Knowledge, Traditional Knowledge and Subsistence Information into the North Pacific Fishery Management Council Decision-making Process and the associated Onramp Recommendations, as presented by the LKTKS Taskforce.

Thank you for your attention to these comments and thank you to the LKTKS Taskforce for the countless hours spent developing these excellent products.

Sincerely,

THE ASSOCIATION OF VILLAGE COUNCIL PRESIDENTS



for Vivian Korhuis
Chief Executive Officer



Bruce W. McKay
Shareholder, Bering Straits and Unalakleet Native Corporations
05/26/2023 01:02 PM AKDT

RE: Please leave all comments on the Protocol and onramp recommendations here.

I support NPFMC to adopt the full LTKS Protocol. The indigenous groups must be recognized on equal footing with other stakeholders. Respectfully, Bruce W. McKay Associate in Science for Fisheries and Marine Technology, University of Rhode island, 1978 (Magnuson-Stevens Act era) Former crew, Bering Sea crab and ground fish fisheries. Deck Officer, U.S. Merchant Marine



Bering Sea Elders Group

Date: May 30, 2023

From: Jaylene Wheeler, Executive Director
Bering Sea Elders Group
911 W. 8th Avenue, Suite 100, PBM102
Anchorage, Alaska 99501

To: Simon Kinneen, NPFMC Chair
David Witherall, NPFMC Executive Director
Dr. Haapala and Dr. Wise, NPFMC LKTKS Taskforce Co-Chairs

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members:

My name is Jaylene Wheeler and I serve as Executive Director for the Bering Sea Elders Group (BSEG). I appreciate the opportunity to comment regarding the Local Knowledge, Traditional Knowledge and Subsistence (LKTKS) Protocol (hereinafter "Protocol").

BSEG is an organization of 38 member Tribes from the Kuskokwim Bay to the Bering Strait. Our mission is to speak and work together as one voice to protect and respect our traditional ways of life, the ocean web of life that supports the resources we rely on, and our children's future. BSEG's Elder Representatives were selected by their tribal councils and are messengers to our children and the people who make decisions that affect our marine resources, ecosystem, and ways of life.

BSEG has long prioritized our peoples' traditional knowledge (TK) and its inclusion into federal management structures and decision-making processes. Our organization has passed multiple resolutions affirming the importance of this living body of knowledge and the manner in which it is inextricably intertwined with our people's identity, culture, values, and ways of life. We applaud the North Pacific Fishery Management Council (NPFMC) for supporting the development of a Protocol designed to enhance federal fishery management in the Bering Sea.

I'd like to emphasize several key points:

1. The LKTKS Protocol and Onramp recommendations documents are excellent as they are and should not undergo any substantial revisions during the upcoming final Taskforce meeting and the NPFMC October 2023 meeting.
2. The protocol is critically important because it creates a pathway for TK to be incorporated into Council decision-making processes. And, regarding the guidelines included in Section 4: we appreciate the detail provided regarding how to best identify, analyze, and incorporate local knowledge (LK), TK, and subsistence (S) information within the context of the Council's process, and the suggestions for actions the Council can take to implement these guidelines.
3. The LKTKS Taskforce's work is of national significance. The Taskforce has completed a significant amount of work in a short period of time, and have met their mandate to develop a Bering Sea Fishery Ecosystem Plan (FEP) action module.
4. As emphasized in National Standard 2 of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), "*conservation and management measures shall be based upon the best scientific information available.*"



Bering Sea Elders Group

5. From epistemic, policy, and management perspectives, TK has many fundamental parallel and similar qualities and characteristics to western science.¹ Both TK and the social science of TK have an important role in fisheries management processes. “TK can be of use to fisheries management in comparative, complimentary, and supplemental fashions,”² and the federal government, including the Department of Commerce, have formally recognized this important body of knowledge as one that contributes to the scientific, technical, social, and economic advancements of the United States. The White House has issued government-wide guidance and an accompanying implementation memorandum that covers all agencies.³
6. BSEG also supports the onramp recommendations that the taskforce prepared and is presenting to the Council. Each onramp supports the incorporation of LK, TK, and S information in a unique, fundamental way.
7. Finally, BSEG would like to thank members of the LKTKS Taskforce for their time and dedication to this critically important work.

If adopted and implemented, the LKTKS Protocol and Onramp recommendations will improve Council analyses and decision-making; will result in a more equitable, inclusive, and robust process, including and particularly with regard to Alaska Native Tribal knowledge and voices; and will result in better outcomes for communities, marine ecosystems, and fisheries. Again, we strongly recommend the Taskforce and Council move forward towards full adoption and implementation of the LKTKS products as they are now, without any substantial changes.

Respectfully,

Jaylene Wheeler, Executive Director
BERING SEA ELDERS GROUP

¹ See Julie Raymond-Yakoubian, et al, *The Incorporation of Traditional Knowledge into Alaska Federal Fisheries Management*, 78 Marine Policy 132 (2017), available at: <https://kawerak.org/wp-content/uploads/2018/04/The-incorporation-of-traditional-knowledge-into-Alaska-federal-fisheries-management.pdf>.

² *Id.*

³ The White House, *White House Releases First of a Kind Indigenous Knowledge Guidance for Federal Agencies* (Dec. 1, 2022), all documents available at: <https://www.whitehouse.gov/ceq/news-updates/2022/12/01/white-house-releases-first-of-a-kind-indigenous-knowledge-guidance-for-federal-agencies/>.



Bering Sea Fishermen's Association

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May 31, 2023

North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
L92 Building, 4th Floor
Anchorage, Alaska 99501

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members,

Since 1979, BSFA has worked to support healthy and vibrant fishing communities by fostering greater social, financial, and political capacity to access, sustainably develop and protect fisheries in the Bristol Bay, Arctic, Yukon and Kuskokwim (BBAYK) regions of Alaska. BSFA is committed to the sustainable management of Alaska's resources and serves as a steward of the extraordinary ways of life and cultures of Alaskans. We work to strengthen local communities, support long-term ecological integrity, and stimulate robust economies. BSFA serves 128 communities in the BBAYK regions of Alaska where commercial fisheries and the ocean ecosystem are vital to the economic and cultural fabric of our lives.

BSFA is pleased to comment on the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the North Pacific Fisheries Management Council's (NPFMC) LKTKS Taskforce. We applaud the LKTKS Taskforce and council staff for their work to realize the protocol and onramp recommendations. We believe the protocol is a groundbreaking document that provides information and best practices to incorporate LKTKS information into the Council's decision-making. We recommend that the NPFMC fully adopt the LKTKS Protocol document and to fully implement the recommendations in the Onramp document as they are now, with no substantive changes.

It is encouraging that these recommendations can address greater representation of knowledge of Tribal entities and communities in the NPFMC decision making process that have significant impacts to the livelihoods of our communities. We anticipate that the adoption of this document will set a precedent for advancing LKTKS knowledge systems from a diversity of communities and regions within the Council purview.

Sincerely,

A handwritten signature in blue ink that reads "Karen Gillis". The signature is written in a cursive, flowing style.

Karen Gillis

June 2, 2023

From: Courtney Carothers
Professor of Fisheries
College of Fisheries and Ocean Sciences
University of Alaska Fairbanks
1007 W. 3rd Avenue, Suite 100
Anchorage, AK 99508

To: Simon Kinneen (NPFMC Chair) and David Witherell (NPFMC Executive Director)
Dr. Kate Haapala and Dr. Sarah Wise (NPFMC LKTKS Taskforce Co-Chairs)
1007 W. Third Ave, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501-2252
Submitted via NPFMC portal at: <https://meetings.npfmc.org/Meeting/Details/2991>

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members,

I am grateful for the opportunity to provide comments on the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the Council's LKTKS Taskforce. I am a Professor Fisheries at the University of Alaska Fairbanks who has a long history of ethnographic research in Alaska fisheries. I am also a member of the Social Science Plan Team. I offer my personal comments as a social scientist who has long advocated for the increased inclusion of Indigenous Peoples and knowledge systems and sociocultural data in fisheries science and decision-making.

I applaud the hard and excellent work of the LKTKS Taskforce! The LKTKS Protocol should be adopted and the Onramp recommendations should all be prioritized and implemented. The collective work of the Taskforce to advance these documents, as well as other products such as the LKTKS Search Engine and analytical template, is exemplary and provide important context and support tools for the inclusion of LKTKS data and considerations for the Council moving forward.

This Taskforce and its work products are an excellent model and are consistent with other recent national priorities, such as NOAA's Equity and Environmental Justice Strategy and the White House Office of Science and Technology Policy and Council on Environmental Quality's Guidance for Federal Departments and Agencies on Indigenous Knowledge (<https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf>).

This guidance "*reaffirms that Agencies should recognize and, as appropriate, apply Indigenous Knowledge in decision making, research, and policies across the Federal Government.*" (3) This guidance also clearly states: "**Agencies should also include Indigenous Knowledge as an aspect of best available science.** A number of legal standards requiring the consideration of scientific information can also permit the consideration of Indigenous Knowledge. Agencies should consider evaluating the standards applicable to their work to decide whether the consideration of Indigenous Knowledge should be referenced explicitly in agency regulations or policies." (19) This guidance is consistent with that in

the LKTKS documents that note that “Agencies do not need to judge, validate, or evaluate Indigenous Knowledge using other forms of knowledge in order to include Indigenous Knowledge in Federal policy, research, or decision making.” (16)

Given the particular history of violence against Alaska Native Peoples and their languages, knowledge, and governance systems, it is also particularly important for NOAA and the Council to recognize the need for elevating consideration of the 10,000+years deep Traditional Knowledge in all Council decision-making. The recent federal guidance is helpful for additional context.

At times, Western science has been used as a tool to oppress Tribal Nations and Indigenous Peoples. Indigenous Peoples in the United States have experienced significant unethical health research abuses, including the use of genetic data and health records without their knowledge or consent. For example, the pseudoscience embodied in the eugenics movement, with the collaboration of scientists and medical providers, resulted in the forced sterilization of Indigenous women across the Nation. Indigenous Knowledge has also been historically marginalized in scientific communities and excluded from research and academic resources, funding, and other opportunities. Federal decisionmakers have also excluded Indigenous Knowledge from research and policy decisions. This marginalization has resulted from a lack of awareness, unfamiliarity and methodological dogma, and, too often, racism and imperialism. Some Federal decisionmakers have taken strides to address these historical wrongs and elevate Indigenous Knowledge, but more work remains. This guidance provides considerations and practices to further the important work of ensuring that Agencies appropriately include Indigenous Knowledge, while respectfully working with the Tribes and Indigenous Peoples who hold it.” (5)

As well this important federal guidance suggests that federal agencies and federal bodies such as the Council should:

Acknowledge Historical Context and Past Injustice. Understanding the different experiences of Tribal and Indigenous Peoples is critical for Agencies to work with them and engage effectively with Indigenous Knowledge. Agencies should acknowledge the history of the department or agency they represent, and the Federal Government broadly, when working with Tribes and Indigenous Peoples. Recognizing past injustice, while upholding Tribal treaty and reserved rights, and respecting Tribal and Indigenous communities, cultures, and values will assist Agencies in developing collaborative processes that are more equitable and inclusive of Indigenous Peoples and their knowledge systems. (8)

Also consistent with LKTKS documents, this federal guidance highlights that:

Agencies must respect the sovereignty of Tribal Nations and conduct outreach through the appropriate forums and with respect for the Nation-to-Nation relationship and the United States’ trust responsibilities. Agencies should discuss plans for direct engagement with Tribal Nations or Indigenous Peoples and ensure sustained engagement throughout the development or implementation of the activity. When engaging with Indigenous Knowledge holders who are members of Federally-recognized Tribes, Agencies should be mindful of Tribal sovereignty and recognize that Tribal leaders grant consent for the sharing of Indigenous Knowledge. Agencies should engage only with such individual knowledge holders designated by Tribal leadership. (10)

Lastly, a minor point is to suggest a more common usage of not capitalizing local knowledge; capitalizing Indigenous terms such as Traditional Knowledge and Indigenous Knowledge is customary and shows respect for Indigenous Peoples and their knowledge systems. Capitalizing local knowledge is not customary and can reflect a false equivalency.

I appreciate the opportunity to provide these comments. I strongly support the adoption and implementation of the LKTKS Protocol and Onramp recommendations. They will improve Council analyses and decision-making; they will advance equity and relationship- and trust-building, particularly with Alaska Native Tribes and Tribal citizens.

Sincerely,

A handwritten signature in cursive script that reads "C. Carothers".

Courtney Carothers



Chevak Traditional Council

P.O. Box 140

Chevak, Alaska 99563

(907) 858-7428 fax (907) 858-7812

chevaktc@gmail.com

June 1, 2023

North Pacific Fishery Management Council
1007 West 3rd Ave., Ste. 4002
L92 Blg. 4th Fl.
Anchorage, Alaska 99501

Re. Call for Comments for LKTKS Protocol/Onramps Protocols

Attn: Simon Kinneen (Chair); David Witherall (Exec. Dir.); Dr. Haapala & Dr. Wise (Co-Chairs)

The Chevak Native Village is a federally recognized Tribal Government for the Kashunamiut People. We represent just over 2000 tribal members through the Chevak Traditional Council for their Health, Safety and Welfare. The Chevak Native Village is honored for the opportunity to comment on the NPFMC's; Local Knowledge & Traditional Knowledge (LK&TK) Protocol and OnRamps Recommendations. The Chevak Traditional Council is appreciative of the groundbreaking unprecedented protocols and approach to incorporate LK&TK into the your decision making process. Because we've looked to our elders and wisdom for our guidance as our unwritten laws; we stand behind the NPFMC's leadership in the inclusion of LK&TK into your management and decision making process.

We are a predominantly subsistence community; the natural resources in our waters are of a great importance to our community and we rely on the Bering Seas for their continued replenishment and ongoing abundance. We never take more than we need. As subsistence users we practice our traditional teachings past on from generation to generation and wish to continue to do so; NPFMCs' endeavor to use Traditional Knowledge into their decision making practices compliments our hopefulness that our children will have the same experiences as we've seen.

At this time we have reviewed the Protocols and OnRamp Recommendations and support them as they are and that there need not be any revisions that would be substantive in nature. The protocols and the recommendation set forth are a huge accomplishment for the time the LK&TK Taskforce was allotted. The LK&TK Taskforce Protocols and Recommendations meets their mandate towards the Bering Sea Ecosystem Plan (FEP). The adoption of the documents that the

LK&TK Taskforce presents as they are now; as is; will have greater outcomes for the diverse communities.


The Chevak Native Village:


1st Chief


2nd Chief


Secretary/Treasurer


Member


Member

Daborah Anungazuk
self
06/02/2023 03:28 PM AKDT

RE: Please leave all comments on the Protocol and onramp recommendations here.

Good Morning: Date: June 2, 2023 To: North Pacific Fishery Management Council From: Daborah A Anungazuk Subject: Comments on the LKTKS Protocol and Onramps documents North Pacific Council members, My name is Daborah A Anungazuk and I live in Golovin Alaska. I am a tribal member of the Chinik Eskimo Community. I have subsistence fished at Kitchavik River all my life. I am also the longest surviving person who continue to subsistence fish in the Kitchavik River, and have fished from Golovin all my life and will be 68 years of age this month. No one can take that from me. I learned from many families and have learned most of the legends in an around that area. I am a shareholder of the Golovin Native Corporation and have inherited my families fish camp and have in one way or another, help instruct what I learned. The MLO Schools of Golovin has retained me for 33 years as the Bilingual/Bicultural Instructor and understand that the first kids I taught, now have grandchildren going to school and fish. I was born just before the 1955 fish drying season, so while my family seined, cut and hung & dry fish, I was on the river bank either with my family or had someone babysitting me while they cut fish. Working with the people who have passed on, we have shown how we fish; gather roots, berries and greens all over our lands. I myself learned by cutting white fish for drying, we continue this practice today. I am writing to encourage you to adopt the Protocol and Onramps documents created by the Local Knowledge, Traditional Knowledge and Subsistence Taskforce. This Protocol is particularly important to Golovin because we realize how important it is to have a method to comment on all or most aspects of our fishing, and being able to continue our way in a traditional lifestyle. We want our voices to be heard in federal fisheries management We want our Traditional Knowledge to be included in fisheries management We want to ensure the health and sustainability of the Bering Sea ecosystem and these protocols will result in the better and more comprehensive incorporation of our knowledge and concerns, which can significantly contribute to ecosystem based fisheries management Additionally, The Taskforce included robust representation from western Alaska Tribes and Tribal organizations, including Tribal members and Elders The Taskforce used an transparent and inclusive public process We believe the guidelines in the Protocol, if implemented across the NPFMC process, will improve decision-making, move the NPFMC towards a more equitable process, and lead to better outcomes for our fisheries and ecosystem I especially like Protocol guideline where you can use traditional knowledge in our comments that can ensure our way of life, You can find the guidelines in the Protocol document here: <https://meetings.npfmc.org/Meeting/Details/2991>). We ask the NPFMC to adopt the LKTKS Protocol in its entirety, along with the Onramps document, and to immediately begin implementation of both. By this email, consider that my testimony is signed. Thank you, _____ Daborah A Anungazuk - Signed Tribal Member of Chinik Eskimo Community



United States Department of the Interior



U.S. FISH AND WILDLIFE SERVICE
1011 East Tudor Road
Anchorage, Alaska 99503

In Reply Refer to:
FWS/R7/FES

Ms. Kate Haapala
North Pacific Fisheries Management Council
1007 West 3rd Avenue, Suite 400
L92 Building, 4th floor
Anchorage, Alaska 99501

Dear Ms. Haapala:

Thank you for the opportunity to review the North Pacific Fisheries Management Council's (Council) Local Knowledge (LK), Traditional Knowledge (TK), and Subsistence Protocol (Protocol) and onramp recommendations developed by the LKTKS Taskforce. The U.S. Fish and Wildlife Service (Service) provides the following input and feedback.

- The Service appreciates the efforts being taken by the Council to incorporate LKTK into its processes. We look forward to working with the Council to implement the final recommendations. When adopted, the Protocol and onramp recommendations will make positive steps forward to include Alaska Native Tribal perspectives in Council processes. We encourage the Council and its supporting bodies to continue to pursue additional avenues to ensure meaningful participation for Alaska Natives in Council decision making processes. Possible additional options for the Council to explore in the future could include, but is not limited to:
 - During the revision of the Magnuson-Stevens Fishery Conservation and Management Act (MSA), consider adding indigenous representation and membership on the Council; and,
 - Formalize opportunities for indigenous elders to speak on issues before a vote is set in motion (in addition to speaking during public hearings) to encourage greater two-way dialogue and knowledge sharing.
- The Federal Subsistence Management Program is a great source for LKTK through the Federal Subsistence Board, the 10 Subsistence Regional Advisory Councils, and the Office of Subsistence Management. Thank you for working with these entities to raise awareness of bycatch. We hope the Council will continue to consult with these resources in future planning and implementation of the LKTK protocols on onramp recommendations.
- Another key aspect of the Protocol worth highlighting is the concept of regulatory fatigue as listed in 3.6 of the Protocol. Knowledge holders may experience 'regulatory fatigue,' a scenario described by members of the Taskforce that can result from impacted fishery stakeholders and/or Tribal representatives having to engage with multiple processes and meetings to make their perspectives, experiences, and asks known. Due to this dynamic, it is

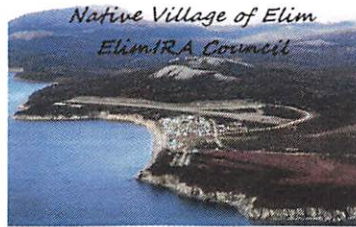
paramount to ensure that there is organizational alignment and efficiencies built into the process that allows for information sharing within the Council and managing entities while also identifying a pathway for executive leaders and their committees to also gain access to the LKTK that is being garnered. For example, as broader ecosystem concerns are raised through the use of the Protocol and perhaps beyond the purview of the Council, a process for elevating those concerns could be developed to share this information with bodies such as the National Oceanic and Atmospheric Administration's Ocean Resource Management Subcommittee for further review.

- Lastly, once adopted, please consider developing a streamlined version of the Protocol and onramp recommendations that is easier to consume by the public and contains less lengthy references to Council related policy. These steps may help to encourage greater Tribal and public participation and better overall understanding of the Protocol and onramp recommendations.

Thank you for the opportunity to comment. Should you have any questions please contact, Aaron Martin via email at aaron_e_martin@fws.gov.

Sincerely,

Assistant Regional Director,
Fisheries and Ecological Services



Date: June 1, 2023

To: North Pacific Fishery Management Council
Simon Kinneen, Chairman
Kate Haapala, LKTKS Co-Chair

From: Native Village of Elim

Subject: Recommendation for Adoption of the LKTKS Protocol and On-ramps

Dear Chairman Kinneen, Council members and Dr. Haapala,

The Native Village of Elim is writing to recommend that the NPFMC **adopt in-full and implement** the Local Knowledge, Traditional Knowledge and Subsistence Taskforce's Protocol and On-ramps, as they are currently written.

Our Tribal government represents our Tribal members and their interests, including in federal fisheries management. We have long standing concerns about the lack of Traditional Knowledge in NPFMC decision making, and the lack of Tribal representation in NPFMC decision-making. We are very supportive of efforts that emphasize the importance of respect when working with our community, the value of Traditional Knowledge, and the role of and importance of working with knowledge holders – all of which the LKTKS Protocol and Guidelines do.

Our Tribal government also supports the recommendations of the taskforce in the on-ramps document – for example, the need to improve NPFMC social science and TK capacity, expanding Tribal representation on NPFMC bodies, and the other nine recommendations.

The Native Village of Elim supports the work of the LKTKS Taskforce and we believe that if the NPFMC adopts and implements the Protocol and on-ramps that there will be improvements in decision-making and in outcomes that impact Tribal communities and Tribal members.

Thank you for considering our comments,

Robert A Keith

A handwritten signature in black ink that reads "Robert A Keith". The signature is written in a cursive style.

Native Village of Elim President

CHINIK ESKIMO COMMUNITY
Native Village of Golovin
P.O. BOX 62020
Golovin, Alaska 99762
(907) 779-2214 Fax (907) 779-2000

Date May 31, 2023

To: North Pacific Fishery Management Council

From: Chinik Eskimo Community, Golovin, AK

Re: Request for NPFMC Adoption of the LKTKS Protocol and On-ramps

Dear Chairman Kinneen and Council members,

Chinik Eskimo Community (CEC) is the Tribal government for Golovin, Alaska. Our community is located in Golovin Bay in northern Norton Sounds. Our Tribal members have generations-deep relationships with salmon and the marine ecosystem. We are stewards of the lands and waters around us and are keepers of the Traditional Knowledge of our Tribe.

CEC has long advocated for the incorporation of Traditional Knowledge, Tribal voices, and Indigenous people in fisheries management. We are pleased to see the NPFMC taking steps to address these issues through the creation of the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Taskforce, and the creation of the LKTKS Protocol and on-ramps.

We believe that the Guidelines included in the Protocol are both necessary and long-overdue, and that the “on-ramp” recommendations from the Taskforce require action in order for the Protocol to be fully implemented. We congratulate the Tribal members and other Taskforce members on their work.

Chinik Eskimo Community recommends that the NPFMC fully adopt the LKTKS Protocol and on-ramps, as they are currently written. We would also recommend that the Protocol Guidelines become part of the NPFMC policies.

We look forward to the positive impacts for Tribal communities that will result from adoption and implementation of the LKTKS Taskforce’s work.

Thank you



Charlie Brown

CEC President

Henry Huntington
Huntington Consulting
05/19/2023 10:19 AM AKDT

RE: Please leave all comments on the Protocol and onramp recommendations here.

The LKTKS Protocol and Onramps documents are a clear description of how the NPFMC can better engage with Local Knowledge and Traditional Knowledge and those who hold such knowledge. Doing so is essential to the credibility and performance of the NPFMC. The steps outlined are appropriate and reasonable, and have a high likelihood of achieving the desired goal if followed properly. Shortcuts and half-measures will not work. I have been working with Traditional Knowledge in various ways for over 30 years, and the Protocol and Onramps are a powerful distillation of everything I have learned in that time. The LKTKS Taskforce has done an admirable job of laying out what needs to be done and why. Please follow their expert and excellent guidance.



KAWERAK, INC.

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomedede

Inaliq

Elim

Neviarcuarluaq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Iglaaruk

Nome Eskimo

Sitnasuami Inuit

Savoonga

Sivungaq

Shaktoolik

Saktuliq

Shishmaref

Kigiqtaq

Solomon

Anuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tupqaqruk

Unalakleet

Uqalaqtiq

Wales

Kinjigin

White Mountain

Natchigvik

Tungwenuk Family Qupak Design, used with permission

Date: May 23, 2023

From: Melanie Bahnke, President
Kawerak, Inc.
PO Box 948
Nome, AK 99762

To: Simon Kinneen (NPFMC Chair) and David Witherell (NPFMC Executive Director)
Dr. Kate Haapala and Dr. Sarah Wise (NPFMC LKTKS Taskforce Co-Chairs)
Submitted via NPFMC comment portal

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members,

Kawerak is writing to provide comment on the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the NPFMC's LKTKS Taskforce. Kawerak is the non-profit Tribal Consortium for the 20 federally-recognized Tribes of the Bering Strait region.

Kawerak strongly commends the work of the Taskforce, and we applaud the Council's prioritization of this Action Module of the Bering Sea Fishery Ecosystem Plan (BS FEP). We believe the LKTKS Protocol and Onramp recommendations document are excellent as they are, and should not undergo any substantial revisions during the upcoming final Taskforce meeting and the NPFMC October 2023 meeting.

Additionally, at its upcoming October 2023 meeting, we request that the Council fully support and adopt the Protocol, and fully support, begin implementation, and lay out a strategy for complete implementation of the Onramp recommendations as well. We recognize the Council may choose to implement only some of the onramps initially, but we believe that strategically planning to implement them all will improve the Council process for Tribes, stakeholders, and the public generally; will support the Council's Ecosystem Policy and the goals outlined in the BS FEP; significantly advances Council and Agency goals related to meeting various National Standard mandates - including National Standard 2 with regard to the use of the best scientific information available; and is in alignment with goals, mandates, and guidance related to TK; diversity, equity, inclusivity, and environmental justice; Tribal Consultation; and Ecosystem-Based Fishery Management (EBFM).

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

Advancing the capacity of our people and tribes for the benefit of the region.

In addition to the Protocol and Onramps documents, the Taskforce has also created other products of great value, including the LKTKS Search Engine and the analytical template for staff. Additionally, the Taskforce's process can be seen as an exemplary model. The Taskforce built upon the transparent and inclusive BS FEP process, and in the Taskforce's work it brought together LK, TK and Tribal experts, scientists (including social scientists with TK expertise), and Council and Agency staff. All of this speaks to what may be the Council's most intentionally-developed collaborative cross-cultural product and its most significant activity to-date in terms of ensuring robust inclusion of Tribal perspectives in the Council process. What the Taskforce has produced is impressive and of national significance.

The Protocol provides a framework covering the appropriate and necessary scope related to this topic. This includes a discussion and definition of terms and concepts, which among other things provides a useful basis for understanding, respecting, appreciating, and engaging with various knowledges and knowledge systems. The Protocol also includes reflections on challenges related to implementing the Council's goals related to LK, TK, and subsistence information, and provides guidelines for moving this work forward. The eight Guidelines included in the Protocol provide guidance and associated recommendations to the Council for how to equitably incorporate multiple knowledge systems into its processes and outcomes. Some of the many important elements of this work include, to name just a few, the paramount importance of respect (Guideline 1), insight into accurately identifying knowledge and knowledge holders (Guideline 3), the importance of building capacity (Guideline 7), and information about navigating multiple knowledge systems (Guideline 8). The 11 onramp recommendations were carefully developed to assist the Council in implementing the Protocol and Guidelines, and address areas that need attention such as Tribal Consultation and engagement, staff capacity, and other issues.

If adopted and implemented, the LKTKS Protocol and Onramp recommendations will improve Council analyses and decision-making; will result in a more equitable, inclusive, and robust process including and particularly with regard to Alaska Native Tribal knowledge and voices; and will result in better outcome for communities, marine ecosystems, and fisheries. Again, we strongly recommend the Taskforce and Council move forward towards full adoption and implementation of the LKTKS products as they are now without any substantial changes.

Sincerely,
KAWERAK, INC.

M. David for M. Bahnke

Melanie Bahnke, President

KAWERAK, INC.

PO Box 948 • Nome Alaska 99762 • 907.443.5231 • www.kawerak.org

Advancing the capacity of our people and tribes for the benefit of the region.



KUSKOKWIM RIVER

INTER-TRIBAL FISH COMMISSION

OUR RIVER, OUR PEOPLE, OUR FISH

P.O. Box 190 Bethel, AK 99559-0190 | (907) 545-7388 | info@kritfc.org | kuskosalmon.org

June 2, 2023

Simon Kinneen, NPFMC Chair
David Witherell, NPFMC Executive Director
Dr. Kate Haapala and Dr. Sarah Wise, NPFMC LKTKS Taskforce Co-Chairs
1007 W. Third Ave, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501-2252

Submitted via NPFMC portal at: <https://meetings.npfmc.org/Meeting/Details/2991>

Re: Supporting LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members,

The Kuskokwim River Inter-Tribal Fish Commission (KRITFC) is an inter-Tribal consortium serving the 33 Federally recognized Tribes of the Kuskokwim River watershed. The mission of KRITFC is to develop and maintain a meaningful role for Tribes and Federally qualified subsistence users to engage in Kuskokwim fisheries management by sustainably managing and rebuilding healthy salmon and other fish populations. Its appointed Tribal Fish Commissioners, elected Executive Council representatives, and elected In-Season Managers rely on Yup'ik and Athabascan Dené Indigenous, Traditional, and Local Knowledge and sound salmon science to guide their management actions and research and monitoring priorities. KRITFC has been cooperatively managing the federal subsistence salmon fishery of the Kuskokwim River for eight years.

KRITFC applauds the work of the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Task Force and strongly supports the LKTKS Protocol and Onramp recommendations document as written and without any substantial revisions during the upcoming Task Force and NPFMC meetings in October 2023. KRITFC also strongly commends the NPFMC's prioritization of this Action Module of the Bering Sea Fishery Ecosystem Plan.

KRITFC agrees with the recognition contained within the Protocol that the Bering Sea is “undergoing major ecological and climatological shifts that are increasingly extreme and difficult to accurately predict” and “that western scientific methods of observation and study cannot keep pace with the on-the-ground changes.” KRITFC also appreciates the Protocol's recognition that the current period of environmental changes is greatly impacting subsistence harvests and traditional tribal ways of life.

TELIDA | NIKOLAI | TAKOTNA | MCGRATH | LIME VILLAGE | STONY RIVER | SLEETMUTE | RED DEVIL
GEORGETOWN | CROOKED CREEK | NAPAIMUTE | CHUATHBALUK | ANIAK | UPPER KALSKAG | LOWER KALSKAG | TULUKSAK
AKIAK | AKIACHAK | KWETHLUK | BETHEL | OSCARVILLE | NAPASKIAK | NAPAKIAK | KASIGLUK | ATMAUTLUAK
NUNAPITCHUK | TUNTUTULIAK | EEK | QUINHAGAK | KONGIGANAK | KWIGILLINGOK | KIPNUK | CHEFORNAK

Local and Indigenous Knowledge bearers are often the first to witness changes to ecosystem services that link the Bering Sea together with the Kuskokwim River and its associated freshwater and terrestrial systems. Indigenous observations and stewardship concerns regarding these environmental changes predate their acknowledgement by western science. Indigenous Knowledge and science are inherently holistic and grounded in ecosystem principles and for too long have been absent in regulatory decision-making or centered through collaborative management practices.

The time for the Council to act is now with full support and adoption of the LKTKS Protocol at its upcoming October 2023 meeting, and fully supporting a comprehensive strategy for complete implementation of all Onramp recommendations. Adoption of the Protocol and Onramp recommendations in full presents opportunities for the NPFMC to broaden its scope of the “best scientific information available” into their decision-making process consistent with the Magnuson-Stevens Act National Standard 2 and the goals, mandates, and guidance related to Traditional Knowledge, diversity, equity, inclusivity, environmental justice, Tribal Consultation, and Ecosystem-Based Fishery Management.

While KRITFC fully supports the adoption of the LKTKS Protocol as written as well as the complete package of Onramp recommendations without substantial revision, KRITFC contends that the best method of including Local and Traditional Indigenous Knowledge in decision-making is through formal co-management partnerships.

Sincerely,



Jonathan Samuelson
Chair, KRITFC



Kevin Whitworth
Executive Director, KRITFC

From: Brooke Woods
149 Woodhole Road
Falmouth, MA 02540

To: Simon Kinneen and David Witherell
Dr. Kate Haapala and Dr. Sarah Wise
1007 W. Third Ave, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501-2252
Submitted via NPFMC portal at: <https://meetings.npfmc.org/Meeting/Details/2991>

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Taskforce members and Council members,

My name is Brooke Woods, I am from Rampart, Alaska on the Yukon River. I am a mother, traditional fisherwoman, fisheries science student at UAF, and I'm a member of 10 boards, voluntarily serving our salmon and Tribes. I currently employed as the climate adaptation specialist for Woodwell Climate Research Center's Permafrost Pathways Project I am writing to provide support for the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents created by the LKTKS Taskforce.

I appreciate the good work of the of the Taskforce and grateful that the Council is prioritizing the Action Module of the Bering Sea Fishery Ecosystem Plan (BS FEP). The LKTKS Protocol and Onramp recommendations document should remain unchanged, there has been incredible amount of work put into the document and should not be altered. Please support the document in its original form. The Protocol document provides the Council foundational information for working with these knowledge systems, but the primary content for how to best work with LK, TK, and subsistence information within the Council's process.

As stated in the LKTK protocol document, the Bering Sea ecosystem is a rich productive marine environment that supports important fisheries, communities, and livelihoods. The Alaska Native have been a part of this ecosystem since time immemorial and this stewardship with be a guiding principle in the face of change and challenges. Alaska Native peoples have adapted and remain resilient in the time of difficult changes to way of life, traditional territories, and hunting, fishing, and gathering. The Traditional users people hold deep understanding to the the Bering Sea and riverine systems connected to it. We value the marine mammals, fish,

waterfowl, and land animals that sustain our families and communities. The LKTK protocols enriches and creates a stronger process for all sectors to have meaningful representation and equity that is understandable to decision makers.

The Protocol encompasses a framework and guidelines that is greatly needed in the council process. Not all Tribal members have the opportunity to attend in or testify to the issues and needs of their fisheries so I see the LKTK protocol as a way to support their way of life. The eight Guidelines included in the Protocol provide guidance and recommendations to the Council for how to equitably incorporate multiple knowledge systems into its processes and decisions. Some of the important pieces of work include respect (Guideline 1), insight into accurately identifying knowledge and knowledge holders (Guideline 3), the importance of building capacity (Guideline 7), and multiple knowledge systems (Guideline 8). A high degree of work was put into the 11 onramp recommendations for the Council to implement Protocol and Guidelines, and speaks to the need for Tribal Consultation and engagement, staff capacity, and other issues.

If adopted and implemented, the LKTKS Protocol and Onramp recommendations will improve Council decision-making, create equity in the process, incorporation of Alaska Native knowledge and stewardship. Overall this work is good for fishing communities and families, marine ecosystems, and rivers.

Again, I fully support and recommend the Taskforce and Council adopt as written and implement the LKTKS documents.

Sincerely,

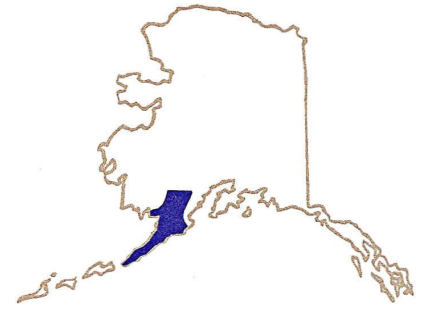
Brooke Woods
Tribal Citizen Rampart Village



Lake and Peninsula Borough

P.O. Box 495
King Salmon, Alaska 99613

Telephone: (907) 246-3421
Fax: (907) 246-6602



May 31, 2023

From: Nathan Hill, Manager
Lake and Peninsula Borough
King Salmon, AK 99613

To: Simon Kinneen (NPFMC Chair) and David Witherell (NPFMC Executive Director)
Dr. Kate Haapala and Dr. Sarah Wise (LKTKS Taskforce Co-Chairs)
1007 W. Third Ave, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501-2252
Submitted via NPFMC portal at: <https://meetings.npfmc.org/Meeting/Details/2991>

Re: LKTKS Protocol and Onramp Recommendations

Dear Chair Kinneen, Director Witherell, Council members, and LKTKS Taskforce Chairs,


The Lake and Peninsula Borough (LPB) appreciates the opportunity to comment on the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the NPFMC's LKTKS Taskforce.

LPB is comprised of 17 communities of Yup'ik, Dena'ina, and Alutiiq heritage. The Borough spans three distinct areas of southwestern Alaska: the Lake Iliamna Area, the Upper Peninsula Area, and the Chignik Area. Our region is diverse, but LPB communities and residents all share in relying on and greatly valuing sustainable and equitable management of fisheries and fishing opportunities.

LPB commends the work of the Taskforce, and the Council's commitment to improving science and decision-making processes and outcomes through the inclusion of Alaska Native knowledge and value systems and subsistence information.

LPB supports the Council in adopting the LKTKS Protocol and Onramps documents as a means to meet mandates and guidance associated with use of best available science and addressing long-term and emerging equity and environmental justice concerns. These documents also provide a path forward to help ensure that trust, respect, and understanding underpin the Council's outreach, engagement, and responsibility to Tribes as climate change impacts and increasing uncertainty become more prevalent.

Sincerely,



Nathan Hill
Borough Manager

Date: May 30, 2023

To: Chairman Simon Kinneen
North Pacific Fishery Management Council

From: Nome Eskimo Community Tribal Government

Re: **Recommendation to Adopt the LKTKS Protocol**

North Pacific Council members,

Nome Eskimo Community is the Tribal governing body representing over 3,400 Tribal members and their political, social, and cultural interests in the community of Nome and the Bering Strait region.

We are writing to recommend that you adopt the Protocol and Onramps documents created by the Local Knowledge, Traditional Knowledge and Subsistence (LKTKS) Taskforce as written, without any substantial changes.

Our Tribe has long-standing interest in the activities and decisions of the North Pacific Fishery Management Council (NPFMC). Our community has a deep and important relationship to the marine environment, including with salmon. We are extremely concerned about the health of salmon populations in our region, the ability of our Tribal members to access salmon, and about NPFMC management of fisheries that take salmon as bycatch.

We believe this LKTKS Protocol and the associated on-ramps, if adopted and implemented, will amplify Tribal voices in federal fisheries management and will facilitate consistent and meaningful incorporation of Traditional Knowledge and knowledge-holders into NPFMC decision making. These changes will contribute to improved outcomes for our shared ecosystem and for Tribal communities that rely on the marine environment and species like salmon.

The Taskforce, which included representation from Tribal organizations and Tribal members in the Bering Strait region, has worked as a collaborative group for several years to produce the Protocol and on-ramps in a transparent and inclusive process.

While all the guidelines are valuable, we think that Guideline 3 (*"Appropriately and accurately identify LK and TK, LK and TK holders, the social science of LK and TK, and subsistence information"*) is particularly important to ensuring that the best scientific information available – which includes our Traditional Knowledge – is used in NPFMC analyses and decision-making.

We ask the NPFMC to adopt the LKTKS Protocol in its entirety, along with the Onramps document, and to immediately begin implementation of both.

Thank you,



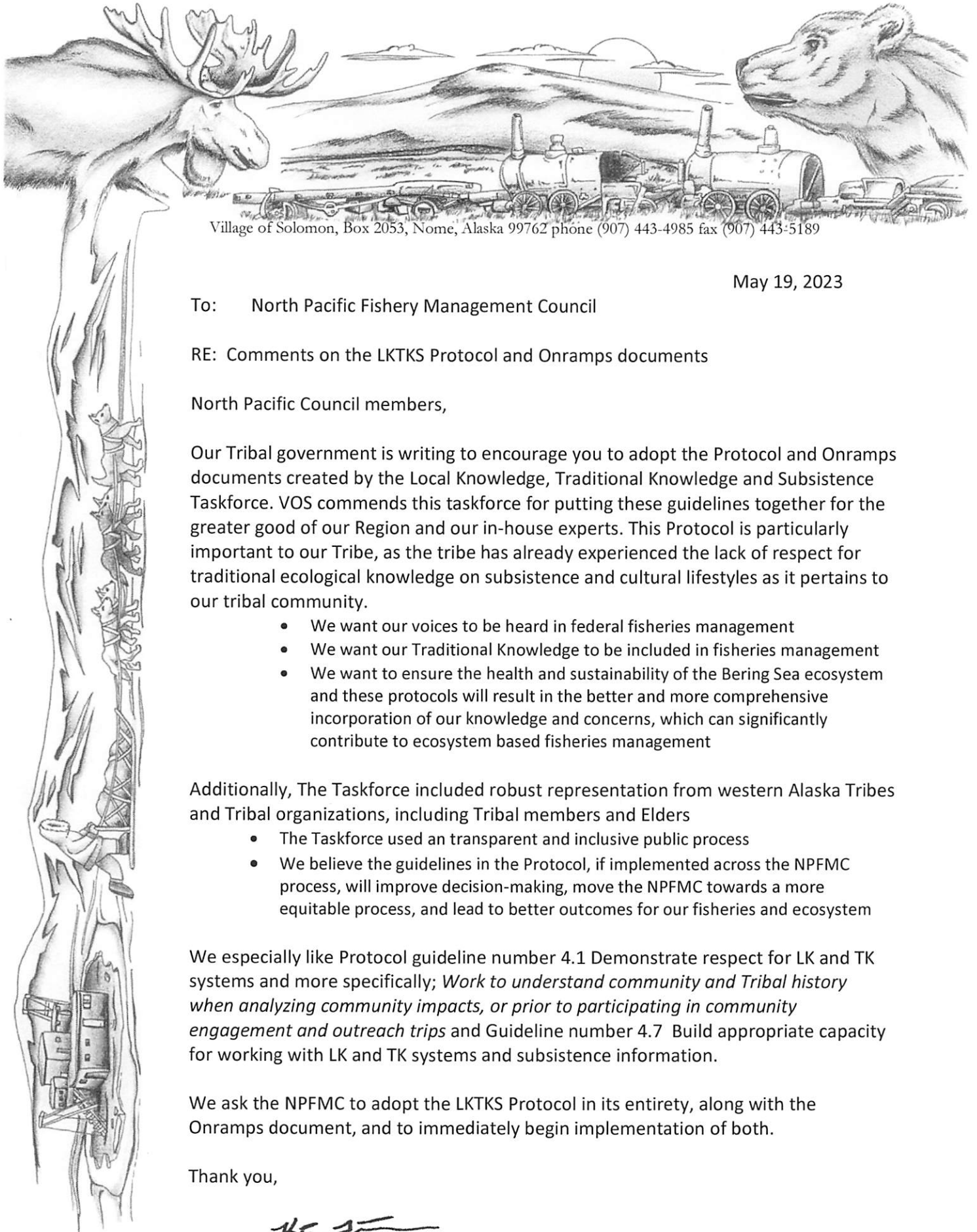
Loretta Bullard

Nome Eskimo Community
Tribal Council President

Jackie Boyer
Native peoples action
06/02/2023 05:57 PM AKDT

RE: Please leave all comments on the Protocol and onramp recommendations here.

NPA asks that the council fully adopt the LKTKS Protocol document and to fully implement the recommendations in the Onramp document as they are now, with no substantive changes We appreciate the work from the taskforce and the voices from western Alaska Tribal members and Elders and others who work for Tribes and Tribal organizations. The Protocol document has a series of Guidelines for how the NPFMC can appropriately and respectfully engage with LK, TK and Subsistence information and knowledge holders in their work. We thank the task force members for their work and appreciate the council acknowledging and adopting their recommendations



Village of Solomon, Box 2053, Nome, Alaska 99762 phone (907) 443-4985 fax (907) 443-5189

May 19, 2023

To: North Pacific Fishery Management Council

RE: Comments on the LKTKS Protocol and Onramps documents

North Pacific Council members,

Our Tribal government is writing to encourage you to adopt the Protocol and Onramps documents created by the Local Knowledge, Traditional Knowledge and Subsistence Taskforce. VOS commends this taskforce for putting these guidelines together for the greater good of our Region and our in-house experts. This Protocol is particularly important to our Tribe, as the tribe has already experienced the lack of respect for traditional ecological knowledge on subsistence and cultural lifestyles as it pertains to our tribal community.

- We want our voices to be heard in federal fisheries management
- We want our Traditional Knowledge to be included in fisheries management
- We want to ensure the health and sustainability of the Bering Sea ecosystem and these protocols will result in the better and more comprehensive incorporation of our knowledge and concerns, which can significantly contribute to ecosystem based fisheries management

Additionally, The Taskforce included robust representation from western Alaska Tribes and Tribal organizations, including Tribal members and Elders

- The Taskforce used an transparent and inclusive public process
- We believe the guidelines in the Protocol, if implemented across the NPFMC process, will improve decision-making, move the NPFMC towards a more equitable process, and lead to better outcomes for our fisheries and ecosystem

We especially like Protocol guideline number 4.1 Demonstrate respect for LK and TK systems and more specifically; *Work to understand community and Tribal history when analyzing community impacts, or prior to participating in community engagement and outreach trips* and Guideline number 4.7 Build appropriate capacity for working with LK and TK systems and subsistence information.

We ask the NPFMC to adopt the LKTKS Protocol in its entirety, along with the Onramps document, and to immediately begin implementation of both.

Thank you,

Kirsten Timbers, President

May 30, 2023

Mr. Simon Kineen, Chair
North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501-2252

Mr. John Kurland, Regional Administrator
NOAA Fisheries, Alaska Region
709 West Ninth Street
Juneau, AK 99802-1668

RE: Local Knowledge, Traditional Knowledge, and Subsistence Information Protocol

Dear Mr. Kineen, Mr. Kurland, Council members and members of the public,

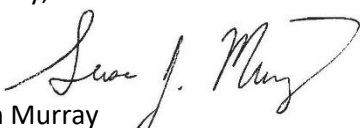
Oceana fully supports the incorporation of Local Knowledge, Traditional Knowledge, and Subsistence (LKTS) information into the North Pacific Fishery Management Council's decision-making process through the adoption of the LKTS Protocol and guidelines.¹ This is a crucial, long-overdue step towards creating more inclusive and effective decision-making processes in fisheries and ecosystem management that acknowledge and respect the value of diverse knowledge systems.

The LKTS Protocol and guidelines consist of eight guidelines that provide a comprehensive framework for incorporating LK, TK, and subsistence information into regulatory decision-making. These guidelines are:

- Demonstrating respect for LK and TK systems.
- Understanding and using the appropriate concepts for LK, TK, and subsistence.
- Understanding the legal context for LK, TK, and subsistence.
- Engaging in early and frequent communication with relevant entities.
- Adhering to local and cultural protocols that entities have established for sharing and communicating LK, TK, or subsistence information.
- Acknowledging and accounting for differences in capacity among relevant entities.
- Building appropriate capacity for working with LK and TK systems and subsistence information.
- Understanding how to navigate multiple knowledge systems.

The guidelines provide a roadmap incorporating LK, TK, and subsistence information in a manner that is respectful, inclusive, and effective. The adoption of the LKTS Protocol and guidelines would demonstrate the Council's commitment to working in partnership with Alaska Native Tribes and other relevant entities. It would also serve as a powerful example for other organizations and decision-making bodies to follow, showing that it is possible to integrate diverse knowledge systems in a manner that is respectful and effective. Oceana also supports the eleven "onramp" recommendations of the LKTS Task Force for implementation of the protocol and guidelines.² Oceana urges the Council to adopt the LKTS Protocol and guidelines as a key component of its decision-making process as we all work together for healthy productive ocean ecosystems.

Sincerely,


Susan Murray
Deputy Vice President, Pacific

¹ [LTKTS Protocol APRIL 2023 \(npfmc.org\)](http://LTKTS Protocol APRIL 2023 (npfmc.org))

² [D2 LTKTS Onramp Recommendations \(npfmc.org\)](http://D2 LTKTS Onramp Recommendations (npfmc.org))

750 W. 2nd Avenue
Suite 206
Anchorage, AK 99501



907.258.0224 Telephone
904.258.0223 Facsimile
www.oceanconservancy.org

June 2, 2023

Mr. Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 W. Third Ave, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501

Dr. Jon Kurland, Regional Administrator
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

Dear Chairman Kinneen, Dr. Kurland and Council members:

Ocean Conservancy¹ submits the following comments on the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the NPFMC's LKTKS Taskforce. Ocean Conservancy appreciates the efforts by the LKTKS Taskforce to develop this meaningful document, and we applaud the Council's prioritization of this Action Module as part of the Bering Sea Fishery Ecosystem Plan (BS FEP).

The framework of the LKTKS Protocol and Onramp documents is comprehensive. It defines diverse knowledge systems, including Traditional Knowledge (TK) and Local Knowledge (LK), and identifies and evaluates onramps for these important types of information in fisheries management. Additionally, the conceptualization and drafting of the documents reflects inclusion of diverse voices. The eventual application of these documents in Council management decisions will result in a more equitable and robust process that better considers Tribal and community perspectives and traditional ways of life.

Overall, fishery management will be improved by expanding the included data sources and types. TK, LK and subsistence data are important sources of information about what is happening on the water and in communities, and they can inform fishery managers as they navigate a changing marine

¹ Ocean Conservancy is a non-profit organization working to protect the ocean from today's greatest global challenges. We envision a healthier ocean, protected by a more just world and, together with our partners, create evidence-based solutions for a healthy ocean and the wildlife and communities that depend on it.

ecosystem (Stephenson et al., 2016). In addition, TK can be a meaningful avenue for detecting major shifts in ecosystem function and trophic structure at longer time scales that may vary from more standard quantitative indicators (Raymond-Yakoubian et al., 2017). Including Indigenous peoples' subsistence knowledge will significantly strengthen and increase equity in future Council analyses and decision making.

In summary, Ocean Conservancy recommends no substantial revisions to the document at the upcoming final Taskforce meeting and the NPFMC October 2023 meeting. Instead, we encourage the Council and the LKTKS Taskforce to focus future efforts on the adoption and implementation of these recommendations and onramps and continue to build momentum in the North Pacific to be more inclusive of and equitable to Tribal governments, communities and diverse ways of knowing. Doing so will result in a better outcome for ecosystem and fisheries in the face of climate change.

Thank you for your consideration of our comments and your continued attention to improving equity in fisheries management in Alaska.

Sincerely,



Jonathan S. Ross
Director, Arctic Indigenous-Led Conservation
Ocean Conservancy



Megan Williams, PhD
Fisheries Scientist, Arctic Programs
Ocean Conservancy

Nicholas Parlato
University of Alaska Fairbanks
05/22/2023 11:22 AM AKDT

RE: Please leave all comments on the Protocol and onramp recommendations here.

Thank you for the opportunity to comment on the NPFMC's intended adoption of the LKTKS protocol. Speaking for myself, I fully support the NPFMC to adopt the LKTKS Protocol document in its entirety and with no major changes. In light of current crises and the potential for another famine year for Alaska Native communities in the western part of the state, it is urgent and vital for NPFMC to implement the recommendations in the Onramp document. The LKTKS Protocol will provide NPFMC with powerful insight and deep historical knowledge to ensure that the first peoples of Alaska are not subjected to further indiscrete modes of deprivation and inequitable treatment by the federal government, which must honor its nation-to-nation relationship with tribes.

May 24, 2023

Mr. Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 West Third Avenue, # 400
Anchorage, AK 99501

Chairman Kinneen and Members of the Council,

We write to you today in support of the Local Knowledge, Traditional Knowledge and Subsistence (LKTKS) Protocol. Thank you for the opportunity to offer public comment on this important matter. We urge the North Pacific Fishery Management Council (Council) to adopt the Protocol developed by the LKTKS Taskforce, and to initiate a process for implementation of the associated onramps for incorporating LKTKS information into the Council's decision-making process. Taking this action constitutes a critical step forward in improving the management of fisheries in the Bering Sea and advances multiple stated objectives of the Council.

The Pew Charitable Trusts has supported efforts to advance the incorporation of Traditional Knowledge in fisheries management since the Council initiated development of the Bering Sea Fishery Ecosystem Plan (BSFEP) in December 2015. Since that time, our engagement has included attendance and participation in BSFEP Plan Team and LKTKS Taskforce meetings, providing public testimony at Ecosystem Committee and Council meetings, supporting peer-reviewed publications¹, and supporting the participation of Tribal organizations in the Council process. With adoption of the LKTKS Protocol, along with a commitment to implement the associated onramps, the Council will have achieved a significant milestone in its work to advance ecosystem-based fishery management (EBFM) in the Bering Sea.

Improving Fishery Management and Utilizing Best Available Science

Establishing a consistent and formal protocol and process for incorporating Traditional Knowledge into the Council's decision-making will help to improve the management of federal fisheries in the Bering Sea. This region of the North Pacific is currently experiencing rapid and extreme ecological changes due to climate change that have become increasingly difficult to forecast, including marine heat waves, reduced productivity, and shifts in the marine food web that are impacting both managed and unmanaged fish species, marine mammals, and the

¹ Raymond-Yakoubian, Julie & Raymond-Yakoubian, Brenden & Moncrieff, Catherine. (2017). The incorporation of traditional knowledge into Alaska federal fisheries management. *Marine Policy*. 78. 132-142. 10.1016/j.marpol.2016.12.024. & Wiese, F.K.; Nelson, R.J. Pathways between Climate, Fish, Fisheries, and Management: A Conceptual Integrated Ecosystem Management Approach. *J. Mar. Sci. Eng.* 2022, 10, 338. <https://doi.org/10.3390/jmse10030338>

communities that depend upon a healthy and functioning marine ecosystem.² As noted in the Protocol, there is a growing concern that western science is not able to “keep pace” with the rapid changes occurring the Bering Sea and the associated impacts on subsistence communities and traditional ways-of-life³; and that there is a need to better incorporate alternative ways of knowing and understanding the marine environment.⁴ Adopting the LKTKS Protocol and implementing the associated onramps constitutes a major step forward in addressing this stated need.

Adoption of the LKTKS Protocol also enables the Council to better meet its obligations under National Standard 2 of the Magnuson-Stevens Fishery Conservation and Management Act, which requires Councils to base decisions on the best scientific information available.⁵ There is increasing acknowledgement in recent scientific literature that the best scientific information available includes not only western science, but also the knowledge and experience of people living in and depending upon the marine ecosystem.⁶ As stated in the Protocol, such information can help advance understanding of “fluctuations in species abundance, location, spawning areas, migrations, ocean currents, sea ice, and much more.”⁷ By taking action to adopt the LKTKS Protocol and implement the identified onramps, the Council can help ensure that the information utilized to conduct analyses and provide rationale and justification for its fishery management decisions is based upon the best available science.

Advancing Council Goals and Objectives

Adoption of the LKTKS Protocol also helps to achieve several stated Council goals and objectives. The BSFEP lays out a set of objectives intended to help the Council make progress toward achieving its 6 Alaska-wide overarching Ecosystem Goals.⁸ These include objectives related to decision-making processes, ecosystem objectives that provide targets for management, and research objectives used to initiate specific actions to further the Council’s broader Ecosystem Goals. Of these, the LKTKS Protocol helps achieve the following objectives:

² Reum, J. C., Blanchard, J. L., Holsman, K. K., Aydin, K., Hollowed, A. B., Hermann, A. J., ... & Punt, A. E. (2020). Ensemble projections of future climate change impacts on the Eastern Bering Sea food web using a multispecies size spectrum model. *Frontiers in Marine Science*, 7, 124.

³ Christie, K. S., Hollmen, T.E., Huntington, H.P., & Lovvorn, J.R. (2018). Structured decision analysis informed by traditional ecological knowledge as a tool to strengthen subsistence systems in a changing Arctic. *Ecology and Society*, 23(4).

⁴ Hosen, N., Nakamura, H., & Hamzah, A. (2020). Adaptation to climate change: Does traditional ecological knowledge hold the key? *Sustainability*, 12(2), 676.

⁵ 50 CFR § 600.315

⁶ Thompson, K. L., Lantz, T., & Ban, N. (2020). A review of Indigenous knowledge and participation in environmental monitoring. *Ecology and Society*, 25(2).

⁷ North Pacific Fishery Management Council (NPFMC). 2023. Protocol for Identifying, Analyzing, and Incorporating Local Knowledge, Traditional Knowledge, and Subsistence Information into the North Pacific Fishery Management Council’s Decision-making Process in the Bering Sea. 1007 W. 3rd Ave, Anchorage, AK. p. 6

⁸ North Pacific Fishery Management Council (NPFMC). 2019. Bering Sea fishery ecosystem plan. 1007 W. 3rd Ave, Anchorage, AK. p. 20

- BSFEP Process Objective #5 - Improve incorporation of local knowledge and traditional knowledge in Council management for the Bering Sea ecosystem.
- BSFEP Process Objective #6 - Facilitate and organize communication of ecosystem science, Local Knowledge, Traditional Knowledge, and relevant Council policy between scientists, communities, and decision makers.
- BSFEP Research Objective #2 -Develop processes to guide the use of subsistence data, local knowledge, and traditional knowledge information from the Bering Sea in the Council process.

In 2004, finalization of the NPFMC’s Groundfish Programmatic Supplemental Environmental Impact Statement (PSEIS) led to establishment of the Council’s current Groundfish Management Policy. This policy includes nine management goals, one of which is to “Increase Alaska Native Consultation.” The three objectives listed below are aimed at achieving that specific goal, and will greatly be advanced through adoption of the LKTKS Protocol:

- Groundfish Management Objective #35: Continue to incorporate local and traditional knowledge in fishery management.
- Groundfish Management Objective #36: Consider ways to enhance collection of local and traditional knowledge from communities, and incorporate such knowledge in fishery management where appropriate.
- Groundfish Management Objective #37: Increase Alaska Native participation and consultation in fishery management.

Additional Suggestions for Council Consideration

In addition to adopting the LKTKS Protocol, we urge the Council to consider how the protocols could be applied outside of the Bering Sea; in particular the Gulf of Alaska. As an Action Module under the BSFEP, we acknowledge that the scope and intent of the LKTKS Protocol is specific to federal fisheries management in the Bering Sea. However, as there are Traditional Knowledge holders and subsistence-based communities throughout Alaska, the best practices, suggested actions, and management onramps should have value outside of just the Bering Sea and could greatly benefit the Council’s decision-making process for the Gulf of Alaska, Aleutian Islands and the Arctic.

Second, we support the Taskforce recommendation to consider making time in its future workload planning to conduct a 5-year review of the LKTKS Protocol. Such a review would provide the Council with an opportunity to take a retrospective look at the extent to which the LKTKS Protocol has been implemented and whether it has been effective at achieving its purpose and need. As part of a review, the Council could also consider whether any changes or improvements to the LKTKS Protocol are needed to best achieve the goals and objectives discussed above.

Conclusion

We greatly appreciate the Council's commitment to improving the incorporation of LKTKS information into the fishery management process, and express our gratitude to the Taskforce members and Council staff for their work over the last 4 years to develop the Protocol under consideration. We urge the Council to adopt the LKTKS Protocol, and we look forward to continuing to work with the Council to maintain healthy oceans and sustainable fisheries.

Thank you in advance for you time and consideration of these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Steve Marx".

Steve Marx
Senior Officer
The Pew Charitable Trusts
smarx@pewtrusts.org

BRISTOL BAY NATIVE ASSOCIATION

**P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257**

May 25, 2023

Aleknagik

Chignik Bay

Chignik Lagoon

Chignik Lake

Clarks Point

Curyung

Egegik

Ekuk

Ekwok

Igiugig

Iliamna

Ivanof Bay

Kanatak

King Salmon

Kokhanok

Koliganek

Levelock

Manokotak

Naknek

New Stuyahok

Newhalen

Nondalton

Pedro Bay

Perryville

Pilot Point

Port Heiden

Portage Creek

South Naknek

Togiak

Twin Hills

Ugashik

Natural Resources Department
Qayassiq Walrus Commission
Moses Toyukak Sr, Chairman

Simon Kinneen (NPFMC Chair) and David Witherell (NPFMC Executive Director)
Dr. Kate Haapala and Dr. Sarah Wise (NPFMC LKTKS Taskforce Co-Chairs)
1007 W. Third Ave, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501-2252

Submitted via NPFMC portal at: <https://meetings.npfmc.org/Meeting/Details/2991>

Re: Call for Comments for LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members,

Qayassiq Walrus Commission (QWC) is writing to provide comment on the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the NPFMC's LKTKS Taskforce. Bristol Bay Native Association (BBNA) is the non-profit Tribal Consortium for the 31 federally recognized Tribes of the Bristol Bay region.

BBNA strongly commends the work of the Taskforce, and we applaud the Council's prioritization of this Action Module of the Bering Sea Fishery Ecosystem Plan (BS FEP). We believe the LKTKS Protocol and Onramp recommendations document is excellent and these recommendations do not need to undergo any substantial revisions during the upcoming final Taskforce meeting and the NPFMC October 2023 meeting.

Additionally, at the upcoming October 2023 meeting, we request that the Council fully support and adopt the Protocol, begin implementation, and lay out a strategy for complete implementation of the Onramp recommendations as well. We recognize the Council may choose to implement only some of the onramps initially. QWC believe that strategically planning to implement all recommendations, will improve the Council process for Tribes, stakeholders, and the general public; will support the Council's Ecosystem Policy and the goals outlined in the BS FEP; significantly advances Council and Agency goals related to meeting various National Standard mandates - including National Standard 2 with regard to the use of the best scientific information available; and is in alignment with goals, mandates, and guidance related to TK; diversity, equity, inclusivity, and environmental justice; Tribal Consultation; and Ecosystem-Based Fishery Management (EBFM).

BRISTOL BAY NATIVE ASSOCIATION

P.O. BOX 310
DILLINGHAM, ALASKA 99576
PHONE (907) 842-5257



- Aleknagik*
- Chignik Bay*
- Chignik Lagoon*
- Chignik Lake*
- Clarks Point*
- Curyung*
- Egegik*
- Ekuk*
- Ekwok*
- Igiugig*
- Iliamna*
- Ivanof Bay*
- Kanatak*
- King Salmon*
- Kokhanok*
- Koliganek*
- Levelock*
- Manokotak*
- Naknek*
- New Stuyahok*
- Newhalen*
- Nondalton*
- Pedro Bay*
- Perryville*
- Pilot Point*
- Port Heiden*
- Portage Creek*
- South Naknek*
- Togiak*
- Twin Hills*
- Ugashik*

The Protocol provides a framework covering the appropriate and necessary scope related to this topic. Which included discussion, definition of terms and concepts which is a useful basis for understanding, respecting, appreciating, and engaging with various knowledges and knowledge systems. The Protocol also includes reflections on challenges related to implementing the Council's goals related to LK, TK, and subsistence information, and provides guidelines for moving this work forward. The eight Guidelines included in the Protocol provide guidance and associated recommendations to the Council, having the opportunity to equitably incorporate multiple knowledge systems into its processes and outcomes. Some of the many important elements of this work include: the paramount importance of respect (Guideline 1), insight into accurately identifying knowledge and knowledge holders (Guideline 3), the importance of building capacity (Guideline 7), and information about navigating multiple knowledge systems (Guideline 8). The 11 onramp recommendations were carefully developed to assist the Council in implementing the Protocol and Guidelines, and addresses areas that need attention such as Tribal Consultation, engagement and staff capacity.

In addition to the Protocol and Onramps documents, the Taskforce also created other products of great value, including the LKTKS Search Engine and the analytical template for staff. This Taskforce's process can be seen as an exemplary model, built upon the transparent and inclusive BS FEP process. The work of this Taskforce, brought together LK, TK and Tribal experts, scientists (including social scientists with TK expertise), Council and Agency staff. All of this speaks to what may be the Council's most intentionally-developed collaborative cross-cultural product and its most significant activity to-date in terms of ensuring robust inclusion of Tribal perspectives in the Council process. What the Taskforce has produced is impressive and of national significance.

If adopted and implemented, the LKTKS Protocol and Onramp recommendations will improve Council analyses and decision-making; will result in a more equitable, inclusive, and robust process including and particularly with regard to Alaska Native Tribal knowledge and voices; and will result in better outcome for communities, marine ecosystems, and fisheries. Again, we strongly recommend the Taskforce and Council move forward towards full adoption and implementation of the LKTKS products as they are now without any substantial changes.

Sincerely,

Moses Toyukak Sr., QWC Chairman

ROSE FOSDICK

Box 1485, Nome, AK 99762 | 907-443-5305 | rose.atuk7@gmail.com

June 1, 2023

LKTKS Taskforce and
North Pacific Fishery Management Council

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell,
and Council members

On my own behalf, I am writing in support of the recently submitted "Local Knowledge
Traditional Knowledge Subsistence (LKTKS) Protocol and Onramp" document presented by the
LKTKS Taskforce.

The LKTKS Taskforce members and staff have expended time, held lengthy discussions and
carefully considered the protocol and onramp options for several years and their progress was
shared among the Council's committees. The end product is very well done, and I commend the
efforts of all involved.

I encourage the Council to accept the LKTKS protocol and onramp document, as written. When
accepted then the process and options presented can begin to move forward so that knowledges
that are ever present and always amended in a changing environment can be recognized and used
in decision making.

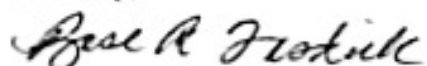
Alaska Native tribes and tribal members have a vast knowledge of the ecosystem and that
knowledge should be used in NPFMC decision making because it is valuable and useful.
Obtaining and using traditional knowledge, on topics being considered in the Council process,
will lead to better decision making and that knowledge is considered "best available scientific
information".

I support the LK, TK, and subsistence information onramp recommendations, and especially
highlight one which recommends the Council to initiate a process whereby Tribes could engage
directly with the Council. Option 1 appears reasonable and doable. Another recommendation
suggests Council modify the Council statement of organization practices and procedures
(SOPPs) and terms of reference (TOR) for advisory bodies to include specific language to add
designated Alaska Native tribal seats to be held by tribal representatives.

Another recommendation is the Council solicit nominations for expanded LK and TK social
science expertise on the Science and Statistical Committee (SSC) and I believe that is very well
needed and would round out and fill in information and data presented in scientific research
reports.

Again, I appreciate the efforts of the LTKS task force for holding many discussions and for drafting these options for consideration. I believe using the protocol and onramp recommendations can result in broader information for the decision-making process of fishery management. I encourage the task force to be relied upon to provide additional details as needed to activate the process in the future.

Sincerely,

A handwritten signature in cursive script that reads "Rose R Fosdick".

Rose Fosdick



May 24, 2023

Simon Kinneen, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Jon Kurland, Regional Director
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

Re: Local Knowledge, Traditional Knowledge, and Subsistence Protocol Recommendations

Dear Chairman Kinneen, Director Kurland, and Council Members,


SalmonState submits these comments in support of the Local Knowledge, Traditional Knowledge, and Subsistence Protocol developed by the LKTKS Taskforce and presented to the North Pacific Fishery Management Council.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a Salmon State by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

The Protocol was developed through an inclusive and collaborative process and has resulted in informed guidance for incorporation of traditional knowledge, local knowledge, and subsistence information in federal fisheries management. In particular, the Alaska Native representation in the development of the Protocol has been severely lacking in the Council decision processes, and implementation of the Protocol's framework for incorporating traditional and local knowledge through respect, identifying, and including Alaska Native and community members who hold knowledge is necessary to guide the Council and NMFS in more equitable and informed decision-making.

SalmonState requests NPFMC adopt and implement the Local Knowledge, Traditional Knowledge, and Subsistence Protocol without delay at the October 2023. Implementation of the Protocol is imperative to establishing more equity and more informed decisions by the Council and NMFS in the North Pacific federal fisheries management region. Thank you for your prompt attention and decision on this matter. Thank you for providing the opportunity to comment on this important issue in front of the Council and NMFS.

Sincerely,


Loretta Brown, Legal and Policy Analyst
loretta@salmonstate.org

May 31, 2023

Simon Kinneen, NPFMC Chair
David Witherell, NPFMC Executive Director
Dr. Kate Haapala and Dr. Sarah Wise, NPFMC LKTKS Taskforce Co-Chairs
1007 W. Third Ave, Suite 400
L92 Building, 4th Floor
Anchorage, AK 99501-2252

Submitted via NPFMC portal at: <https://meetings.npfmc.org/Meeting/Details/2991>

Re: Supporting LKTKS Protocol and Onramp Recommendations

Dear Dr. Haapala, Dr. Wise, LKTKS Taskforce members, Chair Kinneen, Director Witherell, and Council members,

Tanana Chiefs Conference (TCC) represents the Interior Alaska 42 communities, including 37 federally recognized Tribes, where 34 are located along the Yukon River drainage. TCC fully supports the Local Knowledge, Traditional Knowledge, and Subsistence (LKTKS) Protocol and Onramp documents prepared by the North Pacific Fisheries Management Council (NPFMC) LKTKS Taskforce. We request the Council to fully support and adopt the Protocol, and fully support, begin implementation, and lay out a strategy for complete implementation of the Onramp recommendations.

In 2013, TCC Full Board of Directors passed Resolution No. 2013-19 stating,

“In the Traditional Athabascan religion there continues to be a strong connection between the Athabascan people and the animals of our indigenous lands and waters. This connection goes beyond needing such animals for food security, but the relationship is necessary to carry on spiritual, cultural, and social well-being of our people.”

TCC recognizes that this Protocol is specific to the Bering Sea region, we emphasize that our Tribes have been stewarding salmon spawning and rearing habitat in a region that is just slightly smaller than the size of Texas since time immemorial. In fact, the Upward Sun River site along the Tanana River reveals the earliest known (11,500 year old) human use of salmon in North America.¹

TCC recognizes “the Bering Sea is undergoing major ecological and climatological shifts that are increasingly extreme and difficult to accurately predict,” as mentioned in the Protocol, and affirm we are also concerned “that western scientific methods of observation and study cannot

¹ See Carrin M. Halfman, et al, *Early human use of anadromous salmon in North America at 11,500 y ago*, 112 Proceedings of the National Academy of Sciences 12344 (2015), available at: <https://www.pnas.org/doi/10.1073/pnas.1509747112#:~:text=Fish%20bones%20from%20the%2011%2C500,salmon%20fishing%20in%20North%20America.>

keep pace with on-the-ground changes; and the current period of environmental changes is greatly impacting subsistence harvests and traditions.” For these reasons, it is dire the Council incorporate Local and Traditional perspectives beyond western knowledge systems, as Local and Traditional Knowledge holders are often first to witness changes to the ecosystem.

Furthermore, we commend the Taskforce’s work and believe the process is an exemplary model worth national significance. Setting the precedence for the Protocol, Guideline 1 emphasizes respect for Local and Traditional Knowledge systems. As TCC’s guiding principle, *Ch’eghwtsen’* refers to pure unselfish love that extends to everything, including the ecosystem. As part of demonstrating respect and *Ch’eghwtsen’*, both require recognition that culturally differing values exist and impact decision-making, and acknowledging differences with respect broadens perspectives and is highly informative. Therefore, the Council should consider the challenges reflected in Guideline 8 as a natural outcome that presents opportunities for the Council to broaden its scope of the best scientific information available to their decision-making process, per Magnuson-Stevens Act National Standard 2.

In sum, TCC stresses this broader perspective is crucial as conservation management measures may not be sufficient enough to prevent overfishing in the wake of dramatic ecological and climactic shifts. The 11 Onramp recommendations provide the Council with conduits to broaden their perspective and awareness, foster meaningful relationships with Local and Traditional Knowledge holders, and nurture vitality for the entire regional fishery.

TCC urges the Taskforce and Council to fully adopt and implement the LKTKS Protocol and Onramp Recommendations as they are written without substantial changes. TCC applauds the Taskforce for their commitment and work, as well as the Council for its prioritization of incorporating Local Knowledge, Traditional Knowledge, and Subsistence information to the Bering Sea Fisheries Ecosystem Plan.

Thank you,
TANANA CHIEFS CONFERENCE



Brian Ridley, Chief/Chairman

Toby Anungazuk Jr.
self
06/02/2023 03:32 PM AKDT

RE: Please leave all comments on the Protocol and onramp recommendations here.

Date: June 2, 2023 To: North Pacific Fishery Management Council From: Toby M Anungazuk Jr Subject: Comments on the LKTKS Protocol and Onramps documents North Pacific Council members, My name is Toby Anungazuk Jr and I have lived in Golovin Alaska Since September 2002. I am a tribal member of the Native Village of Wales, and could claim TKLKS at Wales for 47 years, and can claim some TKLK in the Golovin area from September 2002 to present. I have subsistence fished at Kitchavik River all since then. I will be 68 years of age next month. I have over twenty years of fishing the Kitchavik River. My traditional knowledge teacher during fish drying season included Agnes Amarak, Florence (Nuz) Doyle, Sig & Irene Aukongak - they have all passed on - they mentioned many local and area legends, the timing of when to expect salmon into Kitchavik River, where and when they fished at Kitchavik. Other Elders who passed on and some that told stories included Thomas Punguk, Gabriel Amaktoolik, Bobby Amarak, Denny Amarak, Howard Lincoln from Wt Mountain 18 miles from Golovin. I am still learning, especially now with climate change. I learned from many families and have learned most of the legends in an around that area. I learned most of my TKLK by the Elders of Wales Alaska where I lived most of my life, Wales is situated at the most Northern reaches of the Bering sea. My TK were mostly the Men of Wales, the men learned the Northern Bering Sea before there was outboard motors, their instructors learned how to gather before there was firearms, George Ootenna was the eldest man, he was already an accomplished hunter before the firearms got to Wales. I am writing to encourage you to adopt the Protocol and Onramps documents created by the Local Knowledge, Traditional Knowledge and Subsistence Taskforce. This Protocol is particularly important to Golovin and the other Bering Sea because we realize how important it is to have a method to comment on all or most aspects of our fishing, and being able to continue our way in a traditional lifestyle. We want our voices to be heard in federal fisheries management We want our Traditional Knowledge to be included in fisheries management We want to ensure the health and sustainability of the Bering Sea ecosystem and these protocols will result in the better and more comprehensive incorporation of our knowledge and concerns, which can significantly contribute to ecosystem based fisheries management Additionally, The Taskforce included robust representation from western Alaska Tribes and Tribal organizations, including Tribal members and Elders The Taskforce used an transparent and inclusive public process We believe the guidelines in the Protocol, if implemented across the NPFMC process, will improve decision-making, move the NPFMC towards a more equitable process, and lead to better outcomes for our fisheries and ecosystem I especially like Protocol guideline where you can use traditional knowledge in our comments that can ensure our way of life, You can find the guidelines in the Protocol document here: <https://meetings.npfmc.org/Meeting/Details/2991>). We ask the NPFMC to adopt the LKTKS Protocol in its entirety, along with the Onramps document, and to immediately begin implementation of both. By this email, consider that my testimony is signed. Thank you, _____
Toby Anungazuk Jr Tribal Member of the Native Village of Wales, residing in Golovin since September 2002



Dt: May 30, 2023
To: Simon Kinneen
Chairman, North Pacific Fishery Management Council
Fr: Native Village of Unalakleet Tribal Council
Re: NPFMC Adoption of the LKTKS Protocol

Dear Chairman Kinneen and NPFMC members,

The Native Village of Unalakleet is the Tribal governing body representing our Tribal members and assisting them in strengthening and preserving the social, economic, educational and cultural well-being of the Native people of Unalakleet.

Our community is invested in the long-term health and sustainability of the lands and waters around us. We have stewarded these lands and waters for generations and across millennia and they, in turn, have provided nutritional, spiritual, economic, and other support to our people. Our Tribal members are keenly interested in the actions and decisions of the NPFMC and are writing to ask that you adopt the Protocol and Onramps documents created by the Local Knowledge, Traditional Knowledge and Subsistence (LKTKS) Taskforce as-written, without any substantial changes.

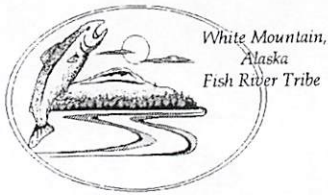
It is our belief that your adoption of the LKTKS Protocol and the associated on-ramps can lead to significant and long-needed improvements that will raise up Tribal voices in federal fisheries management and will enable deeper understandings of the many ways our Traditional Knowledge and knowledge-holders can contribute to the management and stewardship of the Bering Sea. We want our Traditional Knowledge recognized and used the same way that Western Science is. Traditional Knowledge is part of the 'best scientific information available' and should be treated as such in NPFMC processes.

We appreciate the work of the Taskforce over several years and acknowledge that the Taskforce included multiple Tribal citizens and staff at Tribal organizations. The Native Village of Unalakleet supports the Protocol as well as the associated on-ramps. We are particularly pleased to see the many on-ramp recommendations that will help implement the Protocol, such as: expanding the designated Alaska Native Tribal seats to be held by Tribal representatives across NPFMC advisory bodies.

We would like the NPFMC to adopt the LKTKS Protocol in its entirety, along with its on-ramps, without any substantive changes. We would like to see the Protocol Guidelines become NPFMC policy and for the NPFMC to begin immediate implementation of the Protocol and on-ramps.

Sincerely,

Frank Katchatag
President



Native Village of White Mountain
P.O. Box 84090
White Mountain, AK 99784
TELEPHONE: (907) 638-3651 FAX (907) 638-3652

Date: May 25, 2023

To: North Pacific Fishery Management Council

From: NATIVE VILLAGE OF WHITE MOUNTAIN TRIBAL COUNCIL

Subject: Comments on the LKTKS Protocol and Onramps documents

North Pacific Council members,

Our Tribal government is writing to encourage you to adopt the Protocol and Onramps documents created by the Local Knowledge, Traditional Knowledge and Subsistence Taskforce. This Protocol is particularly important to our Tribe because:

- We want our voices to be heard in federal fisheries management
- We want our Traditional Knowledge to be included in fisheries management
- We want to ensure the health and sustainability of the Bering Sea ecosystem and these protocols will result in the better and more comprehensive incorporation of our knowledge and concerns, which can significantly contribute to ecosystem based fisheries management

Additionally,

- The Taskforce included robust representation from western Alaska Tribes and Tribal organizations, including Tribal members and Elders
- The Taskforce used an transparent and inclusive public process
- We believe the guidelines in the Protocol, if implemented across the NPFMC process, will improve decision-making, move the NPFMC towards a more equitable process, and lead to better outcomes for our fisheries and ecosystem

We ask the NPFMC to adopt the LKTKS Protocol in its entirety, along with the Onramps document, and to immediately begin implementation of both.

Thank you,

A handwritten signature in blue ink, appearing to read "m g d c", is written over the "Thank you," text.

Mary D. Charles
President, Native Village of White Mountain