

PEIS Discussion Framework for Ecosystem Committee

The Council and staff are seeking input on development of a purpose and need and alternatives for the Programmatic EIS. Ideas are welcome and may be provided in any format, however, the questions below aim to help frame the work on the Programmatic and assist the Committee in developing a purpose and need statement and identification of alternatives. The [staff discussion document](#) should provide you context for answering the following questions. *(Please note that page 1 of the discussion document contains the same questions that are on this form.)*

Any answers are, by no means, meant to be final, and the purpose of the questions is to help organize thoughts and to stimulate discussion at the April 2023 Committee meeting. Staff will organize and compile these answers for Committee discussion.

You do not need to answer every question and you have the option to go back and change your responses after submitting the form. You can also submit more than one response to this form.

Please submit your response(s) no later than Monday, March 27th.

Please enter your name in the space below. *

Brenden Raymond-Yakoubian

If applicable, please enter your organization or affiliation in the space below.

Kawerak, Inc.

1. Why does the Council need to reinitiate a Programmatic evaluation at this time?

There have been considerable environmental changes over the past two decades and the rate, unpredictability, and significance of changes do not seem to be slowing down. There have also been significant changes in understanding and approach to fishery management and related science in this period leading to substantial work on EBFM and consideration of the need for epistemic and processual changes to address historical deficits in consideration of Alaska Native communities, their knowledge, and their participation in the management process. All of this calls for a thorough-going evaluation of the fundamental frameworks used to manage the entire offshore federal fishery in a way which structurally builds-in these core considerations (e.g. climate readiness, ecosystem and community sustainability, knowledge diversity, equity, etc.).

2. What outcome(s) do you want to achieve through this process?

As noted in response to question 1, we would like to see a fundamental evolution of the frameworks structuring Alaska federal fishery management to bring them in line with radically-changed environmental realities and processual and epistemic understandings and approaches to management (e.g. advances in EBFM, the need for climate readiness, the importance of and interconnections between ecosystem and community sustainability, the need for knowledge diversity, the imperative for equity, etc.). We also want to see, relatedly, significant movement towards collaborative approaches to management with Tribes and Tribal entities, and co-production of knowledge in the scientific and analytical process associated with fisheries management.

3. What scope would you like to see for the new policy?

- *Focused on groundfish fishery, specific species, or all Council-managed fisheries?*
- *A broader or specific geographic range?*
- *Affecting all the management policy or specific components?*

We would like to see a broader examination of the way all of the Council-managed fisheries are understood and managed in light of: the highly-changed current and projected ecosystem characteristics; the diversity of values, knowledge, needs, and stewardship practices which exist that have relevance to the marine ecosystem and the engagement of fishery resources within it; and the epistemic, processual and management advances the Alaska federal fishery management system has made and recognizes needs to be made.

Additionally, and related to this, we hope to see a broadening of our conceptualizations of economic, social, and ecological considerations (and management in light of that) such that they are not seen simply or primarily in terms of being the secondary considerations by which the process simply reduces yet maintains a primary concern on commerce/profit. While the environment and communities and their livelihoods are indeed things that can be impacted, and risks to them must be considered, accounted for, and addressed, we also need to add into our focus the concepts of well-being and holistic stewardship grounded in principles of respect, sharing, not wasting, and reciprocity - thereby striving to prioritize the sustainable, equitable and integrated well-being of communities, ecosystems, and economies broadly considered.

4. What changes would you like to see to the current groundfish management policy and its nine goals and suite of 45 objectives?

The goals and objectives can be found [here](#).

- *Do you feel there are any management goals and/or objectives that need to be added to a new management policy? If so, what are they?*
- *Are there any management goals and/or objectives that have not been prioritized enough in Council decision making? If so, which ones?*
- *Are there any management goals and/or objectives with which you no longer agree, or which need language to be updated? If so, which ones?*

A good question for the Council and Agency to ask themselves is whether and how they have made progress with regard to achieving that which is laid out in these goals and objectives. There has been insufficient progress, or progress only very recently, for many of these items (and much of it has required extraordinary effort on the part of those historically outside the Council process to bring to fruition) - such as with regard to addressing the social, economic, and environmental considerations which are supposed to be accounted for in crafting optimum yield, ensuring sustainable opportunities for subsistence are provided for, ensuring fair and equitable allocation of resources, having a robust system for adjusting catch levels in light of uncertainty and ecosystem factors, incorporating ecosystem-based considerations into fishery management decisions, sufficiently reducing bycatch and waste, engaging Tribes in habitat considerations, collecting and incorporating TK into fishery management, integrating Tribal Consultation into federal fishery management, and ensuring Tribal research priorities are adequately accounted for in Council research priority-setting which may be related to cooperation with research institutions regarding addressing pressing fishery issues.

In addition to contemplating changes which result from such a reflexive analysis, it also seems clear that there should be some build-out of these goals and objectives. For example, it seems like there should be an overall goal which speaks to managing in light of actual, and changing, conditions (fishery, ecosystem, community). This is a significant and unmet need at a number of levels, including climate readiness, integrating social considerations into fishery decision-making, managing for particular requirements in light of actual conditions (e.g. bycatch in light of existing stock status of indirectly-impacted species), and so on. There is a need for fishery management that is structurally ready, flexible, responsive, adaptable, sustainable, collaborative, diversely informed, and equitable.

5. Are there any specific regulatory or management-related steps you can think of at this time to better align the Council with future purpose and management objectives?

These may not necessarily end up being folded into the Programmatic, but can provide additional illustration as the Committee and Council decide how to structure alternatives.

In addition to what has been noted in our other responses, some others can be mentioned here, including: ensuring Tribal representation on all Council bodies; ensuring sufficient social science capacity is in place on Council bodies, Council staff, and at the AFSC; a robust system for integrating LK, TK, and subsistence information, including for both short (e.g. rapid) and long term management actions; and requiring incorporation of Tribal Consultation information into Council analyses and decision-making processes before final action.

6. Additional Comments

If you have any additional comments you would like to share, please use the space below.

The process for a new Programmatic should be robustly collaborative with Tribal entities, including in terms of outreach, engagement, and Consultation (including the crafting of the kind and manner in which those activities are undertaken, so as to maximize the meaningful participation of Tribal entities and their voices in this process and its outcomes).

A new Programmatic should build on the progress made with regard to EBFM and Tribal involvement in the federal fishery management process. This includes, for example, fully implementing the recommendations of the LKTKS Taskforce and the Community Engagement Committee, as well as continued implementation of the vision of the Bering Sea FEP. A new Programmatic should also point towards ways to address existing deficits in Council and NMFS management, e.g. lack of resources and attention regarding climate readiness, chronic problems related to Tribal Consultation as pertains to the Agency-Council nexus, insufficient inputs of Tribal information across all agenda items, and insufficient inclusion of Tribal voices in all Council bodies and processes.

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