



May 5th, 2023
Bill Tweit, Chair Ecosystem Committee
North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
L92 Building, 4th Floor
Anchorage, Alaska 99501

Dear Chair Tweit and members of the Ecosystem Committee:

RE: Draft Purpose and Need and alternatives for a Programmatic Environmental Impact Statement (PEIS)

The Aleut Community of St. Paul Island (ACSPI), a federally recognized Indian Tribe located on the Pribilof Islands, Alaska, is pleased for the opportunity to submit our comment to the Ecosystem Committee regarding the draft Purpose and Needs and alternatives for the PEIS. Unangaġ (Aleut) communities on the Pribilof Islands of St. Paul and St. George are directly experiencing a rapidly transforming marine ecosystem. We live at the center of the Bering Sea, and our marine ecosystem supports many of the fisheries. We are not the cause of these changes, but face real costs to wildlife, human and ecosystem health, local economies, our qaqamiigūġ (subsistence) way of life, and the burden of conservation. The Pribilof Islands are home to the largest breeding population of Laaquadan or known as Northern Fur Seals or known as Laaquadan, are recognized as kin to the Unangan and are integral to cultural events, traditional foods, and ceremony. Since the 1970s, the Laaquadan Bering Sea population has dropped by around 70% and evidence leads to insufficient prey nutrition and consumption.^{1,2} Our fishermen have documented smaller size and changing distributions of chagiġ or known as halibut.³ Die-offs of seabirds in the Alaska have occurred with increased frequency since 2015 and St. Paul has experienced multiple mortality events that is linked to starvation.⁴ The 2022/2023 Bering Sea snow crab fishery closures have caused major economic loss for our community and has jeopardized essential services.⁵

We appreciate the work put in to the PEIS thus far by the Ecosystem Committee and Council staff. As stated in the background reference document for this agenda item, the 2004 PEIS management

¹ McHuron, E. A., Luxa, K., Pelland, N. A., Holsman, K., Ream, R., Zeppelin, T., and Sterling, J. T. (2020). Practical Application of a Bioenergetic Model to Inform Management of a Declining Fur Seal Population and Their Commercially Important Prey. *Frontiers in Marine Science*, 7, 1. <https://doi.org/10.3389/fmars.2020.597973>

² Short, J.W.; Geiger, H.J.; Fritz, L.W.; Warrenchuk, J.J. (2021). First-Year Survival of Northern Fur Seals (*Callorhinus ursinus*) Can Be Explained by Pollock (*Gadus chalcogrammus*) Catches in the Eastern Bering Sea. *Journal Marine Science and Engineering*. 9, 975. <https://doi.org/10.3390/jmse9090975>

³ Tran and Divine. 2021. "Community connections to chagiġ(Pacific halibut, *Hippoglossus stenolepis*) and other marine resources on St. Paul Island, Alaska" Report to the North Pacific Fishery Management Council, March 2021. 14 pp

⁴ Jones, T., Divine, L. M., Renner, H., Knowles, S., Lefebvre, K. A., Burgess, H. K., Wright, C., Parrish, J. K. (2019). Unusual mortality of Tufted puffins (*Fratercula cirrhata*) in the eastern Bering Sea. *PLOS ONE*, 14(5), e0216532. <https://doi.org/10.1371/journal.pone.0216532>

⁵ Nelson, M. (2023, January 19). *Bering Sea Crab Crash Jeopardizes St. Paul Island's emergency medical services*. KTOO. Retrieved May 2, 2023, from <https://www.ktoo.org/2023/01/19/bering-sea-crab-crash-jeopardizes-st-paul-islands-emergency-medical-services/>

framework is no longer suitable to the current state of the Federal Fishery Management Programs in the Alaskan Exclusive Economic Zone (EEZ). The current PEIS does not address the rapidly changing marine ecosystem and is not inclusive to the voices of Alaska Native tribes and tribal entities. We believe that a new comprehensive NEPA analysis can help address these deficiencies and help guide the Council's continued movement toward Ecosystem Based Fisheries Management (EBFM). Outcomes of the PEIS process should result in meaningful management changes which are responsive to the overarching management policy. While climate change may be a major driver of these impacts, that does not neglect the NPFMC's role and responsibility to manage the effects of human behavior in Alaska's fisheries management. Analysis should consider both individual and cumulative effects of all federal fishery management programs in the Alaska EEZ.

Expanding the PEIS scope towards Ecosystem Based Fisheries Management (EBFM)

The new PEIS policy is an opportunity to expand the original scope beyond guiding the groundfish fisheries (fishery management plans) but should also consider the Council's management framework across all its managed fisheries, including bycatch and prohibited species catch. It must develop accountability and evaluation processes for the current PEIS's objectives and goals to meet its outcomes effectively. The analysis should consider and identify potential conservation benefits, including habitat protections and through improved fishery practices. The scope should extend to include socio-ecologically important species such as crab, salmon and other key predator/prey species associated with groundfish fisheries. Such as forage fish, squid, seabirds, and marine mammals etc. Also, to consider opportunities or challenges for small boat, rural communities to maintain viable fisheries and entry level participation in federal fisheries must be considered. Advocacy should result in actions implemented by the Council, not just policies.

The large marine ecosystems in the North Pacific are a connected and a new comprehensive National Environmental Policy Act (NEPA) analysis can help address these deficiencies and help guide the Council's continued movement toward EBFM. The Essential Fish Habitats provisions of Alaska FMPs and PEIS should complement each other to update and guide the NPFMC. Emphasis in protecting vital habitats, utilize new and best available science information, update fishing effects information, address conservation recommendation for non-fishing activities. Climate related impacts to non-target species can have differential impacts on fishery participants, gear groups, subsistence resources can have dramatic impacts to the cultures, economies, and communities of Alaska's Indigenous peoples.

Additionally, we believe that the Arctic region should be excluded within this PEIS process as the circumstances differ greatly from the Bering Sea Aleutian Islands, and Gulf of Alaska regions. There are currently no commercial fishing activities in the Arctic EEZ region, and a process must include Arctic coastal communities and analysis of fishing impacts that considers the rapidly changing nature of the Arctic. If the Arctic is to be included in the PEIS then it must be clear and specific on the purposes, needs, and analysis.



Recognize the rights and needs of Alaskan Native Peoples and subsistence cultures

The PEIS should ensure tribes and tribal entities who are seeking a meaningful voice throughout the management process and representation in the Council bodies. It is never too early to start collaboration and engagement with and inclusion of tribes into the process. It should require incorporation of Tribal Consultation information into Council analyses and decision-making processes before final action. Subsistence communities are a fundamental component of the Bering Sea ecosystem, and any adverse impacts must be evaluated. Range of alternatives must include management considerations for addressing impacts to subsistence and habitat. Such as ecosystem change affecting non-target species that have differential impacts on fishery participants and gear groups, and consequences for subsistence communities extends to the cultural, economic, and social wellbeing of Alaska Native peoples owed distinct rights by the federal government.

Developing a more robust knowledge base is necessary to fully understand, anticipate, and address the effects of climate change. This knowledge base should include both western sciences as well traditional Indigenous knowledge. One pathway would be the approval and adoption of the developing Local and Traditional Knowledge Subsistence protocol within the PEIS. As well as ensuring sufficient social science capacity is in place on Council bodies, Council staff, and at the Alaska Fisheries Science Center.

Thank you for the opportunity to submit these comments. We truly hope the Council will consider these actions and continue to seek more active involvement by communities affected by fishery management decisions, including those that are not currently engaged in the Council process. We look forward to continuing to engage with you on these issues.

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

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