



June 2nd, 2023
Simon Kinneen, Chair
North Pacific Fishery Management Council
1007 West 3rd Ave., Suite 400
Anchorage, Alaska 99501

**RE: D2 Programmatic Environmental Impact Statement (PEIS) Purpose and Need, alternatives;
Ecosystem Committee Report**

Dear Chair Tweit and members of the Ecosystem Committee:

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 Council regarding the draft Purpose and Need 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 qaqamiġuġ (subsistence) way of life, and the burden of conservation. The Pribilof Islands are home to the largest breeding population of Laaqudan or known as Northern Fur Seals also known as Laaqudan, are recognized as kin to the Unangan and are integral to cultural events, traditional foods, and ceremony. Since the 1970s, the Laaqudan 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 and report provided by the Ecosystem Committee and Council Staff thus far. The 2004 PEIS management 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 inclusion to the voices and knowledge systems of Alaska Native tribes and tribal entities as outlined in the draft PEIS Purpose and Need. **We recommend the**

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/>

Council to initiate a new PEIS analysis for all federal fisheries in the Gulf of Alaska, the Bering Sea, and Aleutian Islands managed under the Magnuson Stevens Fishery Conservation and Management Act and the Halibut Act. We believe that a new comprehensive National Environmental Policy Act (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. Not only does analysis expand the PEIS goals and objectives, but it also needs to be accountable to them.

The proposed alternatives in the Ecosystem Committee report are currently broad, and we want to ensure that the range of alternatives be further developed during input from the public through the formal scoping process. **We prefer a highly precautionary ecosystem-based management policy that is action focusing.** As fisheries adapts to the escalating unpredictability and drastic challenges of climate change impacts a highly precautionary ecosystem-based management policy is vital. These should include:

Respect and respond to 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. We recommend development management framework that activity engages with Alaska Native tribes and communities recognizing that it takes resources and capacity to achieve. Scoping outreach with Tribes, industry, and stakeholders in the region should begin once the PEIS analysis process is initiated as practicable. 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.

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 (FMPs). Additionally, it should include 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 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.

Exclude the Arctic Region in the Geographic and Biological Scope

We believe that the Arctic region should be excluded within the PEIS scope as the circumstances differ greatly from the Bering Sea Aleutian Islands, and Gulf of Alaska regions. We share concerns from some committee members and the public of including the Arctic region in the PEIS scope. The issues and concerns presented in the Arctic region are distinctively different from the Bering Sea and Gulf of Alaska regions. In accordance with the Council's 2009 approved Arctic FMP Section 2.2.2 *Process and Review Criteria for Authorizing a Commercial Fishery in the Arctic*, an fishery development analysis must be conducted and the FMP must be amended are among criteria to authorize a commercial fishery in the Arctic.⁶ Furthermore the 2021 *International agreement of Unregulated High Seas Fisheries in the central Arctic Ocean*, by nine countries including the U.S that signifies long term commitments for a collaborative and precautionary approach to fisheries and research in the Arctic.⁷ We recommend that the Council should align the PEIS scope with these previous actions and to not overlook them.

Utilizing the best science available with frameworks to include Indigenous Science and Knowledge.

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 Local and Traditional Knowledge Subsistence (LTKKS) protocol and onramps presented by the LTKKS taskforce 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. Observational networks such as the Indigenous Sentinels Network

⁶ <https://www.npfmc.org/fisheries-issues/fisheries/fishing-in-the-arctic/>

⁷ <https://www.state.gov/the-agreement-to-prevent-unregulated-high-seas-fisheries-in-the-central-arctic-ocean-enters-into-force/#:~:text=the%20foreseeable%20future,-,The%20Agreement%20to%20Prevent%20Unregulated%20High%20Seas%20Fisheries%20in%20the,Greenland%20on%20October%203%2C%202018.>



and Skipper Science, and collaborations with Alaska Native communities and organizations can fulfill data gaps and knowledge that is not under the Council and NMFS purview.

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." The signature is written in a cursive style.

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