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June 2, 2018

To: North Pacific Fishery Management Council
605 West 4th
Suite 306
Anchorage, AK 99501

(Delivered in person at the June Council meeting and via danhullak@gmail.com,
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Subject: Kawerak comments on Council Agenda Items B1, D1, D2, D6

Council members,

Kawerak would like to provide comments and recommendations regarding several items on the agenda for the June 2018 Council meeting. Each agenda item is separately addressed below.

B1: Ecosystem Workshop Summary Report and Discussion Guide

Several Kawerak staff attended and participated in the Ecosystem Workshop. In line with the 'discussion guide' that was produced, below we provide a few of our 'take-aways', as well as a description of topics that we believe require further discussion or clarification.

- We applaud and encourage the Council's current efforts to incorporate Traditional Knowledge into Council processes and decision-making. We hope this work will continue and expand. Traditional Knowledge can make important contributions to ecosystem understandings.
- Transparency , trust and effective communication are all things that many of our region's Tribes, and Alaska Native communities and organizations we work with, believe the Council could improve upon. The Council's recent discussions about outreach and engagement are crucial to this and we encourage the Council to be as inclusive as possible when developing new initiatives and efforts in this realm (also see our comments below on D2)
- We encourage the Council to continue discussions about and efforts to move from single-species management to ecosystem-level management.
- Traditional Knowledge should be considered in terms of 'early warnings' and ongoing or new changes in the ecosystem.

- “Squishy data”: We were confused by this discussion at the workshop, and continue to be. Additionally, it is also unclear what “contextual information” means in the context of the workshop report. If the terms are going to be used they should be clearly defined. Though we are not entirely certain what “squishy data” is, we don’t believe that Traditional Knowledge falls into this category and believe that it should be removed from the discussion in the workshop report.
- Additionally, regarding terminology, we encourage you to use Kawerak’s most up-to-date definition of Traditional Knowledge. You can access it here: <http://kawerak.org/wp-content/uploads/2018/04/Kawerak-Knowledge-and-Subsistence-Related-Terms.pdf>. Traditional Knowledge and Local Knowledge are very different concepts.
- While Kawerak staff were not in every break out group, we don’t recall discussion about ‘leveraging the full value of LTK by integrating knowledge in a structured and possibly quantitative way.’ We agree that Traditional Knowledge should be incorporated into Council processes through a clear process. Traditional Knowledge information, though, is rarely quantitative and it does not need to be in order for it to be of great value in Council processes and decision-making.
- At the workshop we expressed that caution should be used when considering information from the LEO Network. We reiterate that here and also want to make sure it is clear that the LEO Network does not document Traditional Knowledge. If data from this source is to be used, the Council should ensure the Network’s methods, structures and participation are clearly explained and understood.
- We agree that Traditional Knowledge is “most valuable as a scientific input early in the process, rather than as input during the management process” if the sentiment being expressed here is that it is best incorporated ‘early’ as opposed to ‘late’. However, on the whole we would argue that TK is valuable as an input throughout the process – from early all the way through to the later management processes.
- We believe that the Ecosystem Committee is a valuable asset to the Council, most especially as it includes community representation and participation from Tribes and communities – as it currently does. We believe that EC discussions and work surrounding issues of Traditional Knowledge, subsistence, indigenous communities, co-production of knowledge and other topics are highly valuable. We encourage the continuation and expansion of opportunities for Tribal and community engagement in the Council itself, as well as Council committees, plan teams and other entities.
- We would encourage future considerations of human dimensions, including related to TK holders, to not be confined to thinking about this in terms of information sources. For example, there is an important need and associated value with considering the role of humans in the ecosystem, and also the value of engaging indigenous people in the process irrespective of their status as knowledge holders. Additionally, it is important to understand that TK should not only be seen as a source of data but also as potentially informing Council processes in terms of alternative considerations of values, economics, management, epistemologies, and so on.
- We encourage the committee to provide for community participation and to schedule outreach efforts like staff attending regional events

D1: Social Science Plan Team Report

Kawerak staff attended the SSPT meeting in early May and also provided verbal public comment at the meeting. We plan to submit additional written comments regarding the SSPT, beyond what is discussed below.

- Kawerak's comments during public testimony were not included in the SSPT report, nor was there a summary of them. Our comments should be included. Others who spoke to the SSPT had their comments summarized and included.
- We would like to see additional *non-economic* social science expertise on this Plan Team. This would include additional non-economic social scientists, Traditional Knowledge holders, and others. These individuals should not have to be affiliated with the Council or agencies.
- The SSPT reviewed internal AFSC research proposals to give feedback to the authors. Kawerak found this to be an unusual way for a Council body to spend time and agreed with the SSPT members who expressed concerns about the appropriateness of undertaking this review and of only offering this 'service' to AFSC researchers. The SSPT chair stated that review of proposals is a 'core function' of the SSPT. This should be clarified in the stated mission of the SSPT, if this is the case.
- There was a distinct preference in the conversation and discussion of the SSPT towards quantitative data. Kawerak had hoped that this Team would be more open to and familiar with qualitative data and its methods, theory and uses. Part of the reason that Kawerak was initially supportive of and excited about this Team was for the possibility of engaging experts and expertise about qualitative data and to no longer have Council analyses focus on the quantitative. Team members specifically identified their understanding and use of qualitative data as one of their ongoing "analytical troubles." We hope that future SSPT meetings will make additional progress in the direction of engaging more significantly with qualitative information, the non-economic social sciences, and Traditional Knowledge.
- There was lengthy discussion, during various parts of the meeting, about the perceived difficulty of using Traditional Knowledge information or other qualitative information (see Section 4 of the report, for example). The minutes from the meeting do not really capture the level of this discussion. Many of the Team have very little understanding of anthropological/social science/indigenous methodologies, theory or data. This is because the team has so many economics-centered staff (who have not been trained or educated in other disciplines). This relates directly to our second point, above.
- As an example of the above, it was discussed that it is limiting for analysts to try to capture and use qualitative information (for example, about 'values'). There are limitations to every kind of data (including quantitative data), which is why it is important to have people with the right training and experience on staff or as part of Council-affiliated bodies (i.e. institutional capacity).
- The report states that, "The SSPT's role *might be* in supporting the value of both qualitative and quantitative data" (emphasis added). This should most definitely be a key role of the SSPT. Many of the SSPT members, even at the end of this meeting, still seemed to place higher value on and to be much more comfortable with quantitative information. This must be overcome if the Council wants to move more towards a deeper understanding of the ecosystem and its various components, and if the Council wants to be inclusive. Expanded membership on the SSPT will be required to achieve this potential 'role' for the SSPT and for the larger goal of including more non-economic social science information in Council decision making.
- At this time, we do not think that the SSPT is the body that should be relied upon to develop, for example, processes and protocols for the incorporation of Traditional Knowledge and subsistence information into Council processes and decision-making.

This work should remain primarily as part of the Bering Sea FEP Action Module work, where a group will be formed to work on these issues.

- We were pleased to see in the meeting minutes at least brief discussion of the need to increase institutional capacity in the realm of non-economic social science. This is a specific recommendation that Kawerak has been making for many years, and which we also reiterated in public comment during this SSPT meeting. There is little value, from our perspective, in developing processes for evaluating the quality of qualitative information, or in developing ‘checklists’ or bibliographies for analysts, if there are not appropriately trained staff with the experience, education and training specifically in non-economic social science methods, theory and data to do the actual analysis of such information. Partnering with other organizations or institutions for this kind of work is a welcome, but only a partial, solution. Institutional capacity building for this at the Council level and at the AFSC level is greatly needed. Kawerak specifically asked the SSPT to formulate this ‘gap’ or need into a recommendation to the Council and more broadly to the Alaska Fisheries Science Center (AFSC) and others, but that request was rebuffed.
- Kawerak specifically requests that the NPFMC hire additional staff with training, education and experience in non-economic social science fields such as Anthropology. We request the same of the AFSC and encourage the Council to endorse that request.

D2: Community engagement draft committee scope and ideas for RFP – Report

Kawerak staff had limited time to review this report because of the late date it was made available to the public. We hope that this will be an ongoing discussion. Below we provide comments specific to the report and also to the questions asked by staff in the report.

- Kawerak and other Alaska Native and community organizations have repeatedly discussed the fact that while there may be existing opportunities for public engagement and comment, it is not only ‘opportunity’ that is the issue. The lack of *means and capacity* to participate in those opportunities must also be acknowledged and addressed.
- *Question 1 – What is the objective of this action?*
 - The Council has no formalized process for conducting outreach or engagement with rural or Alaska Native communities regarding Council processes or actions. Current “project specific communications” are inadequate. The former Rural Outreach Committee has been defunct for years. Tribes, Alaska Native communities and rural communities have requested that the Council do more to engage them in Council decision making. That Council has acknowledged that and addressing these gaps and concerns is the purpose of this action.
- *Question 2: Is the intention to clarify decisions and actions of the Council, or to solicit information that the Council does not now have that it needs to manage fisheries?*
 - Clarifying Council decisions and actions, and the impacts they will have, should certainly be a goal of this action. Additionally, soliciting information, as well as developing appropriate processes for soliciting information, should also be a goal of this action. A ‘public information officer’ may be of assistance in this, but a Tribal and rural community liaison would likely be a better fit. Additional non-economic social science staff and a Tribal liaison are long-standing requests from the indigenous community.
- *Question 3: Does the Council intend the action to replace the project-specific communications that now occur?*

- Communication strategies already in place, which are carried out for some Council actions, are known and acknowledged by Tribes. However, they have not been sufficient or successful from the perspective of communities. The known strategies need to potentially be improved, revised or dropped. Additional strategies for communication, outreach, consultation, engagement and so on need to be developed.
- Rather than a moderated workshop, we believe that a formal Committee should be appointed. That Committee – presumably filled with members who are familiar with Tribal and rural concerns, are familiar with a wide variety of outreach and engagement strategies, and who come from diverse backgrounds – will be best suited to determine what the next steps are. For example, they may determine that a workshop would be of value and have guidance as to the format it should follow. Or they may determine that they are best suited to immediately begin advising the Council and staff on ways forward.
- Draft charter: The wording for this charter is good. We would recommend adding two words to the final sentence (in bold in the following): *Community engagement involves two-way communication between the Council and communities at all stages of a project and allows for community concerns, **information, perspectives** and priorities to be shared clearly with the Council, whether part of an active Council action or not.*
- We do not understand the purpose of a formal “RFP” process. Is this something the Council has effectively done in the past? We agree that soliciting ideas on the topic of outreach and engagement from Alaska Native and rural communities is a good idea. We suggest that any newly formed Committee decide whether or not an “RFP”, or some other method of communicating their desire for feedback, is needed and how that request is formulated.
- We again ask – as we did previously in regards to the April 2018 ‘Outreach’ discussion paper – how the Council or staff have determined that previous outreach activities have been ‘effective and appropriate’? If there is a specific method through which this has been determined, we request that it be shared publicly.
- Finally, we request that Council and staff please review our previous comments regarding outreach and engagement which we provided in the form of a written comment letter (dated 4/2/18), and in public testimony, from the April 2018 meeting. There are many suggestions, recommendations and requests for further discussion that could positively inform this process, as well as the members of a newly formed committee.

D6: Research Priorities for 2018 - Review and approve

Kawerak and Bering Strait Tribes are very interested in becoming more involved in the process of determining Council Research Priorities. Our region and our Tribes have a variety of research priorities, as do other Tribes in western Alaska. Unfortunately, we have only just become familiar with the Council’s process for addressing research priorities, so do not have extensive feedback at this time. We hope to be included in, and further participate in, this process in the future.

- We support the comments submitted by the Aleut Community of St. Paul Island in relation to this agenda item. In particular, we share their concern about Plan Teams not being tasked to review projects or priorities related to some subsistence species.
- We would like to see the SSC engage specifically with Tribes and Alaska Native organizations when determining research priorities.
- An expanded SSPT (see above) should also be involved in review of research priorities (beyond just the “Catch Sharing Plans” noted in the D6 Action Memo).

- In terms of the document “D6 Catch Sharing Plan Research Priorities”, the characterization of ethnographic research as ‘complimentary’ to (or possibly complementary to) economic data is an understatement of the value of ethnography. Quality ethnographic work produces data that can be not only complementary to other types of data, but which can also stand alone. We would also like to note, for clarity here and elsewhere, that ‘ethnography’ is not the only kind of non-economic social science data collection method that has potential value for federal fishery management.
- We request that the updated five-year research priorities be provided to Kawerak, in addition to the other “usual” organizations/agencies listed in the D6 Action Memo.

Thank you for considering our comments and recommendations regarding these agenda items and activities. If you have questions or would like to further discuss this, please contact me at 907-443-4273 or juliery@kawerak.org or Rose Fosdick, Kawerak Vice President of Natural Resources and Ecosystem Committee member at 907-443-4377 or rfosdick@kawerak.org.

Sincerely,

A handwritten signature in black ink that reads "Julie Raymond-Yakoubian". The signature is written in a cursive, flowing style.

Julie Raymond-Yakoubian
Social Science Program Director
KAWERAK, INC.