

# Onramps for Local Knowledge, Traditional Knowledge, and Subsistence Information in the North Pacific Fishery Management Council's Process

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For further information contact: Kate Haapala, North Pacific Fishery Management Council  
1007 W. 3<sup>rd</sup> Ave, Suite 400, Anchorage, AK 99501  
(907) 271-2809

## Abstract:

The Council's motion from its February 2020 meeting directs the Local Knowledge, Traditional Knowledge, and Subsistence Taskforce to identify potential onramps (or points of entry) for incorporating Local Knowledge, Traditional Knowledge, the social science of Local Knowledge and Traditional Knowledge, and subsistence information into its decision-making process. This document contains eleven different onramp recommendations for the Council to consider changes to its current decision-making process. Each onramp recommendation is presented individually to provide the Council a highly flexible approach to deciding whether to take action and initiate future work on any individual onramp(s). The onramp recommendations are directly related to the eight guidelines housed in the *Local Knowledge, Traditional Knowledge, and Subsistence Protocol*. Together, the Protocol and onramp recommendations provide the full suite of information for the Council to consider how it could achieve its goals of better identifying, analyzing, and incorporating LK, TK, and subsistence information into its decision-making process.

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## 1. Introduction

The Council directed the Local Knowledge (LK), Traditional Knowledge (TK), and Subsistence Taskforce to identify potential onramps (or points of entry) to incorporate LK, TK, the social science of LK and TK, and subsistence information into the Council’s decision-making process.<sup>1 2</sup> This document contains eleven onramp recommendations for the Council to consider making changes to its current decision-making process to better incorporate these knowledge systems. The onramp recommendations are directly related to the eight guidelines in the LKTKS Protocol and can be understood as eleven different opportunities for the Council to implement those guidelines. Together, the LKTKS Protocol guidelines and onramp recommendations are the full suite of information for the Council to consider how it could achieve its goals of better identifying, analyzing, and incorporating LK, TK, and subsistence information into its decision-making process.

While there are interlinkages among the LKTKS Protocol guidelines and the onramp recommendations, the onramps are presented separately to provide the Council an opportunity to consider each document separately. By adopting the LKTKS Protocol, the Council would not also be adopting and therefore initiating work on the related onramp recommendations. Rather, the onramp recommendations are presented separately from the LKTKS Protocol, and as individual recommendations, to provide the Council a highly flexible approach for deciding whether to initiate future work on the individual onramp(s). To help the Council in its decision-making, the Taskforce has provided additional context and rationale for each onramp recommendation as well as some initial ideas for how to move them forward. While there are eleven distinct recommendations, they are not numbered to not signal a prioritization; each onramp recommendation offers different opportunities for incorporating LK, TK, the social science of LK and TK, and subsistence information.

When evaluating these onramp recommendations, it is important the Council also consider their implications for Council and staff time commitments and capacity. Additionally, if the Council initiates work on any individual onramp(s), the Council would need to consider and provide feedback on *who* should move the work forward. Would the Council’s preference be for staff to move forward with further developing these onramps, this Taskforce as a reconstituted body, or a Taskforce with new or modified membership? The Taskforce was originally formed to complete its work over a 2–3-year period, after which it would disband. The Taskforce recommends it disband after the Council takes final action, in line with the Council’s original intent for this body.<sup>3</sup> As such, the ideas and next steps for moving each onramp forward are written in a way that indicates Council staff would carry out any future work because of the Council’s original intent was to disband the Taskforce after its final products and report is presented.

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<sup>1</sup> The Council’s motion from its February 2020 meeting adopting the goals and objectives for this Taskforce can be found here: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=ce213a15-6672-4d0b-9fad-6b0719388804.pdf&fileName=D3%20MOTION%20.pdf>

<sup>2</sup> This document uses “Council decision-making” to denote a range of Council decisions and recommendations, from the selection of members for Council advisory bodies to the development of Council policies and practices to the Council process (often through initial and final review) that results in Council recommendations to NMFS. NMFS implements the Council’s recommendations for Fishery Management Plans (FMPs), FMP amendments, and regulations only if those recommendations are consistent with the Magnuson-Stevens Fishery Conservation and Management Act and implementing regulations, the National Standards, the applicable fishery management plan(s), and other applicable law.

<sup>3</sup> For more information on the Taskforce’s rationale for this recommendation, see the written report from the Taskforce’s March 2023 meeting: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=e80ce6e5-b04c-4599-b36e-51b1c30c698a.pdf&fileName=March%20Minutes.pdf>

## 2. LK, TK, and subsistence information onramp recommendations

### **The Taskforce recommends the Council adopt the LKTKS Protocol**

The Taskforce developed the LKTKS Protocol over a multi-year process in response to the Council's adopted goals for this body. The LKTKS Protocol provides foundational information for working with LK, TK, and subsistence information, and its content is based on the diverse expertise and consensus of Taskforce members. Over the last three years (2020-2023), the LKTKS Taskforce has had significant public engagement in its meetings and received input from the Council and its advisory bodies including the Bering Sea Fishery Ecosystem Plan Team, Ecosystem Committee, Social Science Planning Team, Scientific and Statistical Committee, and the Advisory Panel. Adopting the LKTKS Protocol would demonstrate the Council's commitment and approach to working with LK, TK, and subsistence information.

### **The Taskforce recommends the Council express support for the use of the LKTKS search engine and dedicate Council staff time to maintaining it as needed.**

In response to the Council's motion directing the Taskforce to create *processes* and protocols for identifying, analyzing, and incorporating LK, TK, and subsistence information into the Council's decision-making process, the Taskforce developed the LKTKS [search engine](#). The search engine contains sources of LK, TK, the social science of LK and TK, and subsistence information including peer reviewed articles, databases, narrative sources of information, reports, technical memos, and other sources of information. The search engine is one process that could help analytical staff identify sources of LK and TK, the social science of LK and TK, and subsistence information in the timelines that analytical staff work under.

#### *Ideas for moving forward*

- To move forward with this onramp recommendation, the Council could express its support for the continued use of the LKTKS search engine.
- The Taskforce does not anticipate the time or resources required to achieve this onramp to be significant, but it is important for the Council to be aware of and consider among its staffing priorities. Moving forward with this onramp recommendation would require Council staff to find ways to keep new sources of information flowing into the search engine and to maintain it over time. Currently, there is an email address ([npfmc.lktnks@gmail.com](mailto:npfmc.lktnks@gmail.com)) for members of the public to submit sources of information to be added to the search engine. The Taskforce has discussed that advertising the search engine at events like the Alaska Marine Science Symposium or coordinating with the North Pacific Research Board could provide opportunities to gain a broader range of information inputs and lessen the burden on staff to actively search out new sources over time.

### **The Taskforce recommends the Council initiate a process whereby Tribes could engage directly with the Council.**

Council staff worked with NOAA General Counsel to understand what would be feasible for the Council with respect to Tribal engagement. There are two engagement pathways available to the Council for its consideration.

**Option 1:** The Council or one of its advisory bodies could host informal engagement session(s) with Tribes and/or Tribal Consortia. There is flexibility for the form of these sessions, meaning engagement sessions could occur under an agenda item at a Council meeting (e.g., during the B reports) or as a separate meeting between Tribes and the Council when requested by Tribes or the Council. In either scenario, procedural requirements of the Magnuson-Stevens Fishery Conservation and Management Act

(MSA) would apply to any engagement session hosted by the Council or a Council committee (16 U.S.C. 1852(e), (g), (i)). That means Council-Tribal engagement sessions in any form must be noticed and open to the public, interested persons must be allowed to submit oral or written comments, and detailed minutes must be kept (a requirement that is fulfilled in practice by the Council through meeting reports and/or recordings). Because these would be publicly noticed sessions, a quorum of Council members could attend. It is important to note that this approach is different from formal Tribal Consultations held by Federal agencies, which are non-public meetings with single or multiple Tribes that do not trigger the MSA's procedural requirements.

**Option 2:** A second pathway available to the Council is to participate in engagement trips that provide opportunities for two-way dialogue and knowledge sharing as the Council has done in the past. When participating in these trips, a non-quorum (i.e., no more than 5) of Council members can participate without the trip requiring notice as a public meeting or the other procedural formalities under the MSA (16 U.S.C. 1852(e), (g), (i)), though that does not prohibit members of the public who are not Tribal members or officials from attending.

The Taskforce has discussed the input from NOAA General Counsel and agrees that both pathways for Tribal engagement are important for hearing from knowledge holders. While there could be some sensitivities with Council-Tribal engagement sessions being hosted as a public meeting, the Taskforce's dialogue on the issue has noted that Tribes could choose to engage and share on some topics with the Council in a public format while reserving more sensitive issues for Tribal Consultations with NMFS.

The Council has experienced consistent and increased engagement from Alaska Native Tribes and Tribal Consortia in its decision-making process. Alaska Native Tribes are sovereign governments with constitutions, bylaws, and a right to self-determination. This legal status distinguishes Tribes from other fishery stakeholder groups that engage the Council's decision-making process. The Taskforce understands the National Marine Fisheries Service is the Federal agency responsible for undertaking Tribal Consultations under Executive Order (EO)13175, and it is not suggesting the Council lead formal Tribal Consultations as Tribal Consultations are government-to-government relations.

Implementing a process for Council-Tribal engagement could provide the Council, Alaska Natives Tribes and/or Tribal Consortia meaningful opportunities for deliberative and inclusive dialogue as well as opportunities to build relationships and mutual trust. Additionally, LK and TK resides within people, and especially TK is usually shared orally (though the lack of written TK does not mean knowledge does not exist for a particular action or issue). It is possible but not guaranteed that LK and/or TK could be shared directly with the Council during these engagement sessions by Tribal members. The oral nature of sharing these knowledge systems can make it challenging for Council staff to attain and use written forms of LK and TK, or the social science of LK and TK, to include in analytical documents that inform a broad range of Council actions. Council-Tribal engagement could also mitigate challenges for staff as they identify TK and work with TK and TK holders.

*Ideas for moving forward:*

- To move forward with option 1, the Council would need to consider its goals for hosting Council-Tribal engagement sessions (e.g., receiving input on management actions, information sharing, receiving information updates from Tribal and community members on ecosystem changes, etc.).
  - The Council could task Council staff with developing a discussion paper outlining a conceptual model(s) for Council-Tribal engagement. Points for consideration that would need further exploration in the conceptual model include the timing of engagement sessions (e.g., would engagement sessions be a defined time and time limit during a Council meeting or a separate meeting?), how the outcomes would be recorded or reported, among other details that would need to be

- considered. This approach would provide the Council, Tribes, and other members of the public additional opportunities to engage with, and provide feedback on, the ideas put forward in the discussion paper.
- To move forward with option 2, the Council would also need to consider its goals for outreach and engagement. The Council could direct the Community Engagement Committee with creating a strategic engagement plan. This plan could include key meetings for staff presentations, communities to target for engagement trips, and more. The Council and/or the Community Engagement Committee could consider whether an over-arching strategic outreach and engagement plan would be appropriate or whether the plan and related efforts would be more effective at an action- or issue-specific level.

**The Taskforce recommends the Council request NMFS lead Consultations with Tribes early in the Council’s decision-making process, and that a non-quorum of Council members participate in these sessions when requested by NMFS or Tribes.**

This recommendation is in line with the Council’s previously expressed support for working with NMFS to receive and understand the results of Tribal Consultation meetings as early as possible in its process.<sup>4</sup> Council staff worked with NOAA General Counsel to understand whether the Council could participate in the Tribal Consultations led by NMFS to improve direct communication between Tribes and the Council. NMFS is the Federal agency responsible for implementing regulations that ensure the productivity and sustainability of Alaska’s fisheries and fishing communities. The Council works closely with the NMFS Alaska Regional Office, the regulatory agency that is responsible for overseeing the science-based stewardship of living marine resources and their habitat in the North Pacific and Arctic Oceans off Alaska, and the Alaska Fisheries Science Center (AFSC), the entity within NMFS that conducts research to monitor the health and sustainability of fish, marine mammals, their habitats, and the communities that depend on them.

NOAA General Counsel provided input that EO 13175 directs agencies to have “an accountable process to ensure meaningful and timely input by Tribal officials in the development of regulatory policies that have tribal implications.” To be meaningful and timely, NMFS should consult with Tribes prior to promulgating any regulatory policy that has Tribal implications. Under EO 13175, policies have Tribal implications when they have “substantial direct effects on one or more Indian Tribes, on the relationship between the Federal government and Indian Tribes, or on the distribution of power and responsibilities between the Federal government and Indian Tribes.” EO 13175 also directs Federal agencies to have “an accountable process to ensure meaningful and timely input by Tribal officials in the development of regulatory policies that have tribal implications.”

Additionally, the November 30, 2022, Presidential Memorandum on Uniform Standards for Tribal Consultation directs: If there is a reasonable basis to believe that a policy may have Tribal implications, consistent with the definition in EO 13175, Federal agencies shall follow the applicable requirements for consultation. An agency may still engage in Tribal consultation even if the agency determines that a policy will not have Tribal implications and should consider doing so if the agency determines that a policy is of interest to a Tribe or Tribes.

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<sup>4</sup> See the Council's motion from the February 2021 meeting related to the Community Engagement Committee for more information: <https://meetings.npfmc.org/CommentReview/DownloadFile?p=2c4a513f-889d-4647-9bea-29ed4bde660f.pdf&fileName=D1%20Motion.pdf>

NOAA General Counsel also clarified that a non-quorum of Council members and any number of Council staff could participate in formal Consultations when their participation is requested by NMFS or Tribes.<sup>5</sup> However, while a non-quorum of Council members could participate in Tribal Consultations, those members in attendance could not speak on behalf of the Council as a whole at those meetings. The Council has received consistent feedback from Alaska Native Tribes, Tribal Consortia, and their representatives on the importance of ongoing and meaningful Tribal Consultations. The Council has also received input on the importance of the results of those Consultations being communicated to the Council early in its decision-making process so the substantive dialogue and outcomes of Tribal Consultations could inform the Council's decision-making. NMFS has historically conducted Tribal Consultations after the Council selects a Preferred Alternative and this can make it challenging for Tribes and their representatives to having meaningful and timely input in the development of fisheries management and regulations. NMFS is not obligated to consult only after a Preferred Alternative is selected, though it is historical precedent.

The information shared at Tribal Consultations could help the Council to better understand Tribal perspectives and knowledge on the potential impacts of different actions. The rationale for how this onramp recommendation could better incorporate LK and TK into the Council's decision-making process is largely the same as the onramp for Council-Tribal engagement above. However, it is important to note that TK may be more likely to be shared in Tribal Consultations because they are not public meetings, though there is no guarantee that TK would be shared.

*Ideas for moving forward:*

- To move forward, the Council could express its commitment to have a non-quorum of Council members participate in Tribal Consultations when requested by NMFS or Tribes.
- The Council could also task Council staff with coordinating with staff from NMFS Alaska Region, and particularly their Tribal Liaison and Tribal Engagement Team, to develop a process for communicating the results and outcomes of Tribal Consultations that are relevant to, or have a clear nexus with, the Council's process. This would take cooperation and collaboration from the agency, but the liaison role could anchor a direct pathway for communication among Tribes, the Council, and the agency. The communication plan could be brought back to the Council for the Council to consider and the public to weigh in on. The communication plan would also need to address expectations about confidentiality and how information gleaned from Tribal Consultations, and that inform Council decision-making, would become part of the record for supporting the Council's recommendation and NMFS's implementation.

**The Taskforce recommends the Council request Federal agencies that provide relevant presentations or reports to the Council with Tribal co-management partners extend invitations to Tribal partners to present on co-management activities during the B reports.**

The Taskforce is aware that Tribal co-management partners are periodically invited to provide presentations to the Council or committees alongside Federal agency staff (e.g., Northern Fur Seals). However, there are differences in when this form of engagement occurs. The intent of this onramp recommendation is to increase consistency and equity for Tribal co-management partners, and for the Council to express its expectation that those Federal agencies that engage in co-management with Tribes

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<sup>5</sup> It is important to keep in mind that, in this instance, a non-quorum of Council members would be a count of four members in addition to the NMFS Regional Administrator who often participates in formal Tribal Consultations.

(e.g., NMFS has eight co-management agreements) and provide reports to the Council would invite Tribal co-management partners to participate in these presentations to the Council. The Taskforce is not recommending it be mandatory for Tribal co-management partners to be present, rather that agency staff coordinate with their Tribal partners and extend an invitation to participate in the presentation.

*Ideas for moving forward*

- The Council could task Council staff to modify working practices and approaches for organizing the Council's B reports. Should the Council initiate action on this onramp, the onus would be on Council staff to remind agencies periodically about the Council's intent and interest to have co-managers part of the agency presentations.

**The Taskforce recommends the Council modify the Council Statement of Organization, Practices, and Procedures (SOPPs) and/or terms of reference (TOR) for advisory bodies to include specific language to add designated Alaska Native Tribal seat(s) to be held by Tribal representatives.**

Taskforce members have noted their support for the Council's recent action to add one designated Alaska Native Tribal seat to its Advisory Panel at the October 2022 meeting. This onramp recommendation looks to build on that Council action to facilitate expanded Alaska Native Tribal representation across the Council's advisory bodies (meant collectively to include Plan Teams, Committees, and the Scientific and Statistical Committee (SSC)). Modifying the TOR and/or Council SOPPs to add designated Alaska Native Tribal seat(s) across Council advisory bodies could encourage Alaska Native Elders, Tribes, and communities to participate in the Council's process, feeling as though added representation is a meaningful invitation to participate.

Because there is a wide range of capacity and expertise among Alaska Native Tribes, the Taskforce is not recommending specific advisory bodies for additional designated seat(s). Likewise, the Taskforce is not recommending a particular count of seats to not be overly restrictive should there be a number of well-qualified nominees; though, the intent of this recommendation is that there would be at least one Alaska Native Tribal seat held on each Council advisory body to be filled by a Tribal representative. The Taskforce intentionally chose the language "Alaska Native Tribal seat" because the intent is that these seats would be filled by a designated representative of an Alaska Native Tribe or Tribal Consortia. If a Tribal representative is not an LK or TK holder, Tribes could provide LK or TK to the Tribal representative to share on their behalf at advisory body meetings. The Taskforce has agreed that Tribes and/or Tribal Consortia are best equipped to recommend highly qualified individuals who have the skill set and authority for specific Council bodies.

*Ideas for moving forward:*

- To help its decision-making, a first step for the Council could be tasking Council staff with developing a brief discussion paper that identifies (among other things pending Council input) a) the affiliation, discipline, and representation within all Council bodies (e.g., this would include disciplinary training, fisheries sector, regional and organization affiliation, and more); b) an approach and timeline for how the Council could consider adding one designated Alaska Native Tribal seat to its advisory bodies (e.g., take a tiered approach to ensure the Council is not reviewing all nominations at one time). The Council would need then to consider the advisory bodies for which it may want to solicit nominations, how many seats the Council would consider, and whether regional or issue/action-specific expertise would be most beneficial. The Council would then need to task staff with drafting solicitation language or other points of consideration.

**The Taskforce recommends the Council solicit nominations for expanded LK and TK social science expertise on the Scientific and Statistical Committee (SSC).**

The Scientific and Statistical Committee (SSC) plays a vital role in the Council’s process by reviewing all assessments, analyses, and reports for their scientific/analytical approaches, validity, and utility to inform the Council’s decision-making. The Taskforce is not asking for a designated LK and TK social science seat or for a particular count of seats. Expanding the SSC’s existing expertise related to LK and TK systems would support the use of best scientific information available across the Council’s decision-making process, and in turn, improve the SSC’s overall recommendations to the Council.

More specifically, in a future where there is greater access and inclusion of LK, TK, and subsistence information in Council decision-making documents, the SSC and the Council would benefit from broadening that specific expertise to provide input and feedback on analytical reports and documents. For example, additional LK and TK social science expertise could help the SSC and Council navigate those instances where LK and TK yield different insights that western scientific information (Guideline 8). Expanded LK and TK expertise on the SSC could also provide analytical staff and AFSC scientists additional feedback on the methods or approaches used for assessments, analytical documents, and other reports through the Council’s iterative process.

*Ideas for moving forward:*

- The Council could direct staff to write a solicitation for SSC nominations that includes explicit language signaling the Council’s interest and intent for soliciting nominations from social scientists with experience working with LK and TK systems.

**The Taskforce recommends the Council host a workshop in concert with its research priorities process to solicit broad public input on selecting core research questions to assist the Council in managing the nation’s resources.**

Section 302(h)(7) of the MSA directs that the Councils shall “develop, in conjunction with the scientific and statistical committee, multi-year research priorities for fisheries, fisheries interactions, habitats, and other areas of research that are necessary for management purposes.” The Council’s research priority process starts with the Plan Teams (Gulf of Alaska and Bering Sea Aleutian Island Groundfish, crab, and Scallop) which review existing research priorities and make recommendations for modifications or additions to the list, as needed. The research priorities that emerge from the Plan Team process often focus on stock assessment priorities and are then reviewed by the SSC which holds broader membership and expertise prior to their review by the Council. The Council currently reviews research priorities on a triennial basis.

The Council has received public comment from Alaska Native Tribes, Tribal Consortia, and fishery stakeholders that the current research priorities process can be difficult to navigate and lacks transparency. It can also be challenging for the public, particularly those that reside in remote communities, to participate across multiple Plan Team meetings.

The Taskforce is making this recommendation because a workshop held in advance of the SSC’s review of Plan Team research priorities could provide a meaningful opportunity for the SSC and Council to solicit broad input on the key research questions and needs for future management. This could augment the current research priorities process, particularly related to LK and TK observations or changes to subsistence practices or uses of resources. Additionally, a workshop could provide a streamlined and inclusive opportunity for Alaska Native Tribes and Consortia, industry, community representatives and more to bring forward their proposals and ideas on these important questions or topics. The Taskforce has noted there could be challenges for setting the scope of the workshop, and the Council could find it more effective to host region-specific workshops.



*Ideas for moving forward:*

- The Council could task staff with developing a workshop prior to, or in conjunction with, the research priorities process so the Scientific and Statistical Committee and the Council receive streamlined recommendations from Alaska Native Tribes and Consortia, the fishing industry, and community representatives on the key research questions and topics to inform fisheries management. If the Council would like to initiate a workshop, it would be ideal for the Council to provide input on whether it would like that workshop to have a regional focus (e.g., Bering Sea), the scope of the workshop, whether it envisions a planning subgroup and broad input on who would compose that subgroup (e.g., SSC members, AFSC staff, Council staff, etc.).

**The Taskforce recommends the Council implement the LKTKS template for working with LK, TK, and Subsistence information to formalize a process for incorporating LK, TK, the social science of LK and TK, and subsistence information into the Council's decision-making process.**

The Taskforce developed a template that includes guiding questions for analytical staff to consider as they build out their analyses to facilitate the consistent inclusion of LK, TK, and subsistence information. This template is one approach to formalizing a process for incorporating these knowledge systems in a more standardized way to support Council decision-making. The guiding questions are broad enough to be applied across a range of Council actions, though it is expected that the subsequent information identified and its use in documents to support Council decision-making will be diverse.

The template is not intended to prescribe a narrow approach for staff. Rather, it aims to provide a starting point for staff analyses. This template is meant to be used in conjunction with other staff analytical templates and the LKTKS Protocol, as needed and appropriate. It is envisioned that this template will be modified and evolve over time as it is put into practice by analytical staff. When engaging work with TK systems, it is important to be mindful of whether there is appropriate expertise, training, and resources available to work with TK systems and TK holders. The template could also be shared with AFSC and NMFS Alaska Regional Office staff, if appropriate.

*Ideas for moving forward:*

- The Council could express its support for Council staff to implement the LKTKS analytical template (see Appendix A).

**The Taskforce recommends the Council modify its public comment procedures to allow testifiers to provide introductions without it counting against their allowed time limit for oral public comments at Council, Scientific and Statistical Committee, and Advisory Panel meetings.**

The Taskforce has discussed how Alaska Native peoples have ways of introducing themselves. Traditional introductions often center the person in relationship with their family and community among other things, emphasizing the importance of the connections between people as well as people and places. This onramp recommendation is related to Guideline 6 and the local or cultural protocols guiding how individuals engage in the Council's process. However, to provide balance and equity, the Taskforce is recommending that all members of the public participating in the Council's process be allowed to introduce themselves before their timer for oral comments begins. This would be a gesture to demonstrate respect.

*Ideas for moving forward:*

- The Council could task staff with updating its SOPPs to reflect these changes to public comment procedures to allow all members of the public to provide introductions without those introductions counting towards their allowed time limit.

**The Taskforce recommends the Council develop a plan to increase capacity in non-economic social sciences, and LKTKS expertise.**

The Taskforce has consistently defined ‘capacity,’ ‘increasing capacity,’ or ‘capacity building’ broadly because there are many approaches that could be taken. Better incorporating LK, TK, the social science of LK and TK, and subsistence information into analytical documents that inform Council decision-making would require more social science research to ensure action- and process-specific work based on these knowledge systems is available for staff to use. While the LKTKS search engine is a useful tool, and it is anticipated it could help analytical staff more easily locate sources of LKTKS information, there continues to be a dearth of social science research specific to the fisheries under the Council’s jurisdiction.

As stated above, LK and TK can yield broad and timely observations about environmental and climate changes, shifts in species distribution, the importance of particular cultural or subsistence practices, and more. The non-economic social sciences (e.g., anthropology, sociology, human geography, political science, and others) are uniquely positioned to collect and analyze LK and TK because of the methodologies that are required to work with these knowledge systems.

*Ideas for moving forward:*

- The Council could write a letter to the Alaska Fisheries Science Center expressing its support for additional non-economic social science staff, particularly with an emphasis working with LK or TK systems.
- The Council could support specific social science research priorities once identified by either the Social Sciences Planning Team, SSC, or other process (e.g., new public research priorities workshop onramp). This could be achieved by tasking the Social Sciences Planning Team with completing the Data Gaps Analysis which identifies current data gaps, priorities, and synergies for social science relevant to the Council’s process. This would require the Council to reconstitute the Social Sciences Planning Team. Alternatively, the Council could task staff with conducting a Social Science Data Gaps Analysis.
  - Potential examples of such projects include large-scale, regularly occurring IFQ holder surveys, oral histories with Bering Sea crab skippers, and others. These types of social science research projects could be designed to achieve multiple research goals (e.g., understanding social and economic impacts or changes in a fishery as well as environmental observations). This analysis is an important first step towards understanding the current gaps and opportunities for social science, but particularly LK, TK, and the social science of LK and TK, in the Council’s process.

Table 1 provides a crosswalk of the onramp recommendations with the LKTKS Protocol guidelines to help illustrate where the Taskforce envisions interlinkages between each onramp recommendation and guideline at a high-level. As stated in the Introduction, the onramp recommendations could be considered as 11 different opportunities to implement the guidelines.

**Table 1 Crosswalk of onramp recommendations to the related LKTKS Protocol guidelines**

<b>Onramp recommendation</b>	<b>Related Guidelines</b>
Adopt the Protocol	Guidelines 1-8
Support for, and dedicated staff time to maintain, the LKTKS search engine	Guideline 3 and 7
Initiate a process whereby Tribes could engage with the Council	Guideline 1-4, 6 and 7; Guideline 5 would inform how the onramp would be carried out
NMFS led Consultations occur early in the decision-making process and a non-quorum of Council members participate, when invited	Guideline 1-4, 6 and 7; Guideline 5 would inform how the onramp would be carried out
Request Federal agencies with co-management partners extend invitations to present to Tribal partners	Guidelines 1, 3, 5, 6, and 7
Expand designated Alaska Native Tribal seats to be held by Tribal representatives across advisory bodies	Guidelines 1-4, 7 and 8
Solicit nominations for expanded LK and TK social science expertise on the SSC	Guidelines 1-4, 7 and 8
Workshop to solicit broad input from the public and knowledge holders during research priorities process	Guidelines 1-4, 6-8; Guideline 5 would inform how the onramp would be carried out
Implement template with guiding questions for LKTKS information	Guidelines 1-4 and 7; Guideline 5 would inform how the onramp would be carried out
Modify public comment procedures to allow for introductions	Guidelines 1, 3, and 5
Plan to increase non-economic social science capacity and LKTKS expertise more specifically	Guidelines 2, 3, 7, and 8

### **3. Capacity and resources required for LKTKS Protocol and onramp implementation**

At the April 2023 Council meeting, the Council requested input from the Taskforce on the capacity and other resources required for implementing the LKTKS Protocol and onramp recommendations. The Taskforce has identified three primary resources needed for implementation: **personnel, time, and partnerships.**

The Taskforce agrees that implementing the Protocol and onramp recommendations to their fullest potential, and in a holistic way, would require additional analytical staff and social scientists at AFSC with the expertise (i.e., capacity) to work with LKTKS information. The Taskforce understands the Council is currently limited in its ability to hire additional analytical staff and it is beyond the Council’s purview to influence hiring decisions at AFSC. The potential tension here is twofold. Upon implementation, it is expected that analytical staff would be expected to increase their workload (e.g., by adding new sections to analytical documents or participating in Council-Tribal engagement sessions or NMFS led Tribal Consultations) without having additional personnel to disperse tasking. Additionally, Council staff’s ability to use the social science of LK and TK in documents that inform the Council’s decision-making hinges on the availability of that information and whether it can be accessed, analyzed, and incorporated in the timelines that analytical staff work under.

In light of the considerations related to analytical workload, the Taskforce discussed the importance of providing analytical staff sufficient (if not additional) time to incorporate LKTKS information into their analyses. The Taskforce is aware of the tradeoff – allowing for longer analytical timelines (i.e., more time prior to Initial Review) would potentially slow down an action’s timeline which may be undesirable for some Tribes, communities, and fishery stakeholders. However, National Standard 2 requires the use of the best scientific information available which includes LK and TK. Therefore, it is important to provide sufficient time (to the extent practicable) to allow analysts to fully explore the scope of information that may be available to inform Council decision-making.

Considering the current capacity constraints (e.g., analytical staff workloads and tradeoffs with Council priorities, limited funding to hire additional staff, among other considerations), the Council could consider formal partnerships (e.g., a Memorandum of Understanding) with Tribal Consortia and other organizations that have access to LK and TK or currently have social science research programs focused on fisheries. These agreements could function as data sharing agreements which could be discrete and formed for a specific issue or a standing agreement. Forming such agreements could take two to three months at the start of an action.

*Table 2* below captures the level of resources required for each onramp to be implemented. This is a somewhat subjective assessment as the level of resources are categorized as high, medium, or low. Within this context, “resources” are conceptualized as analytical staff time, time on the /Council meeting agenda, and the relative time invested from the public to understand or provide input on potential process changes.

**Table 2 Summary of onramp recommendation, resources required for implementing each onramp recommendation, and the corresponding level of staff resources required**

Onramp recommendation	Resources required for implementation	Level of staff resources required
Adopt the Protocol	<ul style="list-style-type: none"> <li>Update management policies webpage</li> </ul>	Low
Support for, and dedicated staff time to maintain, the LKTKS search engine	<ul style="list-style-type: none"> <li>Staff periodically (e.g., twice annually) update search engine with new sources</li> <li>Staff use the search engine to inform analyses, including summary of when no results were returned</li> <li>Outreach to advertise the search engine to individuals and organizations that work with LK and TK holders and/or conduct research related to LK and TK. (i.e., to facilitate a flow of new sources to the search engine)</li> </ul>	Low to medium
Initiate a process whereby Tribes could engage with the Council	<ul style="list-style-type: none"> <li>As conceptualized, staff would need to write a discussion paper outlining conceptual model for Tribal engagement based on the Council's goals</li> <li>Staff support for Community Engagement Committee</li> </ul>	High
NMFS led Consultations occur early in the decision-making process and a non-quorum of Council members participate, when invited	<ul style="list-style-type: none"> <li>Participate in Tribal Consultations as invited</li> </ul>	Low to Medium
Request Federal agencies with co-management partners extend invitations to present to Tribal partners	<ul style="list-style-type: none"> <li>Staff periodically remind agencies of the Council's intent and interest in co-managers being involved and present at presentations as able</li> </ul>	Low
Expand designated Alaska Native Tribal seats to be held by Tribal representatives across advisory bodies	<ul style="list-style-type: none"> <li>Staff write a discussion paper summarizing the backgrounds of the advisory body members</li> <li>Staff update Council SOPPs to indicate dedicated Tribal seats reserved across bodies</li> </ul>	High or low depending on preferred pathway forward
Solicit nominations for expanded LK and TK social science expertise on the SSC	<ul style="list-style-type: none"> <li>Staff write a solicitation for new SSC membership</li> </ul>	Low

Onramp recommendation	Resources required for implementation	Level of staff resources required
Workshop to solicit broad input from the public and knowledge holders during research priorities process	<ul style="list-style-type: none"> <li>• Staff work with SSC research priorities subgroup, public, and other staff for planning</li> </ul>	High
Implement template with guiding questions for LKTKS information	<ul style="list-style-type: none"> <li>• Staff add to suite of internal analytical template documents, and it may need to be updated over time</li> </ul>	Low to add template to other guidance documents, high to implement and use in analytical documents
Modify public comment procedures to allow for introductions	<ul style="list-style-type: none"> <li>• Staff update SOPPs to reflect public comment changes</li> <li>• Admin staff monitor introductions in meetings</li> </ul>	Low
Plan to increase non-economic social science capacity and LKTKS expertise more specifically	<ul style="list-style-type: none"> <li>• Staff write letter to AFSC expressing Council’s support for additional non-economic social science expertise</li> <li>• Staff support Social Sciences Planning Team</li> <li>• Staff involvement in Data Gaps Analysis</li> </ul>	Medium to high depending on preferred pathway forward

## **Appendix A      Template for working with Local Knowledge, Traditional Knowledge, and Subsistence Information**

### **1. Background**

This document contains several guiding questions that can help inform the development of discussion papers and analyses when staff identify or work with LK, TK, the social science of LK and TK, and subsistence information. This template is not intended to prescribe a narrow approach for staff, but instead provides a starting point as staff work to include these knowledge systems in products used to inform Council decision-making. This template is meant to be used in conjunction with other staff analytical templates and the LKTKS Protocol, as needed and appropriate. It is envisioned that this of questions will be modified and evolve over time as it is put into practice by analytical staff, and that responses to these questions may inform the methods for impact analysis, description of fisheries, and other sections of analytical documents. When engaging work with TK systems in particular, it is important to be mindful of whether there is appropriate expertise, training, and resources available to work with TK systems and TK holders.

### **2. Overarching questions and guidance related to LK, TK, and subsistence information**

1. Are there any known impacts to subsistence resources and their uses resulting from this action? If so, see Section 4 below.
2. Have any Tribal Consultations or engagement sessions relevant to this action occurred? If so, work with NMFS to synthesize those meetings.
3. Have staff engaged with the LKTKS Protocol to identify and describe relevant information for the analysis? (This could include a literature review or outreach as needed or appropriate.)
4. Have staff used the LKTKS search engine to identify written sources and other types of LKTKS information?
  - o Who has developed the data or information that is being reviewed by analysts? There may be different methods and approaches in use depending on the funding source and/or author.
5. How was the information and/or knowledge holders that are included in the analysis identified?

### **3. Questions and guidance related to LK and TK**

1. What kinds of information could LK and/or TK contribute to the analysis?
  - a. What chapters (e.g., EA, RIR, or SIA) or sections of the analysis would LK and TK contribute to?
2. If staff are reaching out to fishing associations, communities, or Tribes, is there a protocol for sharing knowledge in place (e.g., do crew members need permission from vessel captains to share certain information?)
  - a. If so, see guideline 5.
3. Have other definitions for LK, TK, or subsistence been provided? If so, by whom and can those alternative definitions be shared or described in the analytical document being prepared?
4. Do staff need to identify LK and TK experts?
  - a. If yes, see guideline 3 of the LKTKS Protocol. If no, why not?
  - b. Have knowledge holders been asked how, or if, they would like to be attributed?
5. How representative is the collected LK and/or TK of the action and issue of interest that is relevant to the action and/or alternatives developed by the Council?

- a. If the analysis covers a large geographic extent and affects multiple types of users, LK or TK could be published in existing formats from multiple users reflecting that diversity. If the LK or TK is NOT fully representative of the action or issue of interest, this is to be clearly noted with mention to the regions/users that have not been included.
6. Are there elements or dimensions of LK and/or TK (e.g., intangible, cultural) that do not easily fit within the current structure of analyses (i.e., description of issues and/or management impacts) that should be included in analyses?
7. How do the communities potentially affected by the action being analyzed value the resource/habitat/ecosystem/practices/etc. that are being analyzed? Do we know? What can we say about it?
8. Identify possible conflicts or omissions in the process. How might the selection of knowledge for inclusion inform or weight your findings? How are you managing bias?

#### **4. Analytical questions and guidance related to subsistence**

The following questions provide a starting point for analytical consideration while analysts evaluate the potential impacts of a Council action on subsistence uses or users of a resource. These questions represent some of the categories of impacts to subsistence that could result from Council action and decision-making.

1. Is there a long-term and consistent pattern of use and dependence on the resource for subsistence purposes?
  - a. Have there been disruptions to the pattern of use and dependence on the resource for subsistence purposes? If so, what? Disruptions may include changes beyond a gatherer's control (e.g., changes in species abundance or distribution due to climate change, regulatory changes, and more).
2. When in the calendar year is the resource being harvested?
  - a. Are there specific harvesting practices that can be described (e.g., fishing gear types)?
  - b. Are there means of handling, preparing, preserving, or storing resources that can be described?
3. What is the area where there are long-term and consistent patterns of taking and use of the resource for subsistence purposes?
  - a. Have there been disruptions to subsistence user's ability to reach an area where there are long-term and consistent patterns of taking and use of the resource for subsistence purposes?
  - b. Are subsistence gatherers or communities making adjustments to harvest other resources to compensate for a loss of resource access?
  - c. Are subsistence gatherers or communities making adjustments to harvest resources on a different pattern, timescale, or gear types in light of environmental changes?
4. Are there patterns of use that include handing down knowledge of resources, skills, values, and more across generations?
5. What is the pattern of harvesting and use where the harvested resource is shared or distributed among kin and/or communities?
6. What is the pattern of harvesting, use, or reliance for subsistence purposes that provides substantial economic, cultural, social, or nutritional elements for the subsistence way of life?