

PUBLIC TESTIMONY SIGN-UP SHEET

Agenda Item: B Reports

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15 Mark Thompson	Mark Thompson		
<input checked="" type="checkbox"/> Rose Fosdick	Kawerak, IAC		x
<input checked="" type="checkbox"/> Freddie Christiansen	OLH NAT COOP		
<input checked="" type="checkbox"/> Duncan Fields	Ouzinkie Community Holding Inc.		
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NOTE to persons providing oral or written testimony to the Council: Section 307(1)(I) of the Magnuson-Stevens Fishery Conservation and Management Act prohibits any person "to knowingly and willfully submit to a Council, the Secretary, or the Governor of a State false information (including, but not limited to, false information regarding the capacity and extent to which a United State fish processor, on an annual basis, will process a portion of the optimum yield of a fishery that will be harvested by fishing vessels of the United States) regarding any matter that the Council, Secretary, or Governor is considering in the course of carrying out this Act.

Chairman Hull and Members of the Council,

My name is Robbie Townsend Vennel and I am the Facilitator for the Kodiak Archipelago Rural Regional Leadership Forum. The Forum is a consortium of about 60 leaders who work to support the sustainability of Kodiak's small, off-road system communities of Akhiok, Karluk, Larsen Bay, Old Harbor, Ouzinkie and Port Lions. Participation in the Forum includes both residents of these small, coastal communities and forum partners such as the Kodiak Island Borough, our region's Alaska Native Corporations and others.

The Forum has an aggressive agenda that works to create collaborative work sessions between our rural residents, regional and state government, and support agencies to move forward regionally identified goals. The forum has had some substantive successes that include working with the Alaska Energy Authority to develop a comprehensive regional energy plan, supporting communities in their capital project priorities and working to revitalize local economies through projects such as the ANA small farms project that is establishing farms in Larsen Bay, Old Harbor, Ouzinkie and Port Lions to provide locally grown produce and eggs while supporting local employment. Most recently the Forum planned and facilitated a Rural Education Summit to address how best to provide a quality education to rural students in the face of rapidly declining enrollments.

But the one area where the Forum has not been successful in achieving its stated goals is the re-establishment of access to our local fisheries.

Why is that? First, it took us a while to understand what was happening. Back in 2004 when community plans were being developed survey results and community discussions indicated that the number of small boats home ported in our small, coastal communities were rapidly declining. At the same time that we were working on these community plans a young PhD student named Courtney Carothers was spending significant time doing in-depth interviews with rural fishing families. Courtney presented her preliminary findings regarding the negative impacts of fisheries policies on our communities to the Forum in 2006. None who attended that work session will ever forget when a long standing fisherman from Ouzinkie broke down and wept and struggling with his tears shared his understanding of what was happening. At that point everyone saw clearly the tragedy that was developing. That unless the ability to fully access the resource that laid outside their very door was restored, a resource that has sustained these communities for over 7,000 years as documented in the attached letter from the Alutiiq Museum, their communities would probably die.

Secondly, as we came to terms with this story, we struggled as a region and as a Forum to get our arms around political processes. In 2013, then Kodiak Island Borough Mayor Jerome Selby and Denby Lloyd worked with the Forum to develop a one-page summary of the Forum's Issues, Goals and Strategies as they relate to fisheries. Working together with others in the region such as the Koniag/KANA Roundtable, we've utilized this summary to guide our Forum work sessions and prepare testimony for meetings such as

these. But our communities simply don't have at their disposal the types of resources the more well capitalized entities deploy to influence the process.

It is important to recognize that as fisheries regulations continue to strangle economic opportunity in Kodiak's small, coastal communities, this impacts the City of Kodiak and the Kodiak Island Borough as well. We don't have studies that estimate the economic benefits contributed by our rural residents purchasing goods, services and groceries in Kodiak. But anecdotal evidence indicates that the villages contribute substantially to the overall Borough economy. As these villages continue to depopulate, often to Anchorage and Homer, the City of Kodiak is also a large loser.

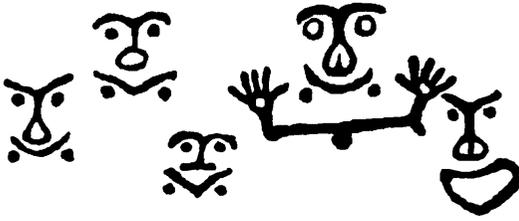
So what to do? You'll see that the Forum's Goals and Strategies closely track with the *Turning the Tide* report presented earlier. These include:

- 1. Establish fisheries policies that support the viability of coastal communities through careful consideration of the impacts on local economies, teaching and learning between generations and community health and well-being.**
- 2. Making what we currently have work. Don't lose any more ground.** Work to reduce the cost of entry for our young fishermen, maximize the effectiveness of community quota entities and encourage young people through well-defined apprenticeship pathways.
- 3. And finally, improve fisheries management, particularly in regard to critical keystone species such as halibut.**

The Forum very much appreciates that the Council invited Dr. Carothers to present on the findings from "*Turning the Tide.*" We stand ready to work with the Council to identify and implement solutions that will help to restore fisheries access to our coastal communities. And we would welcome the members of the Council to be guests of the Forum at some future date where we could together explore possibilities.

Thank you.

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March 31st, 2014

Dr. Amber Himes-Cornell, Social Scientist
NOAA Fisheries
Alaska Fisheries Science Center
7600 Sand Point Way NE
Seattle, WA 98115

Dear Dr. Himes-Cornell,

On behalf of the Alutiiq Museum, we are writing to share our concerns regarding NOAA's current community fisheries research project in Alaska's Kodiak Archipelago. We work for the Alutiiq Museum, a nationally accredited museum dedicated to preserving and sharing the culture and heritage of the Alutiiq people. In these pursuits we strive to provide an accurate view of Kodiak history and maintain an active research program that includes archaeological investigation. As professional researchers with detailed knowledge of Kodiak history, we have concerns with the information presented in the community profiles NOAA drafted and the very limited historical context they establish.

First, we are concerned with the quality of historic information presented in NOAA's regional and community profiles. In reading NOAA Technical Memorandum NMFS-AFSC-259, *Community Profiles for North Pacific Fisheries – Alaska*, Volume 5 (Himes et al., 2013), we note a variety of errors and inconsistencies. While it was not our intent to provide a comprehensive review of the document, in our review of the parts pertaining to communities' history, we found numerous inaccuracies that indicate that the study relies on surface level research. Here are a few examples;

- (P2) Alitak Bay is not a contemporary community. There is no contemporary community of this name in the location shown on the map on page 1, and to our knowledge the locale indicated was not home to an historic community. Lazy Bay, on the opposite shore of Alitak Bay, south of the community of Akhiok, is home to the Ocean Beauty cannery. The cannery sits in a spot unofficially known as Alitak, Alaska. As such, Alitak should be removed from the list of communities. Or, if the community profiles are to include remote business sites (canneries, logging camps, lodges) there are many others that should be added, e.g., Danger Bay.
- (P2) Freezing weather is very common in the Kodiak region in winter, not rare as cited throughout the document.
- (P3,19) The terms Alutiiq, Aleut, and Koniag are incorrectly interpreted in multiple places. The traditional term for the people, prior to Russian contact was Sugpiaq not Aleut. Russian traders introduced the term Aleut and used it to describe all coastal people from the Aleutian Island, to Kodiak, and to Bristol Bay regardless of their cultural heritages. The term Aleut comes from a Siberian Native language and means coastal dweller. In the Native language of Kodiak, the term

Aleut is said as "Alutiiq." The term Alutiiq has been used since Russian times, not since the 1980s. Alutiiq is a popular self-designator on Kodiak, but not elsewhere in the Sugpiaq world as suggested by the text. Similarly, the term Koniag is not used as a self-designator. It shouldn't be used to describe the people (e.g., P19 "The Koniags historically. . ."). It is a term archaeologists adopted in describing the late prehistoric way of life – the "Koniag tradition." It is also name of the regional ANCSA corporation – Koniag, Inc.

- (P4) The 1964 earthquake did not destroy the canneries on Karluk spit. Although the quake was felt in Karluk, geological studies and oral histories record that the sea level rose only slightly. The situation is more accurately portrayed in the community profile for Karluk (P40).
- (P38) The review of Karluk history is outdated. More than 100 archaeological sites are known in the Karluk River drainage, dating to the past 6,000 years of prehistory. Also, Nunakakhnak was a resettlement village, established by Russians traders after the 1837 small pox epidemic to consolidate survivors from the western coast of Kodiak Island. It was not located on both sides of the river, but on the western shore of the inner lagoon, just north of the modern village.
- (P40) The explosion of the Katmai volcano in 1912 only covered a portion of the Kodiak Archipelago, the northern half, in volcanic ash. Places like Karluk, on the southwestern end of Kodiak Island, received only a dusting, and experienced no significant fisheries impacts.
- (P47, P60) Marine birds are omitted from the discussion of subsistence, but were an essential resource for Alutiiq people, particularly in Karluk. Birds were the central source of hides for clothing.
- (P67) Estimates of the size of the Native population at the time of Russian conquest vary widely in the report – compare to P3 @ 6,500 to P67 @ 8,000.

These are just a sample of the inaccuracies. Some of these errors could have been avoided by consulting original research, spending adequate time in the archipelago, or arranging for a review by a local historian. A substantial number of the citations to historical information are from secondary sources. Moreover, the original sources cited are relatively old, and no longer reflect the current state of knowledge. We note, for example, that the profiles cite the short historical summary provided in the Alutiiq Ethnographic Bibliography (1995), rather than the actual references cited in the bibliography. As the community profiles are a foundational part of NOAA's research process, we urge you to correct them. Consultation of original, recent reference material, evaluation by a local historian, and review by leaders in each community would help to improve their accuracy. This will require direct communication with informants, rather than only a mail out survey or a mailed draft to request edits. Through our discussions with the Kodiak Rural Regional Leadership Forum, we understand that they have also requested use of more community-responsive research methods.

Second, in efforts to capture a snap shot of Kodiak fishing practices, NOAA's research has not fully considered the broader historical context of fishing on Kodiak, including neither pre-contact history of fisheries, nor the economic and social impacts of the Exxon Valdez Oil Spill, or the effects of regulatory policies over the past 30 years that have significantly altered local commercial and subsistence fishing. While the community profiles note the >7,000 year history of the Kodiak Alutiiq people, they do not use this well documented record as a foundation for understanding the evolution of fishing practices nor the deep-root cultural significance of sustained engagement with marine resources. There is just one grossly simplified paragraph on prehistoric fishing practices. Yet, archaeological data demonstrate that fish were a foundational resource, one that increased in economic importance with the evolution of Alutiiq culture. With every major environmental and demographic change, Alutiiq people turned to fish,

harvesting both marine and anadromous species with greater intensity and efficiency to meet economic needs. A brief review of Kodiak prehistory illustrates this trend.

Kodiak's first people arrived in the archipelago bearing a fully maritime culture. Researchers believe they came from the west, and were skilled at both ocean travel and harvesting. In order to reach the islands, people had to have sea worthy boats. In order to thrive on the islands they had to harvest effectively from the ocean. The earliest sites from the region include evidence of deep sea fishing – hooks and weights similar in design to those used by modern sport fishermen to capture halibut. Studies of the fish remains from ancient garbage at the Rice Ridge site suggest that their target was cod. Other fish remains are also present, indicating that Kodiak's earliest residents consistently harvested sculpin, flat fish, and herring. People harvested ocean fish from small coastal communities. Recent research suggests that small family groups lived in small settlements adjacent to key harvesting areas, for perhaps several months at a time.

Salmon bones are also present in early sites, but grow more abundant through time. Archaeologists suggest that as salmon populations grew and runs stabilized, anadromous fish gained economic importance. Across Kodiak sites ca. 6,000 – 4,500 years old appear along the banks of salmon streams, particularly in the places best suited to intersect salmon – river mouths, the banks of lagoons, and lake outlets. Kodiak's early settlers pursued salmon from repeatedly visited streamside camps. Harvesting focused on the capture of individual fish with ground slate spears, probably by people standing in the water. Broken and blunted spears, and tools for their production abound in streamside camps, illustrating the manufacture, use, and repair of fishing spears.

By about 4,000 years ago, fishing practices and the use of fish began to change dramatically. Archaeological sites indicate that people began to harvest fish in greater quantity, from larger, more permanent communities. Why? By this time, the archipelago's climate had cooled substantially, creating stormier weather, less predictable open water hunting and fishing, and pressure to store quantities of food. Also, archaeologists believe that the landscape was beginning to fill with people, limiting opportunities to move broadly in search of food and natural resources. Studies of sea mammal remains suggest that hunting pressure reduced the availability of seals. To feed their families, people harvested greater quantities of fish. This included both marine fish and salmon. At the Horseshoe Cove site on Uganik Island, people harvested huge quantities of cod from Shelikof Strait. Ancient garbage from the site is composed almost exclusively of cod bones, butchering tools, and dumps of charcoal and burned rock. The charcoal and rock suggests that people were heating stone to dry their catch and building smoky fires to keep insects away, an idea supported by excavations at Zaimka Mound in Womens Bay. Here archaeologists found pits filled with wood charcoal and heat holding gravel. People appear to have dried foods over these pits, to preserve their catch.

Salmon were also harvested in quantity, but with a new technology. About 4,000 years ago, Alutiiq people began to fish with nets – focusing harvests on schools of fish rather than individual animals. This mass capture technology also resulted in the need for a better processing tool. Ground slate ulu blades begin to appear in Kodiak sites at this time. These knives were more easily sharpened, an important consideration for people cleaning many fish. Like cod, salmon were dried for preservation. Special structures filled with fire pits and postholes indicate that people were hanging fish on racks in covered, heated buildings to dry. Capturing, processing, and drying quantities of fish suggests that people were storing quantities of food for winter use. As the economic focus shifted more heavily toward fish,

people took advantage of the surplus abundance of summer fish to stockpile food for Kodiak's cold, dark, stormy winter season. Based on the locations of sites and indicators of seasonality, archaeologists suggest that people focused on harvesting red and silver salmon.

By about 2,500 years ago, Alutiiq people were living in large, relatively permanent coastal communities. The increased harvest of fish seems to have reduced settlement mobility. Food stores can make it hard to move, as people don't want to leave their stores behind and risk losing them. Storage sheds appear in villages at this time, perhaps to hold quantities of stored foods. Moreover, people begin to build more permanent camps in streamside settings. At this time, archaeologists believe that people moved seasonally from long-term villages occupied through most of the year to seasonal fish camps on salmon streams. Sites along the interior stretches of Kodiak's major anadromous streams have settlements with clusters of well-built sod houses. These are likely places to which people returned over and over. By this time, fish were also likely a trade item, as they still are today. Multiple classes of archaeological data indicate that the Kodiak landscape was filled with people and that territorial control was developing. When people cannot move their settlements, they begin limiting access to traditional harvesting areas and moving goods. Evidence of trade with the Alaskan mainland and with other parts of Kodiak is common and illustrates both the increasing population of the islands as well as the growing demand for natural resources.

About 900 years ago, the focus on salmon intensified again. This was also a time of environmental cooling in the Gulf of Alaska, and a period where other regions experienced declines in human settlement. On Kodiak, however, settlement intensified, especially along major salmon streams. Here, archaeologists find enormous settlements, filled with houses. Extended families began working together and living in small multi-roomed houses. People began to control their food stores more carefully, moving food processing and storage into the safety of their homes. Excavations of an early multi-roomed house in the Olga Lakes area illustrates that food processing activities took place in the main room of the house with people sleeping in two tiny side rooms.

The development of communal houses continued in the succeeding centuries. By about 600 years ago, groups of Alutiiq families were living in very large multi-roomed houses in large villages occupied for much of the year. At the Settlement Point site of Afognak Island, the large central rooms of houses are filled with hearths, storage pits, and roasting pits where food was processed, prepared, and kept. Surrounding the central room were a series of small sleeping chambers, similar to older houses. Here related families essentially arranged their houses around a covered courtyard to care for jointly harvested food stores.

At this time, there appears to have been regional economic specialization. For example villages along the eastern coast of Kodiak hunted whales extensively, while those on southwest Kodiak harvested massive quantities of fish. Trade between the two regions likely moved surpluses between communities with different economic focuses. At this time, there appear to have been both fishing camps and permanent winter villages along the inland courses of salmon streams. The final prehistoric intensification of fishing, therefore, was permanent settlement of the banks of salmon stream, and the broadest possible use of salmon species including pink and dog salmon.

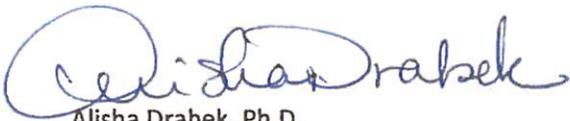
When Russian traders arrived in the Kodiak region in the late 18th century they found large, complexly organized Alutiiq communities lead by wealthy chiefs. These community leaders maintained their

positions through their ability to harness labor to harvest resources. Chiefs owned slaves, captives from other communities or cultures, specifically for the purpose of accumulating resources like fish. They also traveled, traded, and raided over extremely long distances to bring food and valuables home. Dried fish were among the goods commonly seized in village raids.

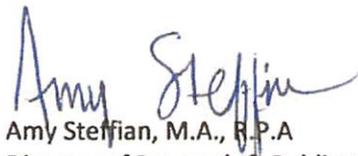
This broad overview illustrates the detailed historical context available for understanding the development of fishing traditions on Kodiak, as well as the focal importance of fish to local economies. As sea mammals became less accessible, as the Alutiiq population climbed, and as settlement mobility was curtailed, people increased their use of fish. People solved societal problems with fishing. They developed new harvesting and processing technology to capture fish in quantity and to preserve them for future use. This led to increased food storage, reduced settlement movement, larger communities, more trade, and ultimately the need to harvest resources with increasing efficiency and intensity. Fish were the resource that fueled Alutiiq economies. We believe this information should be reflected in NOAA's research. Kodiak's current fishing economy is directly influenced by this history and the Alutiiq traditions that grew in close connection with marine resources.

We thank NOAA for its consideration and for its willingness to consult the Kodiak community as part of its study. We now urge NOAA to embrace community input to ensure that your research is built on as firm a foundation as possible. We recognize the great importance of managing Alaska's fisheries, as well as the need for scientific studies to support management efforts. However, such studies need to be based on the best information possible and responsive to the people whose lives the research will impact. We believe that NOAA has not yet incorporated solid historical data from Kodiak in its current research effort.

Respectfully,

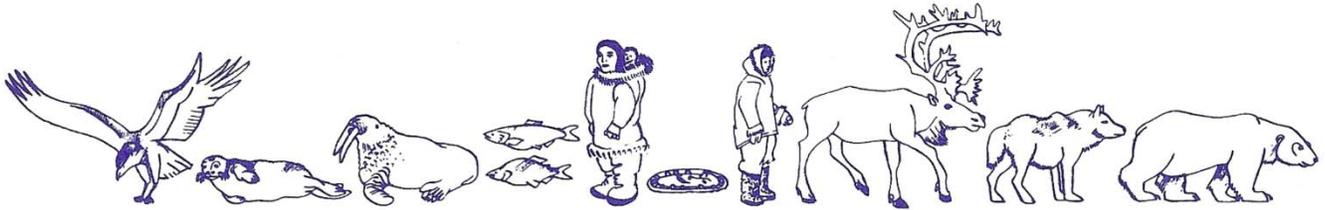


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- cc. The Honorable Mark Begich, U.S. Senator for Alaska
The Honorable Lisa Murkowski, U.S. Senator for Alaska
The Honorable Gary Stevens, Alaska State Senator for Kodiak
The Honorable Alan Austerman, Alaska State Representative for Kodiak
Dr. Courtney Carothers, University of Alaska Fairbanks
Kodiak Archipelago Rural Regional Leadership Forum



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June 2, 2018

To: North Pacific Fishery Management Council
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(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.



Bering Sea Elders Group

June 1, 2018

North Pacific Fishery Management Council
605 W. 4th Avenue, Suite 306
Anchorage, AK 99501

Re: Agenda Items B-1 Ecosystem Workshop and D-2 Community Engagement

Dear Council members,

The Bering Sea Elders Group (BSEG) respectfully submits these comments on the June 2018 Working Draft of the Ecosystem Research Workshop Summary and Workshop Discussion Guide and Community Engagement Committee Scope. We are not providing comments at this time specifically on the Community Engagement paper because it was not available on the Council's website in time for us to provide comments. With that in mind, we encourage the Council to consider the following points.

First, BSEG thanks you again for the opportunity to take part in the Ecosystem Research Workshop earlier this year in Seattle. We found the opportunity to share ecosystem observations and concerns in an open dialog extremely valuable. **We encourage the Council to hold this type of inclusive ecosystem workshop as an annual event.**

Second, **we encourage the Council to continue and expand the current opportunities for community and tribal engagement in Council Committees and advisory bodies.** This includes the Ecosystem Committee continuing to welcome community participation when there is discussion of issues impacting their community. This also includes tribal membership and representation on the Council's Committees, including the Ecosystem Committee and Advisory Panel. Direct membership on Council Committees and Plan Teams is one of the best ways to ensure engagement. Therefore the Council should include tribal membership on all Council committees and Plan Teams.

Third, **we encourage the Council to continue to develop additional opportunities for two-way engagement,** as per the discussion under agenda item D-2. As we have previously stated, BSEG is eager to broaden the opportunity for community involvement at Council and committee meetings. We believe it is important for affected communities to have regular input as part of the Council's process. BSEG encourages the Council to commit to an inclusive process that lets affected communities meaningfully participate in the Council and committee meetings. BSEG understands and appreciates the reality that Council meetings have full agendas, but we encourage the Council to incorporate community feedback in a way that does not put strict time limitations on community comments. We would welcome engaging the Council on ways to accomplish this. To this end, **we support the establishment of a new committee dedicated to**

Alaska Native and rural community engagement. This should be a new committee—not a reconstitution of the rural outreach committee—with a focus on two-way engagement. Membership should include tribal representatives and people with expertise in working with communities in tribes. We recommend this committee scopes ideas, rather than an open-ended request for proposals.

The Community engagement work should be in addition to the Council's current outreach work. Developing a multi-faceted approach to community engagement and outreach is key because of the reality that for many of our people, attending Council meetings is a financial hardship. For those of us who live in rural Alaska, traveling to the Council meetings is often prohibitively expensive. It requires not only the funds to pay for airfare and hotel, but also substantial time away from our traditional subsistence practices. In short, we must take time away from feeding our families in order to advocate for our ability to feed our families. Therefore, it continues to be important to have Council members travel to communities and engage directly with a broad cross-section of community and tribal members, many of whom cannot travel to Anchorage.

And finally, **BSEG recommends that the Council create a plan for ensuring that traditional knowledge informs Council documents and decisions.** There is a large volume of Traditional Knowledge that has been documented from Northern Bering Sea communities that is relevant to the Council. BSEG and others would welcome the opportunity to work with the Council to ensure that such knowledge appropriately informs Council processes. We understand that the Bering Sea FEP core document, as well as action modules, may provide this opportunity and we strongly encourage the Council to move forward in this direction. BSEG believes that collaboration and exchange of knowledge will lead to stronger management information and informed decisions. Furthermore, towards that end, BSEG again recommends that the Council consider a co-production of knowledge approach that brings together both science and Traditional Knowledge through an equitable process.¹

BSEG thanks you for your continued work and we look forward to building a more robust relationship between the Council and our communities.

Quyana,



Mellisa Heflin
Bering Sea Elders Group

¹ Behe, C., R. Daniel, and J. Raymond-Yakoubian. 2018. Understanding the Arctic through a co-production of knowledge approach. Workshop at the Alaska Marine Science Symposium, Anchorage, Alaska, January 23-24, 2018.