



North Pacific Fishery Management Council

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Ms. Janet Coit
Assistant Administrator, NOAA Fisheries
1315 East-West Highway
Silver Spring, MD 20910
Via email: janet.coit@noaa.gov

Dear Ms. Coit:

On behalf of the North Pacific Fishery Management Council (Council), I thank you for the opportunity to comment on the National Oceanic and Atmospheric Administration (NOAA) Fisheries' Draft Equity and Environmental Justice (EEJ) Strategy. It is the Council's understanding that the Draft EEJ Strategy was developed by the NOAA Fisheries Working Group in response to Executive Orders 13985 and 14008 promoting EEJ within the Federal government and its external-facing efforts. The Draft EEJ Strategy provides guidance for incorporating and prioritizing EEJ in ongoing and future activities with three primary goals in mind: 1) prioritizing the identification, equitable treatment, and meaningful involvement of underserved communities; 2) providing equitable delivery of services; and 3) prioritizing EEJ in the agency's mission and work. Upon review of the Draft EEJ Strategy, and in response to the agency's call for public comment, the Council supports the Draft EEJ Strategy and feels the goals, objectives, and recommendations for action are on target. As such, the Council offers the following regionally specific input.

Alaska is home to 229 Tribes, many of which are engaged in or dependent on Federally managed fisheries. There are numerous rural communities across Alaska that are disconnected from the road system and the people that reside within them depend on subsistence harvest rooted in tradition for food security, cultural continuity, resilience, and wellbeing. However, the North Pacific and Arctic are undergoing substantial ecological and climatological shifts (i.e., marine heat waves, harmful algal blooms, seabird die-offs, unusual mortality events in marine mammal populations, and more) which directly impact Alaska Tribes and communities. These environmental changes pose challenges that are increasingly difficult to predict, and the Council recognizes there are important EEJ implications for communities that may already be, or become more, vulnerable to climate change.

The Council supports all six core areas and the corresponding objectives in the Draft EEJ Strategy (see Table 1, ES). However, in relation to climate change, the Council supports the core area of research and monitoring for equity to achieve the objective of identifying underserved communities, addressing their needs, and assessing the impacts of management decisions (pg. 14). Each action related to this core area and objective outlined in Table 4 could make a valuable contribution to furthering NOAA Fisheries' mission and broader EEJ efforts (pg. 15). In particular, the Council supports actions 2, 3, 4 and 8 that prioritize social, cultural, economic, and demographic research to identify and characterize underserved communities, include Local Knowledge and Traditional Knowledge into fisheries, climate, and ecosystem-based science, as well as research on the consumption patterns of communities who principally rely on fish and/or wildlife.

These actions are relevant well beyond the North Pacific and could support all Regional Fishery Management Councils in being more responsive to National Standards 2 and 8 of the Magnuson-Stevens Fishery Management and Conservation Act.

Additionally, the Council supports the objective of building relationships with underserved communities to better understand their needs and improve information sharing with all Tribes and stakeholders (see Table 5, pg. 19-20). This objective is closely linked to that of enabling the meaningful involvement of underserved communities in the decision-making process (pg. 23). Improving the accessibility of public meetings, documents, and the decision-making process can increase the diversity of public comments and support NOAA Fisheries and the Regional Fishery Management Councils in identifying potentially underserved communities. To the extent practicable, NOAA Fisheries could consider travel support via direct funding or scholarships for underserved communities or their representatives to participate in meetings. This action is directly related to several core areas and objectives described in the Draft EEJ Strategy and it could increase access to decision-making for underserved communities and lessen some of the logistical challenges to participating in these processes.

Finally, the Council recognizes that NOAA Fisheries and the Regional Fishery Management Councils serve diverse Tribes, communities, and stakeholders. Inclusive governance could be better achieved by including diverse representation on various advisory bodies. One way the Council has used this approach is through its Community Engagement Committee which was authorized in 2018 to recommend strategies for the Council to effectively carry out two-way communication and engagement with Alaska Native and rural communities. Advisory bodies like committees can support diverse participation in the public process and build partnerships for identifying potentially underserved communities as well as options for reducing the barriers they face to engaging in decision-making processes (see Tables 5 pg. 19-20 and 7 pg. 24-25).

The Council appreciates that the Draft EEJ Strategy includes step-down implementation plans that are region and program specific, and we look forward to working with our regional partners as they create and implement their plans. Again, we appreciate the opportunity to provide comment.

Sincerely,



Simon Kinneen
Council Chair