



September 22, 2023

Simon Kinneen, Chairman
North Pacific Fishery Management Council
605 West 4th Avenue, Suite 306
Anchorage, AK 99501

Jon Kurland, Regional Director
NOAA Fisheries, Alaska Region
PO Box 21688
Juneau, AK 99802

Re: D1 Local Knowledge, Traditional Knowledge, and Subsistence Protocol Recommendations

Dear Chairman Kinneen, Director Kurland, and Council Members,

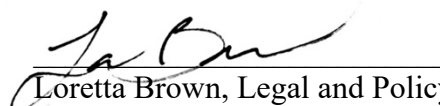
SalmonState submits these comments again in support of the Local Knowledge, Traditional Knowledge, and Subsistence Protocol developed by the LKTKS Taskforce and presented to the North Pacific Fishery Management Council.

SalmonState is an Alaska based and Alaska focused project supporting innovative and effective public interest projects. SalmonState works within Alaska to guarantee Alaska remains a Salmon State by protecting and preserving habitat and promoting fish first policies for this irreplaceable resource. SalmonState works alongside other Alaska organizations, commercial fishers, sport and recreational fishing guides and enthusiasts, salmon dependent businesses, and Alaska Native groups to maintain sustainable commercial, sport, and subsistence fisheries.

The Protocol was developed through an inclusive and collaborative process and has resulted in informed guidance for incorporation of traditional knowledge, local knowledge, and subsistence information in federal fisheries management. In particular, the Alaska Native representation in the development of the Protocol has been severely lacking in the Council decision processes, and implementation of the Protocol's framework for incorporating traditional and local knowledge through respect, identifying, and including Alaska Native and community members who hold knowledge is necessary to guide the Council and NMFS in more equitable and informed decision-making.

SalmonState requests NPFMC adopt and implement the Local Knowledge, Traditional Knowledge, and Subsistence Protocol without delay at this October 2023 Council meeting. Implementation of the Protocol is imperative to establishing more equity and more informed decisions by the Council and NMFS in the North Pacific federal fisheries management region. Thank you for your prompt attention and decision on this matter. Thank you for providing the opportunity to comment on this important issue in front of the Council and NMFS.

Sincerely,


Loretta Brown, Legal and Policy Analyst

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