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January 24, 2017

Dr. James Balsiger, Regional Administrator  
NOAA Fisheries, Alaska Region  
709 West Ninth Street  
Juneau, AK 99802-1668

Mr. Dan Hull, Chair  
North Pacific Fishery Management Council  
605 W. 4th Avenue, Suite 306  
Anchorage, AK 99501-2252

RE: Essential Fish Habitat public review, Staff Tasking

Dear Dr. Balsiger, Mr. Hull, and Council members:

Oceana is concerned that the North Pacific Fishery Management Council (Council) process related to the five-year review of Essential Fish Habitat (EFH) may move forward without meaningful opportunity for public review. Currently, the Council has scheduled for its April meeting initial review and tentative final action related to this review. This review includes changes to the text descriptions of EFH, the model used to depict it graphically, and possibly a new model for the impacts of fishing on EFH. These changes may significantly affect habitat protections and the fish resources dependent on them.

The public, however, has not been provided information about the scope of changes that may be put in place, the process the Council will use, or the manner in which the agency will ensure compliance with the National Environmental Policy Act. Without adequate time to review the information, the public cannot participate meaningfully in the Council process.

We encourage the Council to use its April meeting for an initial review of the EFH process and to set a schedule from there for its completion. We look forward to working with you in this process.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan J. Murray". The signature is fluid and cursive, written over a white background.

Susan Murray  
Deputy Vice President, Pacific  
Oceana



January 24, 2017

Dan Hull, Chairman  
Chris Oliver, Executive Director  
Steve Maclean, Protected Resources Coordinator  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska, 99501

**Re: TDX Comments for North Pacific Fishery Management Council’s Meeting  
Beginning January 30, 2017, Agenda Item E-1 (Staff Tasking).**

Dear Chairman Hull,

Tanadgusix Corporation (“TDX”), the Alaska Native Village Corporation for St. Paul Island, strongly supports the recommendations of the Scientific and Statistical Committee (“SSC”) contained in its Draft Report to the North Pacific Fishery Management Council dated December 10, 2016 (“SSC Report”) designed to improve the Council’s basis for decision-making related to the declining Northern Fur Seal stock.

The viability of the Northern Fur Seal population is of grave concern to TDX. The Pribilofs are home to the largest breeding grounds for Northern Fur Seals in the world. In 2010, the Pribilof Islands’ Northern Fur Seal population accounted for about 566,000 of the estimated 671,000 stocks for all Northern Fur Seals breeding in the United States.<sup>1</sup> The Northern Fur Seal has been extremely important to the history, culture and subsistence needs of the Aleut people who live on St. Paul Island for many years.

Indisputably, the Pribilof Islands’ Northern Fur Seal population is in serious decline. According to the Alaska Fisheries Science Center’s National Marine Mammal Laboratory’s 2013 analyses, the Northern Fur Seal pup production decreased a staggering 4.8% annually from 1998 to 2012.<sup>2</sup> A documented decrease of about 65% of adult males on St. Paul Island (from around

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<sup>1</sup> Testa, J. W. (editor). Fur seal investigations, 2010-2011, U.S. Dep. Commerce, NOAA Tech. Memo. NMFS-AFSC-241, 77 p. 13 (2012).

<sup>2</sup> Rod Towell, Rolf Ream, John Bengtson and Jeremy Sterling, “2012 Northern Fur Seal pup production and adult male counts on the Pribilof Islands, Alaska,” Alaska Fisheries Science Center National Marine Mammal Laboratory, pp 4-5 (2013). (“Science Center 2013 Report”)



20,000 in 1992 to around 7,000 in 2012) is equally alarming.<sup>3</sup> The Eastern Pacific stock was at 666,000 animals in 2012, down from a historic high of 2.1 million in the late 1940's to early 1950's.<sup>4</sup> More recent data may show even further depletion. These declines are extremely serious, and must be fully tracked and investigated.

TDX has urged the Council to address the dramatic decline in the Northern Fur Seal population in multiple comments. For example, TDX has asked that tracking studies and other measures be initiated to gather data on Northern Fur Seal foraging patterns in the Pribilof and Zhemchug Canyons. TDX has also strongly supported the Council's ecosystem management approach because it encompasses marine mammals' role in the fisheries ecosystem.

In its Report, the SSC discusses the Marine Mammal Laboratory's failure to provide fur seal pup count data on a timely basis and recommends that the Laboratory engage more proactively in collaborating with the Council on management and protection of these marine mammals. The SSC states:

If the Council and the National Marine Fisheries Service are to manage fisheries to protect these marine mammal species, then the Marine Mammal Laboratory will have to become more proactive in providing information and in collaborating with the Council in the management and protection of these marine mammals stocks. A useful starting place would be for the Marine Mammal Laboratory to contribute more fulsomely to the relevant annual Ecosystem Considerations chapters for instance by providing the biennial pup counts in time for inclusion in this document.<sup>5</sup>

TDX asks that the Council encourage the Marine Mammal Laboratory, in the strongest possible way, to take the steps that SSC advises. It is imperative that the Marine Mammal Laboratory provide the data that regulators need, so that they may develop the most effective policies and rules. The Marine Mammal Laboratory is renowned for its scientific expertise and data collection capabilities. It has the ability to make the important contribution that the SSC requests, if it treats addressing the Northern Fur Seal decline among its highest marine mammal priorities. If the Lab needs funding for this purpose, is short on staff, or has some other issue that prevents it from full cooperation, it should provide this information and seek assistance.

The Council should add its powerful voice to the SSC recommendations, consistent with its Ecosystem Vision Statement and its Ecosystem-Based fishery management policies. The Vision Statement recognizes that for fisheries to be sustainable, they must be maintained by resilient habitats and ecosystems that support robust marine mammal populations, among other objectives. The Statement also describes the policy's intent that Council fishery management measures explicitly take into account ecosystem components and be based on the best available

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<sup>3</sup> *Id.*

<sup>4</sup> *Id.*

<sup>5</sup> SSC Report, p. 44.



science. The Northern Fur Seal, as a top predator in the Bering Sea area, can serve as a true indicator species for the health of the entire food web. The species' serious decline could reflect more pervasive problems in the surrounding ecosystem.

For these reasons, the Council should support this provision of the SSC Report and strongly encourage the Marine Mammal Laboratory to take the actions that the SSC recommends.

Thank you very much for your consideration of this issue.

Sincerely,

A handwritten signature in blue ink that reads 'Ron Philemonoff'.

Ron Philemonoff  
Chief Executive Officer

cc: Members of the NPFMC  
Douglas DeMaster, Director, Alaska Fisheries Science Center  
Tom Gelatt, Director of Alaska Ecosystem of National Marine Mammal Laboratory

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