



January 28, 2014

Chairman Eric Olson  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501

Via electronic mail: [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

**Re: Agenda Item D-1 Ecosystem Vision Statement**

Dear Chairman Olson:

The Tanadgusix Corporation (“TDX”), the Alaska Native Village Corporation for St. Paul Island, offers these comments on the Ecosystem Committee’s draft Ecosystem Vision Statement.

TDX supports the Council’s adoption of the draft Ecosystem Vision Statement. 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 well, that Council fishery management measures explicitly take into account ecosystem components and be based on the best available science.

A science-based ecosystem approach will allow the Council to evaluate potential impacts of its management policies more broadly, and also, back its decisions with more hard science. For example, the Council’s analysis of Bering Sea Canyon protection measures has focused so far on protection of coral, a key feature of sea floor habitat. While coral is important, it should not necessarily be viewed as a key driver of the policy. The Northern Fur Seal, a top predator in the 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.

The Pribilof Islands’ Northern Fur Seal population was designated as “depleted” in 1998 because it had declined more than 50% since the 1950’s. According to the National Marine Mammal Laboratory of NOAA’s Alaska Fisheries Science Center, the Pribilof population has continued to decline 4.8% per year from 1998-2012. The Eastern Pacific stock was at 666,000

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animals in 2012, down from a historic high of 2.1 million in the late 1940's to early 1950's.<sup>1</sup> The Canyons provide important foraging areas to the Northern Fur Seal, and in particular, serve as a more reliable and secure foraging area for one critical element for long term survival: mother fur seals nursing their young.

By applying an ecosystem-based approach to Being Sea Canyons protection measures, the Council can look at other pressing issues in the area as well as coral. It can develop scientific data to evaluate potential impacts of its policies on the Northern Fur Seal, to make sure that measures it adopts do not have unintended consequences of exacerbating the decline further. As the Council's Vision Statement says, it can analyze tradeoffs, and mitigate threats to this severely depleted population.

TDX recognizes that the Canyons also provide important fishing areas to its local residents and the fleet at large. An ecosystem based management approach should weigh this interest strongly, as it evaluates protective measures. If the Council decides to place any limits on trawl fisheries, the ecosystem approach can help guide it to adopt more targeted, creative management tools. For example, if the Council gathers more data on Northern Fur Seal foraging behavior in the Canyons, it can identify key foraging areas more precisely, and minimize impacts to these areas during the Northern Fur Seal foraging period (April – October).

TDX appreciates the Council's interest in involving communities in this process, and its valuing of traditional knowledge as a basis for informing its decision-making.

Regards,



Ron G. Philemonoff  
Chief Executive Officer

cc: Members of the NPFMC  
Douglas DeMaster, Director, Alaska Fisheries Science Center

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<sup>1</sup> Rod Towell, Rolf Ream, John Bengston 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).



January 28, 2014

Mr. Eric Olson, Chair  
North Pacific Fishery Management Council  
605 W. Fourth Avenue, Suite 306  
Anchorage, AK 99501-2252

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

Re: Agenda Item D-1, Ecosystem Approach Vision Statement

Dear Chairman Olson, Dr. Balsiger, and Council Members:

We commend you for moving forward with a comprehensive Ecosystem Vision Statement. Implicit in many of the NPFMC's actions over the years is a recognition of a broader responsibility than goes beyond single-species management for the federal fisheries. We appreciate your leadership to capture this vision and provide a path forward.

With regard to the Implementation Strategy, we suggest the following mechanisms include, but are not limited to:

- Revisions to the Programmatic Supplemental Environmental Impact Statement
- Assessing interactions between the fisheries and the ecosystems and developing a framework of indicators for monitoring those interactions
- Development of Fishery Ecosystem Plans that can both inform and prompt management responses in the Fishery Management Plans
- Analysis of tradeoffs of fishery management decisions and greater consideration of mitigation measures
- Protection of representative habitats including canyons and Essential Fish Habitat
- Consideration of food web and predator needs during fishery quota setting
- Development of long-term scientific control areas for ecosystem monitoring

Thank you, we will continue to work with you to maintain and enhance the progressive and innovative reputation of the NPFMC as leaders in fisheries management.

Sincerely,

A handwritten signature in black ink, appearing to read "Susan J. Murray", is written over a light blue horizontal line.

Susan Murray  
Deputy Vice President, Pacific  
Oceana

From the Desk of  
Karin Holser  
Box 938  
St. George Island, AK 99501

26 January 2014

Chairman Eric Olson  
North Pacific Fishery Management Council  
605 W. 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501

Via US Mail and email: [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)

**Re: Agenda Item D-1 Ecosystem Vision Statement**

Dear Chairman Olson:

I would like to provide these comments on the Ecosystem Committee's draft Ecosystem Vision Statement. I support the process of developing an Ecosystem Vision Statement and we appreciate this opportunity to submit our input at this stage in the process.

I testified at the last council meeting and would like to reiterate that the ecosystem includes all predators and if you are serious about doing ecosystem based management and want sustainable fisheries then you have to start including humans as a top predator as has been shown by Dr. Charles Fowler of the National Marine Mammal Lab. This combined with climate change and ocean acidification will indeed require some big changes in the way you currently manage the fisheries, but will provide a much healthier ecosystem and will ensure that the next generation will also be fortunate as we are to have such good fish to eat.

Community based fisheries for economic and food security is essential and if humans are calculated into the equation then you are not going to have a sustainable fishery. I therefore encourage to also look at the following as part of this vision for ecosystem management.

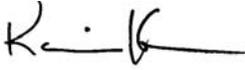
Prioritize: rebuilding species in decline by more vigorously identifying and protecting essential fish habitat for fish and invertebrates, including waters important for lesser known planktonic stages of their life history.

Prioritize: rebuilding NFS populations through improving stewardship of their key foraging areas, particularly for nursing females. As was identified in the first international marine protected area signed into law in 1911 at the Parisian Tribunal, the 60-mile zone around the Pribilof Island archipelago is a *subset* of the most important habitat for NFS.

Addressing needs for this high trophic level predator by protecting the required prey field and minimizing disturbance of those waters is essential for rebuilding!

Thank you for considering our comments on the vision statement. Please contact me at any time regarding our input on this important subject.

Sincerely,

A handwritten signature in black ink, appearing to be 'K. Holser', with a horizontal line extending to the right.

Karin Holser