MARINE MAMMAL COMMISSION

19 November 2014

Mr. Jon Kurland
Assistant Regional Administrator
Protected Resources Division
Alaska Region
National Marine Fisheries Service
P.O. Box 21668
Juneau, AK 99802-1668

Attn: Kim Rivera, Docket Number: NOAA–NMFS–2014–0123

Dear Mr. Kurland:

On 8 October 2014, the National Marine Fisheries Service (NMFS) requested comments on research funding priorities for a proposed competitive assistance program addressing the conservation and recovery of Alaska pinnipeds – the Alaska Pinniped Research Program (79 Fed. Reg. 60809). The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed this notice and offers the following comments and recommendations.

BACKGROUND

NMFS is responsible for the conservation and management of all U.S. pinnipeds except walrus. Some Alaska pinniped species have populations listed under the Endangered Species Act (ESA) – the western Distinct Population Segment (DPS) of the Steller sea lion, southern DPS of the spotted seal, and the Arctic subspecies of the ringed seal. In addition, the Pribilof Island/Eastern Pacific stock of the northern fur seal is designated as depleted under the Marine Mammal Protection Act (MMPA) because the population on the Pribilofs has declined by more than 50 percent in the last six decades and is below its optimum sustainable population level. Population trends for most stocks of harbor seals in Alaska are unknown; some are stable or increasing, but stocks in the Aleutians and Glacier Bay are declining.

As with many marine mammal stocks, the lack of critical biological and ecological information is hampering stock assessments and the effective management of these pinnipeds. The stated goals of the proposed Alaska Pinniped Research Program include: 1) supporting effective conservation and management of seals, Steller sea lions and northern fur seals; and 2) implementing high-priority research objectives or recovery-plan conservation priorities.

RECOMMENDATIONS AND RATIONALE

Prioritization Process

NMFS has requested ideas regarding priority research topics that could be funded by the proposed Alaska Pinniped Research Program. The Commission does not believe that such priorities can be developed in isolation of the research directed at pinnipeds by NMFS itself and other research organizations. Identifying research priorities for the Alaska pinniped research community across all species, populations, and stocks is a formidable, but achievable task. With the overall priorities in hand, knowledge of the capacity, resources, and plans of the different research organizations could be used to identify which of the priorities that would best be addressed by the proposed research fund.

The proposed research program will be most effective in informing management and conservation if the priorities are acceptable to and agreed upon by the public (i.e., researchers, conservation groups, Alaska Native co-management organizations, and commercial interests). There are several strategies for setting priorities that would improve the chances of getting 'buy-in' from those stakeholders and lead to the program's success. The Commission believes that the process should be transparent, inclusive, based on objective criteria, and conducted by experts using data-driven and/or delphi methods, depending on the types and quality of data available. The Commission's recent Priorities Report for NMFS addresses a portion of this task by providing criteria that NMFS could use in setting its research priorities for marine mammals (Marine Mammal Commission 2014a).

In this case, the Marine Mammal Commission recommends that NMFS develop a process that would accomplish the following objectives:

1) Establish its goals for Alaska pinniped research using guidance in the ESA and MMPA, as well as input from the Commission;
2) Form a panel of pinniped experts (researchers, resource managers, Alaska Native co-managers, marine mammal commissions, conservationists, industry representatives) to recommend criteria and a process for prioritization that will be objective, transparent, and data/expert driven;
3) Use the recommended criteria and process from objective 2 to identify and prioritize Alaska pinniped research needs;
4) Assess the capacity, resources and plans of Alaska pinniped research organizations (including NMFS);
5) From the full set of research priorities (objective 3), identify those that would be best addressed by the proposed Alaska Pinniped Research Program; and
6) Solicit and incorporate comments and recommendations from the Commission, the independent panel, and other stakeholders on the full set of priorities (objective 3) and those linked to the proposed program (objective 5).

Research Priorities

The Federal Register Notice indicates that the program will focus on conservation and recovery priorities. Although NMFS does not identify the funding level of the program, it will certainly be insufficient to meet all previously identified priority research needs. This shortfall was made clear by the Alaska Region and Fisheries Science Center in a presentation to the Commission in 2012 (NMFS 2012), which showed that the majority of pinniped research and conservation objectives identified by NMFS were unfunded. Because the cause or causes of observed downward trends of some Steller sea lion, northern fur seal and harbor seal populations and stocks have not been conclusively identified, there is a pressing need for additional research. However, decades of research and at a cost of millions of dollars have not yet produced the scientific understanding and management actions necessary to reverse those trends. The Arctic ice-seal species (bearded, spotted, ringed, and ribbon) are now facing extensive environmental changes that are forecast to intensify in the future. Expanded research is critical to assessing and hopefully mitigating the impacts of climate change on these species.

The Commission has made numerous recommendations pertaining to research priorities for Alaska pinnipeds, but typically these have stemmed from consideration of the issues facing a single species, population, or stock. At a broader scale, the Commission's Strategic Plan identifies maintaining Arctic marine mammals as functioning elements of their ecosystems as its first strategic objective and calls for increased research efforts (MMC 2014b). Notwithstanding these recommendations and the prioritization process recommended herein, the Commission recommends that NMFS give careful consideration to the following needs: 1) research directed at conserving species, populations, or stocks that are listed as endangered or threatened (especially those most at risk of extinction or extirpation in the near future); 2) those that are declining and/or depleted; 3) those known or projected to be severely impacted by human activities, such as fishing or climate change; and 4) those for which there are concerns regarding sustainable subsistence harvests and/or human health. The Commission recommends once these needs are identified that NMFS consider giving the highest priorities to research approaches that 1) address the underlying causes of species, populations or stocks experiencing persistent declines or lack of recovery; 2) offer the prospect of not perpetuating previous, less than fully successful approaches; 3) rigorously monitor population trends; 4) investigate the impacts of climate change on Arctic pinnipeds; and 5) adequately monitor bycatch in commercial fisheries and subsistence harvest levels and health issues in Alaska Native communities. While advancing scientific understanding is important NMFS should focus on that research that has the best chance of leading to solutions to the most urgent and persistent conservation problems experienced by Alaska pinnipeds. Finally, because of ecological connections, NMFS should pursue coordination and collaboration with the Department of Interior and other organizations conducting research on walrus and polar bears.

Program Scope

Finally, in this request for comments, NMFS points to the conservation concerns regarding several pinniped populations and stocks in Alaska. The Commission agrees that more research is needed on these pinnipeds, but notes that there are other marine mammals under NMFS's jurisdiction (i.e., cetaceans) with similar or even more pressing research needs. Most notable are the endangered North Pacific right whale and Cook Inlet beluga whale. Most endangered is the eastern population of North Pacific right whales which occupies feeding grounds during the summer and fall in the southeast Bering Sea and northern Gulf of Alaska, and numbers roughly just 30 individuals (Wade et al. 2011). Population size estimates for the western population of North Pacific right whale are highly uncertain. IUCN Red List reviewers estimated this population to be approximately 400 whales (Reilly et al. 2008), and NMFS researchers have recently concluded that the size is likely "in the low 100s" (Ivashchenko et al. 2013). Low genetic diversity and a highly skewed sex ratio put the eastern population at extreme risk of extirpation (Leduc et al. 2012). Despite an urgent need for more research on the distribution, movements, demographics, and human threats to North Pacific right whales, NMFS has, for several years, decided not to allocate research funds for this species. The Cook Inlet beluga whale population is small and has been experiencing an ongoing decline for more than a decade from undetermined, but likely multiple, causes. Research is needed to identify the causes for the decline and to identify effective recovery actions. However, the research budget for this population has declined in recent years and the recovery plan has been delayed for years.

Given these important conservation concerns and the underlying need for additional research to address them, the Marine Mammal Commission recommends that NMFS identify a funding mechanism that will allow the expansion of the scope of the proposed research program to include Alaska cetaceans.

Thank you for the opportunity to comment on the proposed research program. Please contact me if you have any questions about our recommendations and rationale.

Sincerely,

Rebecca J. Lent, Ph.D.
Executive Director

References

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