



# MARINE MAMMAL COMMISSION

19 June 2017

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

Dear Mr. Kurland:

The Marine Mammal Commission (the Commission), in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the National Marine Fisheries Service's (NMFS) *Federal Register* notice concerning proposed annual subsistence harvest needs for fur seals on the Pribilof Islands for 2017-2019 (82 Fed. Reg. 22797). NMFS proposes to retain the existing annual harvest levels of between 1,645 and 2,000 seals for St. Paul Island and between 300 and 500 seals for St. George Island. This range of the projected subsistence needs for St. Paul was first adopted in 1992 and has remained unchanged since then. The projected harvest level for St. George remains unchanged since it was first adopted in 1997.

The *Federal Register* notice explains that NMFS is in the process of considering changes to the regulations governing the subsistence harvest on St. Paul Island, but that NMFS is not seeking comment on those potential proposals now. While the Commission appreciates that these processes should be considered separately, two of the comments submitted by the Commission on the possible regulatory changes are relevant here as well.

NMFS continues to rely on the potential biological removal level (PBR) calculated for northern fur seals as evidence that the anticipated harvest levels will not be detrimental to the recovery of the population. As noted on page three of the Commission's [27 February 2017 letter](#) to Mr. Balsiger, PBR is not an appropriate metric in this case because the population has been declining for over two decades despite estimated human-caused removals being substantially below the population's PBR level. Thus, the basic premise underlying the PBR concept, that the population will increase to or be maintained at its optimum sustainable population level if removals are kept below PBR, does not seem to be true in this instance. The Commission therefore recommends that NMFS refrain from relying on PBR as the basis for its conclusion that the proposed harvest levels will not have adverse effects on the Eastern North Pacific stock of fur seals. Instead, given the status and trend of the population, NMFS should be using an approach that assesses the impact of losses to the population from subsistence harvests in addition to the population decline that already is occurring and that may continue to occur.

In its 27 February 2017 letter, the Commission also noted the discrepancy between the projected subsistence need and recent harvest patterns on St. Paul Island. The Commission recommended that NMFS provide a more rigorous analysis of subsistence needs, including a discussion of (1) why NMFS believes that those needs are more than five times higher than the average number of seals harvested per year on St. Paul over the past 15 years, (2) whether St. Paul

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residents have been foregoing the opportunity to stockpile meat during the harvest season for use later in the year and, if so, why this might be the case, and (3) how any shortfalls in the availability of seal meat may have been offset by greater reliance on other subsistence species (i.e., are data available that show corresponding trends in these other harvests?). Although these recommendations were made in the context of a supplemental environmental impact statement, they are relevant in setting proposed annual subsistence harvest levels as well. The Commission therefore recommends that these issues be addressed before final harvest levels are adopted.

A similar situation and similar questions exist with harvest levels on St. George Island. Reported harvest levels generally are far less than the projected subsistence needs. Although the proposed harvest range remains at between 300 and 500 seals per year, the harvest has averaged just over 100 seals per year for the past 10 years. Although it would be useful for NMFS to provide analyses for the St. George Island harvest similar to those the Commission has recommended for St. Paul, the recent switch to a harvest of both sub-adult males and pups on St. George may have changed harvest patterns and the yield of meat per seal. This being the case, additional data are probably needed before such questions can be answered.

The Commission appreciates the opportunity to comment on the establishment of fur seal harvest levels for the Pribilof Islands. Please contact me if you have any questions concerning the points raised in this letter.

Sincerely,

A handwritten signature in blue ink that reads "Rebecca J. Lent". The signature is fluid and cursive, with the first name being the most prominent.

Rebecca J. Lent, Ph.D.,  
Executive Director