17 December 2021

Mr. Paul E. Michel, Regional Policy Coordinator
NOAA Sanctuaries – West Coast Region
99 Pacific Street
Monterey, California 93940

Dear Mr. Michel:

On 17 November 2021, the National Oceanic and Atmospheric Administration's (NOAA) Office of National Marine Sanctuaries (ONMS) published a *Federal Register* notice (86 Fed. Reg. 64190) seeking comment "to facilitate ONMS' review of the nomination for [the] St. George Unangan Heritage National Marine Sanctuary at the five-year Interval." Re-established in 2014 (79 Fed. Reg. 33851), NMFS' sanctuary nomination process allows for communities and coalitions of interested parties to nominate areas as potential National Marine Sanctuaries. NOAA evaluates nominations for sufficiency of information, and against national significance and management criteria. In January 2017, NOAA accepted the St. George Unangan Heritage National Marine Sanctuary (NMS) nomination as meeting the specified selection criteria and added the nomination to its standing inventory of areas it could consider for NMS designation as a National Marine Sanctuary. The preamble to the 2014 rule specified that nominations in the inventory would expire after five years, but through subsequent guidance issued in 2019 (84 Fed. Reg. 61546) NOAA established a process for extending the viability of nominations that continue to meet the selection criteria. With the five-year horizon on the original acceptance of the St. George Unangan Heritage NMS nomination approaching, NOAA has until January 2022 to conduct a review to determine if the nomination should remain active in the inventory. NOAA is seeking updated information about the area's natural and cultural resources and changes to threats to those resources, as it pertains to NOAA's 11 criteria[1] for inclusion of a nomination in the inventory. The Marine Mammal Commission staff has reviewed relevant documents, and concluded that the nomination clearly continues to meet the 11 inclusion criteria. As such, we support NOAA maintaining the St. George Unangan Heritage NMS nomination in the inventory.

The Pribilof Islands (St. George and St. Paul) and surrounding waters along the Bering Sea shelf break are unique, highly productive, and critically important to a wide variety of marine wildlife, including several million breeding seabirds, northern fur seals, harbor seals, Alaska pollock, and numerous other commercially important fish species (Springer et al. 1996). From the discovery of the Pribilofs by the Russians in 1786 to their purchase by the United States in 1867, roughly 6.4 million fur seals were harvested (NMFS 1993). The United States continued to harvest fur seals over the next century at substantial rates in the early years. In 1984, when the commercial harvest ended,

[1] The 11 criteria, which were established in 2014 (79 Fed. Reg. 33851), are based on the NMS designation standards in the National Marine Sanctuary Act (NMSA; Sec. 303(b)).

the fur seal species' population size was estimated to be 1.8 million, of which 80 percent of the population, or an estimated 1.44 million fur seals, bred on the Pribilofs (Roppel 1984). This represented a substantial decline from previous abundance estimates and, in 1988, NMFS designated the Pribilof Island fur seal stock as depleted under the Marine Mammal Protection Act (MMPA). The first stock assessment conducted by NMFS under section 117 of the MMPA, in 1998, estimated that approximately 980 thousand fur seals inhabited the islands in the early to mid-1990s (Scott and DeMaster 1998). From the mid-1970s, pup production, from which population-size estimates are derived, decreased rapidly at 6.5-7.8 percent per year until the early 1980s on St. Paul and the late 1980s on St. George, after which pup production stabilized. However, pup production began to decline again in the mid-1990s and has continued to decline on St. Paul at least through 2017; pup production on St. George has changed little since the mid-2000s (Towell et al. 2006, Muto et al. 2021). The most recent population estimate for the Pribilofs, based on pup counts on St. Paul and St. George in 2012, was roughly 518 thousand, or only 36 percent of what it had been just 28 years earlier in 1984 (Muto et al. 2021).

It is not clear what has caused this substantial decline in the fur seal population. There are a number of anthropogenic threats to northern fur seals, including bycatch in fisheries, entanglement in derelict fishing gear and other marine debris, and shipping, but assessments of these threats do not suggest that they are of sufficient magnitude to have caused the observed decline. Northern fur seals prey on a variety of fish species, including pollock (roughly 50-75 percent of their diet; Muto et al. 2021), which is an important commercial species with a very large fishery in the Bering Sea. It has been hypothesized that the substantial exploitation rates by commercial fisheries have altered the spatial and temporal distribution of pollock and reduced the availability of this preferred prey to fur seals, thus causing or significantly contributing to the decline (Trites 1992, Short et al. 2021). It is also possible that large-scale ecosystem changes in the Bering Sea, perhaps associated with changes in temperature regimes or ocean warming or predation, may have contributed to the decline (York 1995, Springer et al. 2003, Muto et al. 2021). Although research has not yet identified the primary cause or causes of the decline, the decline itself is well documented.

The nomination of the St. George Unangan Heritage NMS initially was proposed to protect an area around St. George Island out to 30 nm from the island. Protecting this area is likely to benefit the millions of seabirds that nest on St. George and a wide range of other marine resources. It will also help contribute to the availability of adequate and sustainable subsistence harvests of marine resources on which Pribilof Island residents and others depend and preserve native heritage values. However, given the troubling decline over the past several decades in the population of northern fur seals breeding on the Pribilofs and the possibility that fishing impacts on important prey species could be contributing to that decline, designation of a National Marine Sanctuary around St. George Island alone likely will provide scant benefit to recovery of northern fur seals.

We agreed with ONMS' assessment nearly five years ago that the proposed St. George Unangan Heritage NMS met the criteria for placement on the inventory of potential National Marine Sanctuaries and continue to believe that it meets those criteria. As such, it should remain on the inventory beyond the initial five-year period. In fact, we believe that ONMS should do more than retain the proposal on the list for possible future designation; it should initiate the process under 15 C.F.R. § 922.11 to select this nominated area for formal designation. We also are aware of an optional proposal to include St. Paul in the proposed NMS designation, and to extend the boundaries out to 100 nm around both islands (pers. comm., Aleut Community of St. Paul Island).

In one study, the maximum, straight-line distance traveled by foraging fur seals from their rookeries on the Pribilofs ranged from 100-143 nm (mean = 116 nm)(Call et al. 2008). Thus, protecting marine waters out to 100 nm around the Pribilof Islands, coupled with strong regulation of commercial fishing to protect the prey species that furs seals rely on, would create a more effective and inclusive National Marine Sanctuary. Therefore, we encourage NOAA not only to retain the St. George Unangan Heritage NMS nomination in its inventory, but also to consider altering the nomination to include waters around both St. George and St. Paul that encompass most of the critical fur seal foraging habitat in order to provide maximum protection and benefit to depleted northern fur seals and other at-risk marine species.

As ONMS considers whether to retain and, we hope, act on the nomination to create a National Marine Sanctuary around St. George Island, it would be fitting for the agency to think of ways that it could honor Patrick Pletnikoff, the late mayor of St. George, who was instrumental in developing and advocating for the sanctuary nomination. Although it would be a break from past practice to name a sanctuary to honor a particular individual, we think that it would be appropriate for ONMS to recognize his central role in this effort in some other, yet meaningful way.

We hope these comments are helpful. Please contact me if you have questions.

Sincerely,

Peter O. Thomas, Ph.D.,
Executive Director

References

Call, K.A., R.R. Ream, D. Johnson, J.T. Sterling, and R.G. Towell. 2008. "Foraging route tactics and site fidelity of adult female northern fur seal (*Callorhinus ursinus*) around the Pribilof Islands." Deep Sea Research Part II: Topical Studies in Oceanography 55(16-17):1883-1896.

Muto, M.M., V.T. Helker, B.J. Delean, N.C. Young, J.C. Freed, R.P. Angliss, N.A. Friday, P.L. Boveng, J.M. Breiwick, B.M. Brost, M.F. Cameron, P.J. Clapham, J.L. Crance, S.P. Dahle, M.E. Dahlheim, B.S. Fadely, M.C. Ferguson, L.W. Fritz, K.T. Goetz, R.C. Hobbs, Y.V. Ivashchenko, A.S. Kennedy, J.M. London, S.A. Mizroch, R.R. Ream, E.L. Richmond, K.E.W. Shelden, K.L. Sweeney, R.G. Towell, P.R. Wade, J.M. Waite, and A.N. Zerbini. 2021. Alaska Marine Mammal Stock Assessments, 2020. NOAA Technical Memorandum NMFS-AFSC-421, Seattle, Washington. 398 pp.

NMFS. 1993. Conservation Plan for the Northern Fur Seal *Callorhinus ursinus*. National Marine Mammal Laboratory, Alaska Fisheries Science Center, National Marine Fisheries Service, Seattle, Washington, and Office of Protected Resources, National Marine Fisheries Service, Silver Spring, Maryland. 89 pp.

Roppel, A.Y. 1984. Management of Northern Fur Seals on the Pribilof lslands, Alaska, 1786-1981. U.S. Department of Interior, NOAA Technical Report, NMFS-4. 26 pp.

Scott, H.P., and D.P. DeMaster. 1998. Alaska Marine Mammal Stock Assessments, 1998. NOAA Technical Memorandum NMFS-AFSC 97. 165 pp.

Short, J.W., H.J. Geiger, L.W. Fritz, and J.J. Warrenchuk. First-year survival of northern fur seals (*Callorhinus ursinus*) can be explained by pollock (*Gadus chalcogrammus*) catches in the Eastern Bering Sea. Journal of Marine Science and Engineering 2021(9):975.

Springer, A.M., C.P. McRoy, and M.V. Flint. 1996. The Bering Sea Green Belt: shelf-edge processes and ecosystem production. Fisheries Oceanography 5:205-223.

Springer, A.M., J.A. Estes, G.B. van Vliet, T.M. Williams, D.F. Doak, E.M. Danner, K.A. Forney, and B. Pfister. 2003. Sequential megafaunal collapse in the North Pacific Ocean: an ongoing legacy of industrial whaling? Proceedings of the National Academy of Sciences 100:12223–12228.

Towell, R.G., R.R. Ream, and A.E. York. 2006. Decline in northern fur seal (*Callorhinus ursinus*) pup production on the Pribilof Islands. Marine Mammal Science 22(2): 486-491.

Trites, A.W. 1992. Northern fur seals: why have they declined? Aquatic Mammals 18(1):3–18.

York, A.E. 1995. The relationship of several environmental indices to the survival of juvenile male northern fur seals (*Callorhinus ursinus*) from the Pribilof Islands. Pages 317–327 *in* R.J. Beamish, ed. Climate Change and Northern Fish Populations. Canadian Special Publication of Fisheries and Aquatic Sciences 121.