MARINE MAMMAL COMMISSION

18 September 2026

Mr. Eugenio Piñeiro Soler
Assistant Administrator for NOAA Fisheries
National Marine Fisheries Service
1315 East-West Hwy, Room 14636
Silver Spring, Maryland 20910-3225

Dear Assistant Administrator Piñeiro Soler:

The question of how to reduce pinniped predation on endangered salmon stocks in the Pacific Northwest is front and center in the national discourse, as evidenced by recent House hearings and introduction of legislation, and reflected in your September 2, 2026 letter on Advancing Agency-Level Reforms to Restore American Seafood Competitiveness. As a partner to agencies in the implementation of the Marine Mammal Protection Act (MMPA), the Marine Mammal Commission (the Commission) has worked alongside the National Marine Fisheries Service (NMFS) to evaluate and address this issue for many years. Given recent changes in NMFS's science staffing and priorities, and specifically with regard to pinniped research and management on the West Coast, we are writing to ask about your agency's plans to support the research required for an effective, science-based approach to the pinniped predation issue.

Measures to address such an important management issue should be based on current relevant information, including up-to-date assessments of the pinniped and salmon populations concerned (both range-wide and within focal salmon migratory corridors). Optimum Sustainable Population (OSP), Potential Biological Removal (PBR) calculations, and other management metrics under the MMPA rely on information in Stock Assessment Reports (SARs) but some of the required basic research is out of date. The currently available SARs for these pinniped populations were generated 8-13 years ago, and are based on much older survey efforts. We understand, however, that draft SARs have been prepared for several harbor seal stocks and will be out for public comment soon.

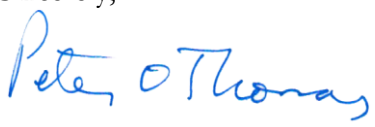
In addition to pinniped population data, updated information on the contributions of different prey species to the diets of sea lions and harbor seals in relevant salmon habitats could help inform assessments of pinniped impacts and potential management measures. Pinniped predation can impact endangered salmon stocks, but much more research is needed to better understand the scale of these impacts relative to other factors, to determine which salmon life-stages are significantly affected by pinniped predation, and where such effects occur. Updated models are needed to assess the impacts of pinniped predation on salmon recovery and the effectiveness of proposed (or implemented) measures at different scales, times, and locations. Research on other threats to salmon population recovery is needed, including how habitat degradation, at-sea fishing removals, and other factors reduce salmon stock abundance.

The Commission's specific questions are:

- What is your agency's assessment of the need for additional research staffing and funding in order to inform management of pinniped predation?
- What staffing, survey, and other research investments does NOAA need to ensure that relevant SARs are up to date to support management decisions based on best available science?
- How are the research responsibilities for investigation of the fisheries and marine mammal aspects of the pinniped predation issue apportioned among the NMFS Science Centers, and are current funding and staffing resources adequate to ensure success?

The Commission looks forward to learning more about NMFS's approach to the science needed on the issue of pinniped predation on salmon stocks. Our shared goal should be to identify and implement the most effective measures to reduce the impacts on salmon population recovery while at the same time ensuring the long-term conservation of pinniped populations. We stand ready to assist you and your staff in defining research questions and identifying needs for further support.

Sincerely,



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

cc: Evan Howell, Deputy Assistant Administrator for Scientific Programs, NOAA Fisheries
Kim Damon-Randall, Director, Office of Protected Resources, NOAA Fisheries