



MARINE MAMMAL COMMISSION

18 September 2009

Mr. Sam D. Hamilton, Director
U.S. Fish and Wildlife Service
1849 C Street, NW
Washington, D.C. 20240

Dear Mr. Hamilton:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the Fish and Wildlife Service's draft 2009 stock assessment report for the Pacific walrus (*Odobenus rosmarus divergens*) (74 Fed. Reg. 28946). As you know, the Commission usually writes a letter detailing specific recommendations and comments to help the Service improve these assessments.

However, the draft report for the Pacific walrus raises some especially difficult issues. No one familiar with the walrus would argue that it is an easy species to study. Walruses live in a highly dynamic ecosystem in a remote region of the world and exhibit haul-out patterns, and clumping behavior when hauled out, that are not well understood. Consequently, any kinds of surveys to assess distribution and estimate population size pose great challenges. The most recent abundance estimate is almost two decades old, and the Service's most recent stock assessment report is seven years old—both of which fall well short of the standards required by the Marine Mammal Protection Act and the guidelines developed for implementation of the Act. Furthermore, three years after the collection of assessment data in 2006, the analysis of those data is still not complete. Thus, the draft report contains an estimate of minimum abundance that is based on insufficient analysis of the available information, is almost certainly negatively and substantially biased, and is consequently quite inadequate as a basis for informed management. The resulting lack of information is a very serious issue, as thousands of walruses are still being harvested each year, apparently without a basis for determining whether the harvest level is sustainable.

However, as you know, the actual situation is even worse. Although scientists know more about the walrus than about some of the other Arctic marine mammals, our knowledge of several matters critical to walrus conservation is still inadequate. Walruses are shifting their distribution trying to compensate for receding ice and declining access to foraging areas; large numbers have been reported in poor condition or dead on U.S. and Russian shores; and shore-based observations in Alaska indicate that recent cohorts are suffering elevated mortality rates. Thus, the species' natural history and a growing body of anecdotal information all indicate that the walrus is being affected seriously by climate change, and the outlook for the future appears far worse. Furthermore, oil and gas exploration has dramatically increased in the last three years in the Chukchi Sea, a prime summering area for walruses, with potential for further development in coming years. Commercial shipping also is expected to increase in the Arctic. Thus, industrial activities may soon contribute to the stresses that walruses are already experiencing.

Despite the serious threats to the walrus, neither scientific nor management efforts are meeting expectations. Although the Commission has specific questions it would like to discuss with you (e.g., the continuing lack of reliable information on abundance), the broader question is how the

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Service plans to move forward on all fronts to conserve the Pacific walrus, which is faced with a rapid decline in its prime habitat.

The Commission would like to help you tackle this challenge if you can advise us on the most useful ways that we might support you. Some examples might include helping to find additional resources, making a stronger case to the Administration or the public that you need additional support, or possibly helping enlist additional scientific expertise. Continuing on the present course seems unthinkable in the face of the enormous challenges posed by climate change.

For all these reasons, the Commission would welcome an opportunity to meet with you to discuss the future of the walrus, your research and management needs, and the best possible strategy for conserving this species. Please contact us when you are able to meet and discuss these matters.

Sincerely,



Timothy J. Ragen, Ph.D.
Executive Director

Cc: Rosa Meehan, Ph.D.