



# MARINE MAMMAL COMMISSION

17 June 2010

Jane Lubchenco, Ph.D.  
Under Secretary for Oceans and Atmosphere  
Department of Commerce  
14th and Constitution Avenue, NW, Room 5128  
Washington, D.C. 20230

Dear Dr. Lubchenco:

As leader of the National Oceanic and Atmospheric Administration, you must maintain a broad, high-level perspective to address the many threats to our oceans and prioritize your agency's conservation efforts. The nation's pending new ocean policy—to which you and NOAA have been leading contributors—provides a broad conceptual framework for managing those threats. The policy promises to renew our sense of purpose, improve our level of organization, and boost our morale.

The effectiveness of those policies, however, must be measured “in the field” where management and the natural world meet. This letter is about two issues where the connection between national aspirations and real-world implementation is tenuous and in need of your strong leadership to ensure that broad policy direction achieves its intended purpose. Those issues involve NOAA's management programs to (1) prevent the extinction of Hawaiian monk seals and (2) conserve cetacean stocks throughout the Pacific Islands Region.

## **The Hawaiian Monk Seal**

The Hawaiian monk seal numbers fewer than 1,200, about one-third of its abundance when the first counts were made in the 1950s. The population is declining at a rate of 4.5 percent annually and is expected to continue to decline for some time because of its distorted age structure and the lack of female recruitment to reproductive age. The primary problems in the Northwestern Hawaiian Islands (where 85 to 90 percent of the population occurs) are starvation of pups, shark predation, and entanglement in marine debris, all of which contribute to exceedingly poor juvenile survival. The primary problems in the main Hawaiian Islands (where numbers are low but growing) are interactions with humans (conflicts between seals and commercial, recreational, and artisanal fisheries; competing seal/human use of popular tourist beaches) and the antagonism of several sectors of society toward monk seal repopulation of the main Hawaiian Islands (a number of monk seals have been shot).

The National Marine Fisheries Service is responsible for recovering the Hawaiian monk seal, and it works with other agencies to accomplish critical recovery tasks. Over the years, the Service has developed a strong research program and, more recently, has begun the process of building an appropriate management program. The current management staff is doing outstanding work, but the demands far exceed the staff's current capacity simply because of its limited numbers.

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The Marine Mammal Commission's detailed recommendations for addressing these and other issues are spelled out in the enclosed letter to Eric Schwaab, your new Assistant Administrator for Fisheries.

On several occasions in the past 200 years, the Hawaiian monk seal has been extirpated throughout significant portions of its range. Each time it has shown remarkable resilience and recovered when given a chance. There is no reason to think that the species is less resilient now. What has changed most over the years is the suite of threats, all of which require strong management.

Building the needed management capacity requires a budget both large enough and consistent enough over time to create a focused, sustained response to the current suite of threats. The 2007 Revised Hawaiian Monk Seal Recovery Plan calls for an annual budget of \$7.2 million. In the Commission's view, that amount is appropriate. It is similar to or even less than amounts that have been allocated for recovery of other endangered marine mammal species and populations (e.g., North Atlantic right whales, Florida manatees, Steller sea lions), some of which are arguably less critically endangered than the Hawaiian monk seal and none of which involves the fate of an entire genus of marine mammals. The combined management and research budgets for the monk seal for fiscal years 2009 and 2010 were \$5.7 million and \$5.6 million, respectively. These amounts will not be enough to accomplish the necessary tasks currently under development and discussion. The Marine Mammal Commission recommends, and indeed urges, that you commit NOAA and the National Marine Fisheries Service to supporting this program at the necessary levels identified in the revised monk seal recovery plan for the foreseeable future. Like so many other crises, the costs of recovery will only increase if the situation is allowed to deteriorate from lack of funding. The Marine Mammal Commission would welcome a chance to meet with you or help in any way it can to secure the funding needed to carry out this vital recovery program.

### **Cetaceans in the North Pacific Ocean**

The second issue pertains to cetaceans in the U.S. waters of the central and western Pacific Ocean. Again, the National Marine Fisheries Service is responsible for research and management related to these cetacean species but, 16 years after the Marine Mammal Protection Act was amended to require annual stock assessment reports, the Service has adequate assessments for only three of the dozens of stocks in this region. Undoubtedly, this reflects the daunting challenge of working in this vast region and the lack of suitable infrastructure to support research and management. Nonetheless, many cetacean stocks in this region appear to be smaller and more isolated than previously recognized, and they are likely subject to significant risks from longline and other types of fisheries. The Commission describes its concerns with regard to Pacific cetaceans in a second enclosed letter to Mr. Schwaab. To address those concerns, the Marine Mammal Commission recommended that the National Marine Fisheries Service (1) review its responsibilities for cetacean research and management in the Pacific Islands region, (2) develop a plan and budget adequate to fulfill those responsibilities, (3) identify strategies to strengthen cooperative partnerships with other agencies and groups that work in the Pacific region and that can complement and facilitate the Service's cetacean research and management objectives; and (4) initiate or expand

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international partnerships to coordinate research and management efforts with those of other countries with jurisdiction over waters in the central and western Pacific Ocean. Here, too, the Commission would be pleased to meet with you and Mr. Schwaab to discuss strategies for building the Service's capacity to accomplish its objectives.

Please let us know how we can support your efforts to recover the Hawaiian monk seal and protect Pacific cetaceans.

Sincerely,

A handwritten signature in blue ink that reads "Timothy J. Ragen". The signature is written in a cursive style with a large, sweeping "T" and "R".

Timothy J. Ragen, Ph.D.  
Executive Director

Enclosures

Cc: Sam Pooley, Ph.D.  
Mr. Bill Robinson  
Mr. Eric Schwaab