

January 1, 2018

Petersburg Borough Assembly  
PO Box 329  
Petersburg, AK 99833

Dear Mayor Jensen and Borough Assembly Members,

Thank you for your December 19<sup>th</sup> letter regarding sea otters and upcoming Marine Mammal Protection Act legislation. We have several ideas to make the utilization of sea otters more economical.

First and foremost, we encourage the Assembly to consider asking the management of the northern sea otters stocks in Alaska be moved from the jurisdiction of the U.S. Fish and Wildlife Service (USFWS) to the Alaska Department of Fish and Game. These mammals live in state waters and would be better managed by the State of Alaska where the game and fish divisions could work together to manage populations with ecosystem-based considerations.

The USFWS has not surveyed the Northern Gulf area of the Southeast Alaska sea otter population since 2000. And Yakutat Bay has not been evaluated since 2005. The last population estimates for Northern Southeast and Southern Southeast areas occurred in 2010 and 2011 respectively.

We assume ADF&G would have better access to evaluate biomass and carrying capacity more frequently. Thereby allowing them to better manage the population for an ecological balance between sea otters, shellfish species, and humans. USFWS estimates the Southeast Alaska sea otter population increases by 12-14% per year and has done nothing to manage the growth. They further determined the potential biological removals in Southeast are 2,179 sea otters per year, while human removals are only 447<sup>1</sup>. These estimates are based off the previously mentioned out-dated surveys.

The Southcentral and Southeast Alaska stocks are neither listed as "depleted" under the MMPA or listed as "threatened" or "endangered" under the Endangered Species Act, nor are they likely to be listed as such in the foreseeable future according to USFWS.

However, the Southwest stock is listed as "threatened" under the ESA and it is classified as a strategic stock under the MMPA. An alternative approach could be to ask that only the stocks not listed under the ESA be moved to the jurisdiction of ADF&G.

Second, we would recommend legalizing the sale of pelts. Currently, only pelts made into traditional art or clothing can be sold requiring expensive sewing machines and excessive time to create a product from each sea otter harvested. Reducing the labor and equipment costs would make the harvest and sale of sea

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<sup>1</sup> U.S. Fish and Wildlife Service (Rep.). (2014, April). Retrieved December 28, 2017, from Stock Assessment Report: Sea Otter, Southeast Alaska Stock website:  
[https://www.fws.gov/alaska/fisheries/mmm/stock/Revised\\_April\\_2014\\_Southeast\\_Alaska\\_Sea\\_Otter\\_SAR.pdf](https://www.fws.gov/alaska/fisheries/mmm/stock/Revised_April_2014_Southeast_Alaska_Sea_Otter_SAR.pdf)

PVOA's mission statement is to:

"Promote the economic viability of the commercial fishing fleet in Petersburg, promote the conservation and rational management of North Pacific resources, and advocate the need for protection of fisheries habitat."

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otters more profitable for Coastal Alaska Natives. Hopefully this would also increase the annual human harvest to a level closer to the potential biological removals. However, skinning, fleshing, and tanning a pelt is still a laborious process. Lowering the blood quantum for Coastal Alaska Natives from 1/8 to 1/16 may be another method to increase access for harvest.

Thank you again for the outreach on this matter. Please let us know how we can help with this or other fisheries related issues in the future.

Respectfully,



Megan O'Neil  
Executive Director

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