



September 26, 2017

**Via email: [npfmc.comments@noaa.gov](mailto:npfmc.comments@noaa.gov)**

Mr. David Witherell  
Executive Director  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska 99501-2252

**Re: Oct 2, 2017 Meeting of the North Pacific Fishery Management Council  
B7 – Rep 17-034 - Northern Fur Seal Synthesis**

Dear Mr. Witherell:

Please accept the attached comment of the Tanadgusix Corporation, the Alaska Native Village Corporation for St. Paul Island, in the record for the above referenced meeting, related to Agenda Item B7, presenting Rep. 17-034, Northern Fur Seal Synthesis.

Thank you for your consideration.

Sincerely,

A handwritten signature in blue ink that reads 'Ron Philemonoff'.

Ron G. Philemonoff, CEO  
The Tanadgusix Corporation

Attachment



### **TDX'S COMMENTS ON THE NORTHERN FUR SEAL DEPLETION**

Tanadgusix Corporation is the Alaska Native Village Corporation, ANC, for the Island of St Paul in the Pribilof Islands. We are not only a recognized Tribal Organization, we are also one of the directly-related private parties referred to in the Fur Seal Conservation plan that has a direct bearing and relationship with the survival of the Northern Fur Seals. Our People, the Aleut People of the Aleutians and Pribilof Islands, have lived in harmony for 10,000 years in the Bering Sea and Pacific Ocean side by side with the Northern Fur Seals. We in the Pribilofs are the people for the Northern Fur Seals. What happens to the Fur Seal directly impacts who and what we are. The survival of the Fur Seal is our Survival.

We are greatly disturbed by the 50-year decline of the Fur Seal population, and more so greatly disturbed by the inaction of the Federal Government and conflicts of the NPFMC on this great disaster. We have known and seen the declines happening, but yet we turn a blind eye to the facts, and say more research is needed before we can believe the facts. The Pup counts / production rates have been declining at an alarming rate of ~ 8% a year for the last 50 years since the 1960's. By 2016, the population of the Fur Seals had lost another 50% since just 1972. The population is now at or below the great near-extinction crash of 1903. Most believe the Northern Fur Seal population numbers are beyond the Endangered Species threshold number, particularly when one looks at the ever-decreasing pup counts alone.

The Northern Fur Seal stock is now estimated to be around 400,000 animals, another 50% decline compared to back when the Fur Seals were declared Depleted in 1988 (the herd had already declined to 50% of the levels recorded in the 1950's, which was estimated to be well over 2 million animals). Now, fast forward 30 years later, and we have continuous declines at even greater rates. We are seeing a 75% overall collapse of the Northern Fur Seals. With those kinds of staggering numbers, the fact is the Northern Fur Seal needs to be listed under the Endangered Species Act.

It's important that we study and list all possible causes and all possible ongoing impacts. However, after 30 years of briefly mentioning prey concerns, very little attention and verbiage in these reports is given to the feeding needs and the feeding habitat of the Northern Fur Seals. We now know that the feeding habits of the St. Paul seals have switched to mainly Walleye Pollock, now 93% of their prey. Furthermore, we now know their summer foraging areas are in the two major fisheries prosecuted areas, mainly the Zhemchug and Pribilof/ St. George Canyons.

The Fur Seals are not necessarily dying off in great numbers because of ocean debris, contamination, net entanglement, near shore fisheries, or because the Aleuts are eating them all. A bigger threat to their food stock/ prey may be the massive modern fishing efforts into the Fur Seals' key Feeding habitat areas, the Zhemchug and Pribilof / St. George Canyons.

What do we do to turn this disaster around for the Northern Fur Seal? We have the Conservation and Management plans for the Northern Fur Seal, from 1993 and 2007, that state the goal is to have the Northern Fur Seals recover to the Optimum Sustainable Population ("OSP") at 60% of their peak historical



estimated population. Many believe this level should equate to approximately a population of 1.2 to 1.8 million animals. This Conservation and Management plan called for the Federal Government, the Tribe, and international and private entities together to coordinate research, management, and recovery efforts. The Tribe was to be an equal to the Federal Government, and to have more meaningful involvement by and through a co-management agreement process. However, to date the Tribe continues to seek a true meaningful partnership with the Federal Government, through NMFS, to make joint decisions and plans affecting the management and research work that will lead to the ultimate recovery of the Northern Fur Seal population.

To date none of the 4 major objectives of the Conservation and Management plan has been carried out, or are even close to being accomplished in the last 25 years, maybe other than to micro manage the Aleut People in and around the Pribilof Islands.

One known, big variable human cause that may be directly impacting the Northern Fur Seals is the ongoing fishing efforts and take of the Fur Seals' prey in key summer feeding times and in key habitats. Unfortunately, the NPFMC and the fishing Industry have not recognized that this big variable could be contributing to the decline. They have jointly pushed back all reports and efforts to eliminate or even mitigate this potential negative impact for the last 30 years. We are now at the end of the net. There is no more fish for the seals, and therefore no other recourse but to call for the Northern Fur Seal to be declared an Endangered Species under the ESA. Once under the ESA as an Endangered Species, we can seek and get priority funding for more research, and get more management tools in place, such as time and space management plans, to ensure the fishing industry is not taking prey species out of the system/habitat when the female Fur Seals are feeding in these critical habitats.

Thank You,

*Ron Philemonoff, CEO*

**TDX CORPORATION**  
**TDX Holdings LLC**  
3601 C Street, Suite 1000  
Anchorage, Alaska 99503