

March 28, 2017

Dan Hull, Chairman  
Chris Oliver, Executive Director  
Steve MacLean, Protected Resources Coordinator  
North Pacific Fishery Management Council  
605 West 4<sup>th</sup> Avenue, Suite 306  
Anchorage, Alaska, 99501

**Re: Comments for North Pacific Fishery Management Council's Meeting  
Beginning April 3, 2017, Agenda Item: "B" Reports.**

Dear Chairman Hull,

The Pribilof Islands Aleut Community of St. Paul Island ("The Tribe"), and Tanadgusix Corporation ("TDX"), the Alaska Native Village Corporation for St. Paul Island, very much appreciate the interest of the North Pacific Fishery Management Council in addressing the decline of the Northern Fur Seal. As was noted to the Council most recently in a letter submitted during its last meeting,<sup>1</sup> the Northern Fur Seal has been extremely important to the history, culture and subsistence needs of the Aleut people who live on St. Paul Island for many years.

We understand that the National Marine Fisheries Service ("NMFS") will be presenting a report on the status, trends and plans for research and management of the fur seals in the Pribilof Islands as part of the "B" Reports. We look forward to reviewing the report, and hope that the Council will take whatever steps are necessary to further research on the causes of the decline. We are very concerned about the continued decline, and urge that this issue be prioritized in the AFSC research budget.

The Pribilof Island Collaborative funded by the World Wildlife Fund went through a process a decade and a half ago that brought in scientists, industry, and the Pribilof communities to look into, among other things, the reasons for fur seal declines. At the end of that extensive process, it was noted that better scientific data and more research was needed in order to guide management policies affecting fur seals. We can provide information about that process that could be useful moving forward.

As the SSC has noted, if the Council and NMFS are to manage fisheries holistically, using an ecosystem-based approach, developing scientific data is essential to making effective decisions.

We look forward to working with the Council and NMFS as plans develop. We understand Council Members and Staff have tentatively scheduled a trip to St. Paul for late June, 2017. That trip could be extremely valuable to gain first-hand knowledge about the fur seals and their critical importance to the community.


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<sup>1</sup> Letter of Ron Philemonoff, Chief Executive Officer, TDX Corporation, to Council Chairman Dan Hull, dated January 24, 2017.



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Ron Philemonoff, CEO  
Tanadgusix Corporation



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Amos T. Philemonoff, Sr.  
President, Aleut Community of St. Paul Island