

January 12, 2018

Board of Fish Members,

The following organizations and individuals request the Board of Fish take action on the ever expanding sea otter problem. We believe that a letter from the Board of Fish expressing concern about the lack of management of the sea otter population and it's impacts on the stocks that you are responsible for the management of to Secretary Zinke, Congressional Delegation and Governor Walker would be helpful especially in light of the information that the Marine Mammal Protection Act may have Senate hearings in 2018.

Points the Board may wish to make within a letter are as follows:

- The State of Alaska and the US Federal Government translocated sea otters into Southeast Alaska in 1965-1969 after the extinction of the species in the late 1800's. In that time a new ecosystem of healthy shellfish resources developed.
- These resources are important to both subsistence, personal use, sport and commercial fisheries of Southeast Alaska. The shellfish impacted is abalone, sea urchins, sea cucumbers, clams, geoducks, gum boots, crab (Dungeness, tanner, red king crab) and shrimp.
- These effects have been as impactful on users as many of the fishery disasters declared for salmon.
- The Alaska Department of Fish & Game (ADF&G) provided estimates of sea otter growth from 9,000 in 1994 to 25,000+ in 2013¹. ADF&G stated the annual rate of increase for the Southeast Alaska Sea otter stock ranged from 15.7% to 23.3%.²
- The uncontrolled growth of sea otters without any management or tools for management is causing a severe decline in important commercial and subsistence fisheries.
- The sea urchin fishery was the first commercially important fishery to be affected, with the closure of Sitka Sound because of severe declines. Several of the areas have been closed due to low abundance to try and protect the remaining spawning biomass. ADF&G has tried to determine if populations can recover from high levels of sea otter predations. An example is Tebenkof Bay, on the west side of Kuiu Island, which was closed to commercial fishing in 2004 because of the virtual elimination of sea cucumbers by sea otters. In 2011 the department conducted another survey in the area and found that no recovery of the sea cucumber populations had occurred and that sea otters were still abundant. Similar results were found in other areas and time. The sea otters are thought to be a main factor preventing abalone from recovering.²

¹RC 3 tab 8 Oral Report on Dive Fisheries in Southeast Alaska page 7

² Fishery Management Report No 17-59 2018 Report to the Board of Fisheries, Miscellaneous Shellfish Fisheries page 16 & 17

- Changes to the Marine Mammal Protection Act need to provide for the protections of threatened species, but not to the point that it causes a prey species to become threatened or endangered.
- A sea otter will eat approximately 13 pounds of food a day, so the math with a population of 25,000 sea otters x 13 pounds of food = 325,000 pounds x 365 days a year = 118,625,000 pounds of resource consumed in a year

We sincerely believe without help we are facing the possibility of threatened and endangered species occurring in Southeast Alaska due to the uncontrolled growth with no management plan or tools to control the sea otters. The below groups are willing to help with providing any additional information or help with the drafting of a letter.

Sincerely,

Kathy Hansen
Southeast Alaska Fishermen's Alliance

Phil Doherty
Southeast Alaska Regional Dive Fisheries Association

Mike Lockabey
Coalition of Wrangell Crab Fishermen

Megan O'Neil
Petersburg Vessel Owner's Association

John Moller
Shellfish Preservation Alliance