



THE STATE
of **ALASKA**
GOVERNOR BILL WALKER

RC 058
Department of Fish and Game

Alaska Board of Fisheries

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DRAFT March 9, 2018

Ryan Zinke, Secretary
Office of the Secretary
U.S. Department of Interior
1849 C Street NW
Washington DC 20240

Wilbur Ross, Secretary
Office of the Secretary
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Subject: Southeast Alaska Sea Otter Population Growth Impacts

Dear Secretaries Zinke and Ross:

The Alaska Board of Fisheries (Board) establishes regulations providing for conservation and utilization of Alaska's subsistence, sport, commercial, and personal use fisheries. The Board's process brings forth one of the highest levels of public input of any regulatory process in the nation. At the Board's recent thirteen-day Southeast Alaska Shellfish and Finfish regulatory meeting, Board members reviewed and deliberated on 155 public and agency proposals while receiving public comments and testimony from more than 200 Alaskans. During the meeting it was made clear through testimony from the Alaska Department of Fish and Game (ADF&G) and the public that sea otter repopulation efforts in Southeast Alaska through the Marine Mammal Protection Act (MMPA) have been extremely successful.

Enacted in 1972, the MMPA is critical US legislation designed to protect threatened marine mammal species, including sea otters in Southeast Alaska. Sea otter populations were decimated throughout our state by early Russian explorers seeking furs. Under the MMPA, Alaska sea otter reintroduction and recovery began in the 1960s and according to the most current published reports from the US Fish and Wildlife Service (USFWS) by 2013 the number of wild otters exceed 25,712. This level of recovery makes the sea otter a landmark success under the MMPA, but at the current USFWS estimated of annual growth rate of 12-14%, the population could reach unsustainable levels and will place significant additional pressure on the surrounding ecosystem.

The growing population of otters may continue to harm and ultimately eliminate some key fisheries that are important sources of food and livelihoods for coastal communities, subsistence harvesters, and commercial fishermen. To address this unique marine mammal recovery, the Board is in support of efforts by the US Departments of Commerce and Interior to review the MMPA with the intent to allow the affected communities to responsibly and sustainably manage the species and is encouraging Congress to undertake similar review.

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Asking the federal government to adjust the MMPA from a law that promotes species repopulation with no control, to one that manages successful repopulation at a sustainable level is not something the Board takes lightly. We recognize the importance of sea otters to our environment, ecosystem, and visitor industry, and place great value in maintaining a healthy sea otter population.

That said, the impacts of this successful reintroduction and continued population growth is profound. The estimated annual consumption of the current sea otter population is 195 million pounds of seafood, the primary take being shellfish. Based on the growth estimates through 2030, this number edges closer to half a billion pounds annually. Compared to the estimated 195 million pounds consumed by the sea otter population each year, Southeast Alaska's commercial fishermen targeting the same species harvest between 5-7 million pounds annually – approximately 3-4% of the shellfish consumed annually by sea otters.

Many areas carefully managed for long-term sustained fisheries are now gutted with no expectation of species recovery in the foreseeable future. At the Board's Southeast meeting, commercial fishing divers reported no remaining signs of prey species in areas where sea otters are abundant. As these commercial fisheries close, fishermen seek new areas including those near communities that are heavily used by local subsistence harvesters. These migrations create increased user conflict, often leading to additional closures for commercial harvesters. Loss of these fisheries will have a significant economic impact on many rural coastal communities; in 2016 alone, the value paid to commercial harvesters for key shellfish species was \$18.6 million spread across 447 permits.

The Board appreciates your consideration of its concerns on behalf of impacted Alaskans.

Regards,

John Jensen
Chairman, Alaska Board of Fisheries

cc: Honorable Senator Lisa Murkowski, U.S. Congress
Honorable Senator Dan Sullivan, U.S. Congress
Honorable Representative Don Young, US Congress
Honorable Governor Bill Walker, State of Alaska
Honorable Pete Kelly, Senate President, Alaska Legislature
Honorable Bryce Edgmon, House Speaker, Alaska Legislature