

**FISHERY MANAGEMENT PLAN or REGULATORY AMENDMENT PROPOSAL  
North Pacific Fishery Management Council – Steller Sea Lion Mitigation Committee**

**Name of Proposer: St. George Traditional Council**

**Date: August 18, 2006**

**Address: P.O. Box 940, St. George Island, Alaska 99591**

**Telephone: 907 859 2205**

**Fishery Management Plan:** Bering Sea/Aleutian Islands Groundfish Fishery Management Plan

**Brief Statement of Proposal:** The St. George Traditional Council requests that the North Pacific Fishery Management Council (NPFMC) review the current protection measures established for the Dalnoi Point Steller sea lion haulout, and based on the extensive use of this area, extend the current 0-3 nautical mile trawl closure to prohibit groundfish trawling within 0-20 nautical miles of this haulout.

**Objectives of Proposal:** In contrast to the majority of Steller sea lion (SSL) critical habitat (CH) designated under the Endangered Species Act, groundfish trawling is prohibited from only 0-3 nautical miles of the St. George Island SSL haulout at Dalnoi Point under the current protection measures. This is because the consistent, long-term usage of Dalnoi Point was not recognized when the National Marine Fisheries Service (NMFS) adopted the current protection measures in January 2003.<sup>1</sup> The St. George Traditional Council has since presented evidence to NMFS and the NPFMC that significant numbers of Steller sea lions use Dalnoi Point and other St. George Island haulouts, especially during winter and spring (Figure 1). These data establish that as the largest haulout area in the Pribilof Islands Archipelago, Dalnoi Point is regularly used by substantial numbers of sea lions and warrants a greater level of protection.

**Need and Justification for Council Action:** On March 30, 2005, the Traditional Council requested that the NPFMC review and reconsider the protection measures established for St. George Island haulouts. The Traditional Council first made this request to NMFS, which forwarded it to the NPFMC, on September 24, 2004. Through the Steller Sea Lion Mitigation Committee (SSLMC), the NPFMC is accepting proposals for purposes of recommending possible changes to existing protection measures and interacting with NMFS during the reinitiated Endangered Species Act (ESA) Section 7 Consultation. Therefore, action by the NPFMC is necessary and appropriate to address and resolve this issue.

**Foreseeable Impacts of Proposal:** The 2003 Supplement to the 2001 BiOp<sup>2</sup> documents that pollock catch in St. George Island CH (0-20 nm) increased nearly tenfold between 1999 and 2002, from 0.39% to 2.07% of the EBS pollock fishery total (Table III-9C, p. 107). Pollock catch in 2002 in the 0-10 nautical mile zone of St. George Island CH amounted to 0.2% of the EBS pollock total catch. NMFS summarized the existing protection measures by stating on page 56 of the 2001 BiOp Supplement that “[i]nside 10 nm conservation measures are very

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<sup>1</sup> 67 Fed. Reg. 56692, 56703 Sept. 4, 2002; 68 Fed. Reg. 204 Jan. 3, 2003

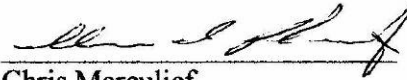
<sup>2</sup> NMFS. 2003. Supplement to the 2001 Endangered Species Act, Section 7 Consultation, Biological Opinion and Incidental Take Statement on the authorization of the Bering Sea/Aleutian Islands and Gulf of Alaska Groundfish Fishery Management Plan Amendments 61 and 70. NMFS Alaska Region, Protected Resources Division, Juneau, AK.

conservative except for catch off St. George Island.” Although a disproportionate level of fishing occurs in proximity to St. George Island, if current catch rates resemble those of 2002, only a relatively low level of fishing overall need be displaced in order to dramatically improve the protection of critical habitat in the Pribilof Islands and establish SSL protection measures comparable to those established for the rest of the Western Stock.

**Are there Alternative Solutions?** There are no alternatives to a 0-20 nm trawl prohibition that can offer the same level of protection for CH surrounding the Dalnoi Point haulout. In our previous request to the NPFMC on March 30, 2005, the Traditional Council requested a 0-10 nm trawl closure. However, in view of the continued decline in pup production observed at Walrus Island in 2005, additional protection measures are necessary to maintain the viability of the Pribilof Islands Steller sea lion population.

**Supporting Data & Other Information.** See attached.

**Signature:**

  
for Chris Mercurief  
President  
St. George Traditional Council

## Supporting Data & Other Information for the St. George Traditional Council Proposal

- Since 2002, significant numbers of SSL have been observed from December through April at three haulouts on St. George Island: Dalnoi Point (max. count 439 on 3/19/04; see also Figure 1), Murre Rock (max. count of 44 sea lions on 5/11/05), and Tolstoi Point (max. count of approximately 100-125 sea lions on 3/24/04). Sea lions have also been observed during both winter and summer at these and other sites including Kitasilax, East Reef, Northwest Rookery, South Rookery, Staraya Artil Rookery, Sea Lion rock and the St. George harbor. These results indicate that large numbers of sea lions utilize several St. George haulouts during winter and spring, and that year around there are sea lions hauled out on the Island. The average maximum count of sea lions at the Dalnoi Point haulout during March of 2004-06 (mean number = 376.7) exceeds by nearly four-fold the Alaska-wide average for March haulout counts recorded in 1993 and 1999.<sup>3</sup>
- The widespread use of St. George Island haulouts during winter is significant in several regards. Steller sea lions typically nurse their pups throughout the winter, moving their pups to winter haulouts following the summer breeding season.<sup>4,5</sup> Figure 2 shows zoomed in views of Dalnoi Point haulout on January 18, 2005 with juvenile sea lions clearly visible in the photo and several possible mother-pup pairs. However, the post-molt status of the sea lions at this time of year makes this difficult to determine without documenting nursing events. It is reasonable to assume however, based on other studies of Steller sea lions,<sup>4,5</sup> that mother-pup pairs from Walrus Island move to other Pribilof haulouts such as Dalnoi Point during the winter, especially when Walrus Island offers little protection from winter storms. Figure 3 presents further evidence in this regard showing a pre-molt Steller sea lion pup, likely with its mother, photographed at Tolstoi Point on September 4, 2004.
- The importance of the Dalnoi Point haulout is underscored by the results of the 2005 pup counts at Walrus Island rookery. The Draft Steller Sea Lion Recovery Plan<sup>6</sup> states that “Walrus Island is the only Steller sea lion rookery still active in the Pribilofs, but pup production has declined steadily from 2,866 in 1960 to approximately 334 in 1982, 50 in 1991, 39 in 2001, and only 29 in 2005.” The 2005 census indicates that the number of pups born in the Pribilof Islands is at a critically low level. Steller sea lion pups usually remain within 500 km of their natal site during their first year.<sup>4</sup> Given the geographical isolation of the Pribilof Archipelago, the Dalnoi Point haulout is an important site for the Pribilof population during winter and thereby requires additional protection measures.

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<sup>3</sup> Sease, J.L. and York, A.E. 2003. Seasonal distribution of Steller’s sea lions at rookeries and haulout sites in Alaska. *Marine Mammal Science* 19:745-763.

<sup>4</sup> Raum-Suryan, K.L., Pitcher, K.W., Calkins, D.G. Sease, J.L., and Loughlin, T.R. 2002. Dispersal, rookery fidelity, and metapopulation structure of Steller sea lions (*Eumetopias jubatus*) in an increasing and decreasing population in Alaska. *Marine Mammal Science* 18:746-764.

<sup>5</sup> Loughlin, T.R., Sterling, J.T., Merrick, R.L., Sease, J.L., and York, A.E. 2003. Diving behavior of immature Steller sea lions (*Eumetopias jubatus*). *Fishery Bulletin* 101(3): 566-582.

<sup>6</sup> Steller Sea Lion Recovery Team. 2006. Draft Steller Sea Lion Recovery Plan, Eastern and Western Population Segments. Available at <http://www.fakr.noaa.gov/protectedresources/stellers/recovery.htm>.

- The presence of branded juvenile sea lions (*e.g.* A247 from Ugamak Island observed at South rookery, Figure 4), on St. George, in addition to re-sights of branded sea lions at other Pribilof haulouts, also indicates that St. George Island may be an important haulout at the northern extent of the species range for sea lions from other Western Stock breeding areas. In this regard, the numbers of sea lions observed at Dalnoi Point from December through April establish this site as an important haulout for the Western Stock of Steller sea lions.
- The subsistence use and cultural importance of Steller sea lions in the St. George Aleut community has been documented since the early 1800s.<sup>7,8</sup> The Traditional Council noted in its letter of March 30, 2005 that implicit in this request is the recognition by the Traditional Council that existing Steller sea lion protection measures may disproportionately impact the Aleut Community of St. George Island by placing the local sea lion population at risk. Executive Order 12898 provides that

[t]o the greatest extent practicable and permitted by law, and consistent with the principles set forth in the report on the National Performance Review, each Federal agency shall make achieving environmental justice part of its mission by identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of its programs, policies, and activities on minority populations and low-income populations in the United States.

The NPFMC is thus bound, to the greatest extent practicable and permitted by law, to identify and address the disproportionate environmental impacts of the existing Steller sea lion protection measures on the Aleut Community of St. George Island.

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<sup>7</sup> Veniaminov, Ivan. 1984 (orig. 1840). Notes on the Islands of the Unalashka District. L.T. Black and R.H. Geoghegan, transl. Richard A. Pierce, ed. Kingston, Ontario: Limestone Press.

<sup>8</sup> Veltre, Douglas W., and Mary J. Veltre. 1981. A Preliminary Baseline Study of Subsistence Resource Utilization in the Pribilof Islands Alaska Department of Fish and Game, Division of Subsistence Technical Paper No.57. Juneau.

Figure 1. Dalnoi Point. The photos show: A) 439 Steller sea lions hauled out on March 19, 2004; B) 265 sea lions hauled out on March 16, 2005; C) 200+ sea lions hauled out and in the water on January 12, 2006; D) 201 sea lions hauled out on February 23, 2006; E) 426 sea lions hauled out on March 12, 2006; and 366 sea lions hauled out on March 22, 2006.

**Photo A**



**Photo B**



**Photo C**



**Photo D.**



**Photo E.**



**Photo F.**

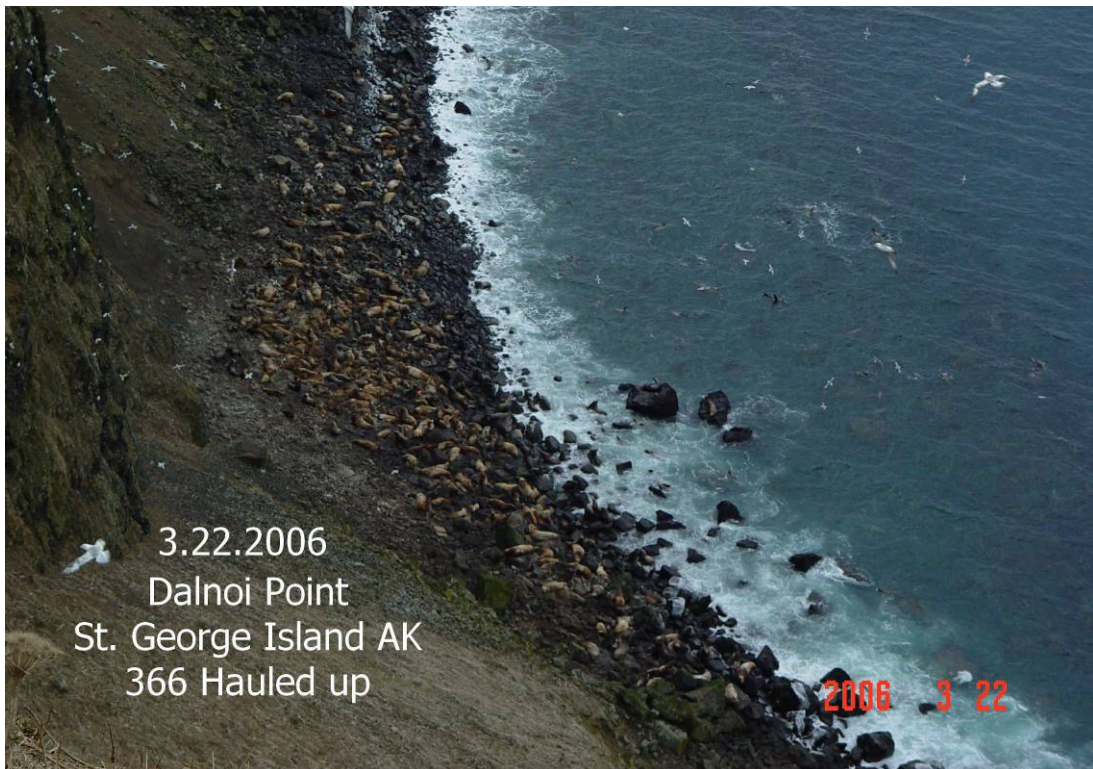


Figure 2. Dalnoi Point haulout, St. George Island on January 18, 2005. The upper and lower photos show zoomed in views of the dense section of the haulout where a number of juvenile sea lions are hauled out.





Figure 3. Tolstoi Point haulout showing 47 animals hauled out on September 4, 2004. The inset photo shows a zoomed in view of the section of the photo shown by the red box. The smaller of the two animals is a Steller sea lion pup born in 2004, most likely moved to Tolstoi Point from Walrus Island.



Figure 4. Branded Sea lion A247 at South rookery on St. George Island, August 17, 2004.

