

Introduction materials

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Brief Statement of Proposal

Provide a single, brief paragraph that concisely describes the action to be taken. Details will be specified in additional sections.

The lack of protection for the Pribilof Islands haulouts has been a concern of WWF and colleagues in the Pribilof Islands for nearly a decade. The Recovery Plan for the Steller Sea Lion states that “Because all parts of the range are currently occupied, it would be wise to maintain those populations as viable entities”. To maintain SSL in the Pribilof Islands portion of their range, extensions of CH protections are urgently needed for the largest haulout area. Such measures are also needed if increased fishing effort occurred as a consequence of the recommended closure of Aleutian Island Pacific cod fisheries in the BiOp Reasonable and Prudent Alternative (RPA). Additionally, the NMFS BiOp unfortunately grouped the Pribilofs with the eastern portion of the Aleutian Islands in a single Rookery Cluster Area, thereby diluting the serious declines at the Walrus Island rookery. This methodology should be re-examined by the SSL MC, the Council, and NMFS so that no portion of the range of SSL will be extirpated.

Objectives of Proposal

Begin with a concise statement of the problem to be addressed in the proposal, and the remedy for the problem. Provide detailed description of the proposed changes to regulations, and justification for each.

SSL used to breed on St. George, St. Paul and Walrus Island. Today the only remaining rookery is on Walrus Island. This sole remaining rookery in the Pribilof Islands is at risk of extinction. There have been no pup counts in the Pribilofs, including the declining Walrus Island rookery, since 2005. In 2005, the pup count at Walrus Island totaled 29, down from 2,866 pups born in 1960 – a 90% decline.

Dalnoi Point on St. George Island is the major SSL haul out in the Pribilof Islands. Given the geographical isolation of the Pribilof Archipelago, the winter haulout sites on St. Paul and St. George Islands are very likely to be important for the Pribilof breeding population at Walrus

Island and for young of the year during winter. Steller sea lions are using haulouts on St. George in numbers that require a greater level of protection than that which is currently provided. Without additional protection for Pribilof Islands' critical habitat, measures designed to help the declining western Aleutian sub-population may be adversely impacting the species' critical habitat and prey field in the Pribilof Islands. In other words, the RPA management measures may have pushed fishing effort into the Pribilof Islands' area, and the BiOp and the EA did not account for this.

WWF recommends the SSL MC ask the Council to:

- Extend SSL CH protection measures for important Bering Sea haulout areas in the Pribilof Islands. Specifically at St. George's Dalnoi Point, expand the closed CH to 20 nm.
- Understand whether displaced fishing effort has impacted SSL outside of the Areas 541 and 542. Recommend that NMFS consider additional protection measures for important Bering Sea haulout areas in the Pribilof Islands, especially if increased fishing effort occurred as a consequence of the BiOp Reasonable and Prudent Alternative (RPA).
- Re-examine the Rookery Cluster Area that encompasses the Pribilof Islands, examine the justification for lumping the Pribilofs with a portion of the Aleutian Islands, and recommend to NMFS that the Pribilof Islands is a unique area in the Bering Sea and should not be grouped with another Rookery Cluster Area.
- Give guidance to NMFS group and analyze rookeries so that important and significant declines in SSLs will not be washed out or go unnoticed.

Impacts of Proposal

Briefly outline the effects you think the proposed changes to management will have, including effects on Steller sea lions, other sectors of the fishery, and Aleutian Island communities.

Dalnoi Point Critical Habitat would be closed to fishing out to 20 nm to protect the prey field for SSL. This request was made by the St. George Traditional Council to the previous SSL Mitigation Committee, which in turn recommended it to the Council. The recommendation was never acted on, and protections in the Pribilof Islands for SSL continue to be lacking. With this proposed extension of CH, the original request of the St. George Traditional Council would be honored and the most important haul-out in the Pribilofs would have a protected prey field out to 20 nm.

Information on displaced fishing effort, as well as proposed mitigation measures, would be presented by NMFS to the Council and the SSL MC. NMFS would incorporate this information into the EIS, and fishery management measures would be put in place to protect SSL breeding, rearing and feeding CH in the Pribilof Islands from displaced fishing effort.

Should a new BiOp be triggered, NMFS would revise the methodology behind the Rookery Cluster Areas so that groupings of SSL that are in severe decline, such as those in the Pribilof Islands, would not be obfuscated.

Supporting data and other documentation

Provide any relevant data or other information to support your proposal.

NMFS and the North Pacific Fishery Management Council failed to recognize the extensive use of St. George Island haulouts by significant numbers of Steller sea lions when the agency adopted the current protection measures in 2003 and have yet to address this situation despite repeated requests from the St. George community. Additionally, local researchers from the St. George Traditional Council have been conducting surveys since 2003 to substantiate local knowledge that Steller sea lions are using haulouts on St. George in numbers that require a greater level of protection than that which is currently provided. Using time-lapse and remote video photography the researched has consistently recorded counts of over 400 Steller sea lions at Dalnoi Point on St. George Island from January through April of every year, and at lower numbers during the other months.

Counts of 50 to 100 Steller sea lions are also regularly observed at Kitasilox and Tolstoi haulouts on northeast St. George during the fall and winter, making these areas as some of Alaska's largest sea lion haulouts. Steller sea lions observed at these sites are not only from the Pribilof Islands, but come from areas throughout the entire Steller sea lion range. Local observations of branded Steller sea lions from Southeast Alaska, the Gulf of Alaska, the Aleutian Islands, and even Russia demonstrate the regional and global significance of these sites for Steller sea lions. The consistent presence of these animals on St. George Island underscores the need to provide adequate protection in the Pribilof Islands and to implement regular monitoring programs to evaluate the success of these measures, especially given the potential that the RPA pushed additional fishing effort into the Pribilof region.

Alternative solutions

Provide other potential solutions to the problem, if any, that the Council could consider to address the problem.

Justification for Council action

Provide an explanation of why Council action is required, and the consequences should the Council not take action.

The failure to act now could lead to irreversible losses of this top predator, with implications for broader impacts on bio-diversity and ecosystem processes.

The EA/RIR analysis of the proposed action alternatives indicates that there could be a shift in effort by the Amendment 80 fishery from Atka mackerel and Pacific cod in the Aleutian Islands to Bering Sea Pacific cod, rock sole, and yellowfin sole (page 10-35). The analysis also states that catcher vessels (page 10-43) and catcher/processors (page 10-47) could offset Pacific cod losses by increasing activity in the Bering Sea. It is likely that additional fishing effort for Pacific cod and possibly rock or flathead sole occurred in Steller sea lion critical habitat off of St. George Island, further impacting the local prey field. Figure 10-5 of the Draft EA/RIR shows that the area southwest of St. George Island is a primary target area for Pacific cod in the Eastern

Bering Sea and primary fishing areas for rock and flathead sole exist nearby. The Council and NMFS should be compelled to answer these questions now that fishing under the RPA has taken place. If it is found that additional fishing occurred in SSL CH in the Pribilof Islands, the Council should recommend additional protection measures be put in place in order to avoid additional large scale fishery closures.

NMFS must closely examine all opportunities where gains could be made in protecting Steller sea lion critical habitat, not just in the western Aleutians. Specifically, WWF endorses the proposal by the St. George Traditional Council to extend the critical habitat protection measures for the Dalnoi Point haulout that prohibit trawling for Pollock and Pacific cod within 3 nautical miles (nm) out to 20 nm. By this action, the Council and NMFS can quickly address a weakness in the existing protection measures and also mitigate likely negative impacts of the RPA on the declining Pribilof Islands Steller sea lion population.