



NORTH PACIFIC FISHERY MANAGEMENT COUNCIL

Bill Tweit, Interim Chair | David Witherell, Executive Director
1007 W. 3rd Avenue, Suite 400, Anchorage AK 99501
Phone 907-271-2809 | www.npfmc.org

August 11, 2023

NOAA-NMFS-2023-0024-0005
National Marine Fisheries Service, NOAA
Submitted via [regulations.gov](https://www.regulations.gov)

To Whom It May Concern:

The North Pacific Fishery Management Council (Council) appreciates the opportunity to comment on the Draft Conservation Plan for the Eastern Pacific Stock of Northern Fur Seal (Laaqudan¹). We support the goals of the Conservation Plan and ongoing progress with monitoring the population and developing the co-management relationship between the Aleut Community of St. Paul Island and the Traditional Council of St. George Island and the National Marine Fisheries Service, and request that the Agency dedicate funds in support of research, monitoring, and mitigation initiatives identified in the draft Conservation Plan.

The Council recognizes the value of monitoring and understanding population trends of the Northern Fur Seal (Laaqudan) in the Bering Sea rookeries to the Council's efforts to implement ecosystem-based fishery management regimes, and in particular the importance of understanding the nature of overlap between Northern Fur Seal (Laaqudan) and the fishing industry. Specifically to the Conservation Plan, the Council acknowledges the increase in response rates for Northern Fur Seal (Laaqudan) disentanglement activities that has occurred through co-management to date, attributed to funding for dedicated observers, reporting, trained individuals, and youth interns. Continued support of these and other marine debris removal activities, research, staffing, and the ability to fund dedicated observer(s) to monitor for entangled seals will result in benefits to the Northern Fur Seal (Laaqudan) population status. The Council supports the Conservation Plan prescription for ongoing monitoring of Northern Fur Seal (Laaqudan) and the degree of interaction between prey populations, Northern Fur Seal (Laaqudan) consumption and the fisheries of the region.

We believe that the Draft Conservation Plan for the Eastern Pacific Stock of Northern Fur Seal (Laaqudan) appropriately incorporates a co-management approach to Northern Fur Seal (Laaqudan) management and describes the critical need of ongoing monitoring of this unique stock, its ecosystem, and its overlap with the fisheries. We request that NMFS provide dedicated funding to support the co-management goals set forth by the conservation plan.

Thank you for considering our comments.

Sincerely,

Bill Tweit
Interim Chair, North Pacific Fishery Management Council

¹ Laaqudan means "fur seal" in Unangam Tunuu, the native language of the original inhabitants of the Pribilof Islands.