

Senate Resources  
State Capitol Rm 427  
Juneau AK, 99801

RE: Letter of Concern Resolution SJR013

March 08, 2018

Dear Senator Giessel;

I am writing to express my concern regarding important inaccuracies in Resolution SJR013. The cultural exemption under the Marine Mammal Protection Act (MMPA) for coastal Alaska Native people to harvest sea otters is not a population management tool as suggested in SJR013. There are already co-management plans for local subsistence harvest of sea otters between Alaska Native Tribes and the U.S. Fish and Wildlife Service (Service) in place that guide local actions. These plans were developed from information contained in the MMPA Stock Assessment Reports for sea otters in SE Alaska. Resolution SJR013 states that there is no management plan; that is not correct. Further, the MMPA allows for more harvest (calculated potential biological removal 2,179 sea otters) than is currently being reported by the Marking, Tagging, and Reporting program for subsistence take (447 per year average 2006-2010). If Tribes wish to harvest more sea otters to protect local shellfisheries and utilize the pelts; they all ready have that ability without permitting unrestricted harvest outside the cultural exemption.

The effort to remove management authority from the Service and transfer it to the State to co-manage hunting with an unstated Alaska Native Organization is poorly conceived and is riddled with repercussions. In an attempt to protect commercial fishery opportunities for a few in a localized areas, these actions would exclude other important cultural and economic uses of the species across the state. SJR013 is urging us to implement hunting by permit for sea otters and open legal trade and foreign export of pelts which has global implications for the fur trade and may impact the species negatively as a whole. It is true that the sea otter population is growing and recolonizing former habitat in SE Alaska, and it is also true that there are two populations that are listed as Threatened under the Endangered Species Act. Sea otters are recovering from near extirpation globally and significant population segments are not thriving here in the United States.

Regarding achieving ecological balance through targeted hunting and removal of sea otters, the SJR013 states *“a growing sea otter population appears to be contributing to ecological imbalances and diminished human subsistence and commercial harvests of Alaska shellfish*

*resources;*". The local ecology was unbalanced greatly when sea otters were extirpated from the region by unmanaged commercial hunting for pelts; the unbalance favored shellfish population growth that local regions have come to depend upon. What is not mentioned is that sea otters and coastal Alaska Native people co-existed for thousands of years prior to the commercial fur trades and the sea provided food for all. Like comments you have received from Alaska Native Tribes in SE, e.g. the Organized Village of Kake, I do not support SJR013 and believe it will harm a recovering species and negatively impact coastal Alaska communities. I urge you not to support SJR013 because it is poorly conceived and has local and global consequences. I also urge you to support existing management structures to improve sea otter population monitoring (much of which is outdated) and to encourage timely updates to the MMPA Stock Assessment reports so that there is current information publicly available. Thank you for taking time read my concerns.

Sincerely,

Angela Doroff  
Long-term resident of coastal Alaska  
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Homer, AK 99603