

## **ALASKA REGIONAL SCIENTIFIC REVIEW GROUP**

SRG members: Lance Barrett-Lennard, John Gauvin, Charlie Johnson,  
Brendan Kelly, Lloyd Lowry, Beth Mathews, Craig Matkin,  
Jan Straley, and Kate Wynne

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November 2, 2007

Dr. Bill Hogarth  
Assistant Administrator for Fisheries  
National Marine Fisheries Service  
1315 East-West Highway, Room 14564  
Silver Spring, MD 20910

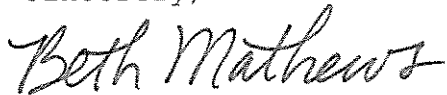
Dear Dr. Hogarth:

The Alaska Scientific Review Group (SRG) is one of three regional advisory groups created by the 1994 amendments to the Marine Mammal Protection Act. We are charged with advising the National Marine Fisheries Service (NMFS) on the assessment and status of marine mammal stocks. The Alaska SRG is aware that careful scientific studies indicate that there are more independent stocks of harbor seals in Alaska than the three currently recognized in NMFS stock assessment reports. NMFS scientists first presented the results of their extensive genetic analysis of samples from 880 Alaskan harbor seals to the SRG in fall 2000, and they published those results in a NMFS Administrative Report in August 2003. The overall findings have been confirmed in two rigorous independent peer reviews commissioned by NMFS and the Alaska Native Harbor Seal Commission in 2004. The SRG has considered all these sources of information and we have repeatedly recommended that the recently gathered data be used to establish more appropriate and scientifically-based stock units. We understand that NMFS has discussed the harbor seal stock issue extensively with its co-management partner, the Alaska Native Harbor Seal Commission. Nonetheless, annual stock assessment reports continue to treat harbor seals in Alaska as only three stocks.

Harbor seals remain an important resource to Alaska Natives, and that community works to preserve and enhance harbor seal populations and habitat and to protect indigenous seal hunting. Proper management and conservation of any marine mammal species must start with proper identification of

demographically independent units. Unfortunately, for many marine mammal taxa the data available are not adequate for making such determinations. But for Alaskan harbor seals, the efforts of NMFS, other scientists, and Alaska Native hunters have resulted in one of the most thorough genetics studies conducted on any marine mammal. We once again urge NMFS to use what is known about harbor seal population structure in their stock assessment reports, and we urge NMFS and the Harbor Seal Commission to apply this information to their conservation and management activities.

Sincerely,

A handwritten signature in cursive script that reads "Beth Mathews".

Beth Mathews, AKSRG Chair

cc: AKSRG members  
John Bengtson, NMFS  
Kaja Brix, NMFS  
Tim Ragen, MMC  
Bob Small, ADF&G