**UNITED STATES DEPARTMENT OF COMMERCE**
**National Oceanic and Atmospheric Administration**
NATIONAL MARINE FISHERIES SERVICE
1315 East-West Highway
Silver Spring, Maryland 20910

THE DIRECTOR

SEP - 8 2015

Mr. Lloyd F. Lowry
Chair, Alaska Scientific Review Group
University of Alaska Fairbanks
73-4388 Paiaha Street
Kailua Kona, HI 96740

Dear Mr. Lowry:

Thank you for your letter regarding recommendations from the February 2015 meeting of the Alaska Scientific Review Group (SRG).

I am pleased to hear that presentations and other efforts of the staff of NOAA's National Marine Fisheries Service (NMFS) facilitated review of the draft 2015 Alaska marine mammal stock assessment reports. NMFS appreciates the many valuable comments and recommendations made by the SRG during the meeting. Our responses to the SRG's written comments are addressed below.

The SRG correctly points out that there are many stocks in Alaska for which information on abundance and trends in abundance is unknown or poorly understood. The SRG further notes that there are many stocks for which human-related mortality and serious injury is not known or is poorly understood, and that NMFS appears unable to support observer programs for large, remote fisheries in Alaska that may have a low, but biologically important level of serious injury or mortality for some marine mammal stocks. NMFS recognizes that this lack of information about both abundance and human-related mortality means that the Potential Biological Removal (PBR) level process, which prioritizes marine mammal conservation efforts by comparing human-related mortality and serious injury to an index of abundance, does not work well for assessing many of the Alaska marine mammal stocks. Many of these issues were raised by the Program Review of marine mammal science conducted by the Alaska Fisheries Science Center (AFSC).

The SRG also points out that it recommended through a white paper circulated in 2011 at the Guidelines for Assessing Marine Mammals meeting that the AFSC and the Alaska Regional Office (AKRO) consider whether an alternate regime other than the PBR regime be used to manage marine mammal-fishery interactions in Alaska. The AFSC and AKRO agree that an alternative approach for managing marine mammal–fishery interactions in Alaska should be explored. The current PBR regime was developed primarily to manage serious injury and mortality of marine mammal stocks incidental to commercial fishing activities. This system works well in situations where both abundance and serious injury and mortality can be routinely and reliably obtained.

THE ASSISTANT ADMINISTRATOR
FOR FISHERIES

NMFS proposes the following actions to address the SRG's concern:

First, at the 2016 SRG meeting, NMFS staff will provide information on the system for evaluating the adequacy of marine mammal stock assessments that has been in use by NMFS for approximately ten years. While this will not solve the problem of insufficient information on abundance and human related mortality, it provides a way to communicate the level of adequacy of assessments for many stocks and may be helpful in prioritizing research.

Second, NMFS will develop a plan to collect abundance for those stocks with poor or unknown abundance estimates in response to AFSC Program Review comments made in 2015. The AFSC expects to complete this plan by June 2016 and will share this plan with the SRG at its 2017 meeting.

Third, NMFS is committed to working with the SRG and Alaska Native co-management representatives to develop practical approaches for improving stock assessments where information on abundance, trends in abundance, and annual removal levels is not available. NMFS will present results of discussions about this issue at the 2016 meeting of the SRG.

I appreciate your continued service and contributions as members of the Alaska SRG in providing advice and support to NMFS in accordance with the Marine Mammal Protection Act, and I look forward to your future recommendations to improve the science supporting the conservation of marine mammals.

Sincerely,

Eileen Sobeck

Assistant Administrator for Fisheries