



2050 VENIA MINOR ROAD  
P.O. Box 86  
ST. PAUL ISLAND, ALASKA 99660

April 29, 2015

James Balsiger  
National Marine Fisheries Service  
P.O. Box 21668  
Juneau, AK 99802

Re: *Aleut Community of St. Paul Island Petition for Rule Change*

Dear Mr. Balsiger:

Your letter dated March 3, 2015 requests certain technical clarifications relating to the Aleut Community of St. Paul Island (ACSPI) petition for amendment of the northern fur seal subsistence harvest regulations. ACSPI is working on responses to those questions and anticipates providing them to your office soon.

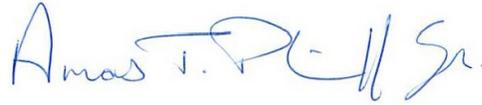
Your March 3 letter also provided an outline of the upcoming NEPA process relating to the amendment of the regulations. As you are aware, NMFS previously conducted a full Environmental Impact Statement (EIS) in 2005 relating to the subsistence fur seal harvest on St. Paul and St. George Islands. In light of that prior analysis, ACSPI believes that the upcoming NEPA review should take the form of a Supplemental EIS and incorporate the analysis of the prior EIS instead of starting over from scratch. NMFS prepared a Supplemental EIS (rather than an entirely new EIS) when it analyzed the St. George petition for amendment of the fur seal regulations in 2014. NMFS should do the same here.

ACSPI requests that NMFS immediately move forward with initiation of the supplemental NEPA process. The proceedings relating to the ACSPI petition have already been lengthy. ACSPI passed a resolution seeking modification of the fur seal subsistence harvest regulations in 2007. Following NMFS publication of its Notice of Receipt of Petition in 2012 and the receipt of public comments, ACSPI worked with NMFS to revise its proposal. ACSPI's revised proposal responded to the substantive concerns of the public comments received by NMFS. Although NMFS has asked additional technical questions in its March 3 letter about some details of the proposed amendments, the ACSPI proposal is sufficiently clear to commence the NEPA process at this time. ACSPI urges NMFS to move forward with issuance of a Notice of Intent to Prepare a Supplemental EIS on the ACSPI proposal.

OFFICE OF THE PRESIDENT

Thank you for your continued consideration and assistance. We urge NMFS to promptly move forward with the necessary steps toward final approval of the ACSPI petition.

Sincerely,

A handwritten signature in blue ink that reads "Amos T. Philemonoff, Sr." The signature is written in a cursive style with a large initial 'A' and a distinct 'Sr.' at the end.

Amos T. Philemonoff, Sr.  
President, Aleut Community of St. Paul Island

Enclosure

Provided herein is clarification for the Aleut Community of St. Paul Island's (ACSPI) intent as outlined in our revised fur seal harvest proposal for the following three allowances:

(1) Take of up to 2,000 male fur seals annually, of which no more than 1% may be comprised of incidental take of female fur seals;

(a) The ACSPI is amenable to a 2-day suspension provision when 5 females have been killed.

(b) The ACSPI is not asking for age-specific harvest levels. The annual quota will be set annually during co-management council meetings depending on community need. We do not seek a maximum permissible harvest level for each season.

(2) Take of juvenile male fur seals by hunting with firearms from January 1 to May 31;

(a) The fur seal hunt will be like the sea lion hunt, in which fur seals will be primarily shot in the water. Based on the ACSPI's sea lion hunting monitoring program, from 2007 to 2014, 19% of sea lions were shot on land and 81% were shot in the water. From 1999 to 2014, 68% of sea lions were retrieved and 32% were struck and lost. The ACSPI's real-time hunting monitoring method will be implemented for fur seal hunting, with hunters reporting to the Ecosystem Conservation Office every retrieved and struck and lost fur seal.

(3) Take by harvesting pups and juvenile male fur seals annually from June 23 to December 31.

(a) The harvest season is intended to be a dual season with both pups and juvenile males taken during the same timeframe. As stated in the Northern Fur Seal Conservation Plan (2007), the youngest males may not return to the breeding areas until mid-August or later, and some yearlings arrive as late as September or October. We do not seek to retain the current June 23-August 8 regulatory season.

(b) Yes we intend to harvest juvenile male fur seals up to seven years old. Our intention is to simplify the classification system to pups and juveniles based on the life history of northern fur seals.

(c) In 2013 we harvested four 5 year olds and one 6 year old. Our intention is to remove the restriction that only male fur seals 124.5 cm or less in length may be taken. In 2013 eleven fur seals greater than this length were harvested.

(d) Yes, all harvesting during the June 23-December 31 season will be done by current harvesting methods (i.e. round-up and stunning).