

***Southeast Alaska Subsistence  
Regional Advisory Council***

**Bertrand Adams Sr., Chair**

*kaadashan@alaska.net*

April 7, 2010

Mr. Geoffrey L. Haskett  
Alaska Regional Director  
U.S. Fish and Wildlife Service  
1011 East Tudor Road  
Anchorage, Alaska 99503

Dear Mr. Haskett:

The Council appreciates the effort you and Mr. Burns made to attend the Council meeting in Saxman on March 16, 2010. We are encouraged by your commitment to form a new partnership with the Central Council of Tlingit and Haida Indian Tribes and the Sitka Tribe of Alaska for addressing sea otter concerns. The Alaska Native Sea Otter Co-management Committee (ANSOCC) appears to be well suited to address issues associated with sea otter management in the Southeast Alaska Region. The Council also welcomes the commitment by the U. S. Fish and Wildlife Service (USFWS) to engage in an outreach program to educate users of sea otters, as mentioned in your letter to the Council on January 19, 2010.

In a March 24, 2009 letter, the Council expressed its unanimous support for a proposed study, "Ecological, economic and social changes as a result of sea otter recolonization in southern Southeast Alaska." The Council was pleased to hear the USFWS was supportive and instrumental in obtaining this funding. Thank you; completion of this study will be necessary to determine the true impact of sea otters to the communities and subsistence users we represent.

The Council continues to receive testimony on reasons for the underutilization of sea otters and the devastating affects the expanding sea otter population is having on shellfish stocks important to subsistence users and the economies of local communities. In previous correspondence, we recommended joint management plus an education program to familiarize users with current rules and are encouraged that progress is being made along those lines. The Council has several additional recommendations for consideration by the ANSOCC and the USFWS to further facilitate the subsistence use of sea otters.

**Council Recommendations:**

1. The Council recommends a thorough review of current regulations. Regulations appropriate to protect a small fragile population are likely too restrictive to encourage harvest of a robust and rapidly increasing population.

Geoffrey L. Haskett

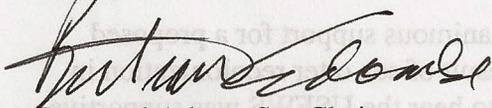
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2. Regulations need to be amended to encourage harvest when and where there is a significant level of harvest opportunity commonly referred to as potential biological removal. The use of Alaska Department of Fish and Game fishing Districts may be well suited to define area boundaries.
3. The process of tanning sea otter pelts results in a product that is certainly "significantly altered." That concept should be clearly described in regulation by amending Section 18.3 "Definitions" in the code of Federal regulations to include tanned hides as significantly altered.
4. Requiring the use of registered agents inhibits the potential utilization of sea otters. Section 18.23 (b) 1 (i) (ii) and 2 (i) (ii) "Native exemptions" should be amended to remove the requirement to utilize registered agents and allow the direct sale and transportation of sea otters by qualified users. Current language in these paragraphs is exceedingly confusing and unnecessarily restrictive.
5. There is no need for tags to remain affixed to the skin through the tanning process. Section 18.23 (f) 9 (iii) (E) should be deleted in its entirety.

Please address any questions regarding this request either directly to me or through Mr. Robert Larson, Council Coordinator, U. S. Forest Service, Box 1328, Petersburg, AK 99833, 1-907-772-5930, robertlarson@fs.fed.us.

Sincerely,



Bertrand Adams Sr., Chair

cc: Peter J. Probasco, Office of Subsistence Management  
Beth Pendleton, Forest Service Regional Forester  
Ralph E. Lohse, Chair Southcentral Subsistence Regional Advisory Council  
Speridon M. Simeonoff Sr., Chair Kodiak/Aleutians Subsistence Regional Advisory Council  
Molly Chythlook, Chair, Bristol Bay Subsistence Regional Advisory Council  
Lawrence Widmark, Chairman Sitka Tribe of Alaska  
William E. Martin, President Central Council of Tlingit and Haida Indian Tribes