



**KAWERAK, INC.**

REPRESENTING

**Brevig Mission**

*Sitaisaq*

**Council**

*Akauchak*

**Diomedede**

*Injalik*

**Elim**

*Neviarcuarluq*

**Gambell**

*Sivuqaq*

**Golovin**

*Chinik*

**King Island**

*Ugiuvak*

**Koyuk**

*Kuuyuk*

**Mary's Igloo**

*Iglaaruk*

**Nome Eskimo**

*Sitnasuami Inuit*

**Savoonga**

*Sivungaq*

**Shaktoolik**

*Saktulik*

**Shishmaref**

*Kigiataq*

**Solomon**

*Anuutaq*

**St. Michael**

*Taciq*

**Stebbins**

*Tapraq*

**Teller**

*Tupqaqruk*

**Unalakleet**

*Ujalaqtiq*

**Wales**

*Kinjigin*

**White Mountain**

*Natchigvik*

April 6, 2021

**To: Jon Kurland**

**Assistant Regional Administrator for Protected Resources, Alaska Region, NMFS,  
Attn: James Bruschi, P.O. Box 21668, Juneau, AK 99802-1668**

**NOAA-NMFS-2020-0029**

Kawerak, Inc. is a Tribal consortium composed of 20 federally-recognized Tribes in the Bering Strait region. Kawerak strives in advancing the capacity of its people and Tribes for the benefit of the region. Kawerak offers many programs to our constituents one of which is the Subsistence Resources Program advocating for subsistence resources and subsistence users. Kawerak appreciates the opportunity to comment on proposed Bearded Seal Critical Habitat.

We agree with the current critical habitat area proposed by NMFS. Bearded Seals, *ugruk or mukluk*, are found all throughout the entire Bering Sea, Bering Strait region, and northwards into the Chukchi and Beaufort seas. The distribution information has been well documented by NMFS via bearded seals instrumented with satellite-linked tracking tags that were affixed to live-captured seals (Cameron et al. 2010). Traditional Knowledge holders have also spoken of where they have found Bearded Seals in their travels, how to properly and respectfully hunt and interact with Bearded Seals, changes in Bearded seal populations over time, and other information which has been handed down from generation to generation since time immemorial. Kawerak has collaborated with many region Tribes to document this knowledge and many documents that share and reference this information can be found on our website and have been previously shared with NOAA (please see the Kawerak Social Science Program resources listed below). the NOAA satellite tracking information collected by NMFS mirrors information from Bering Strait region Elders.

In the proposed critical habitat area, we are concerned there no proposed actions to help ensure that Bearded Seals are protected from industrial maritime activities vessel traffic and, for example, the large (~1,000 ft length) ice capable Liquefied Natural Gas (LNG) carriers or multinational nuclear-powered and/or diesel powered ice breakers that now transit the Bering Strait region during winter months (Nome Nugget News, 1/29/2021; KNOM Radio, 2/19/2021).

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Bearded Seals pup in April and May and sea ice is essential for them because they give birth on top of the ice. Sea ice is also noted by NMFS as one of the key essential components to essential Bearded Seal habitat. We strongly encourage NMFS to include measures to help protect Bearded Seals pupping on sea ice from potential impacts from large vessels (including ship strikes), at any time – but especially during the spring pupping period. The current Bearded seal birthing information that NMFS relies on is good information but it was typically conducted in areas much farther north than the northern Bering Sea and Bering Strait region (in the Chukchi and Beaufort Seas) where regional and seasonal sea ice conditions, coastal geography and bathymetry, and marine ecosystems are very different. It is well-known that Bearded Seals pup on-ice in the Bering Strait region and this has been reported to NMFS by region residents and by NOAA’s Co-Management Partner, the Ice Seal Committee, for years.

We are also concerned about potential impacts to benthic-feeding bearded seals by the commercial fishing industry, in particular bottom trawling and longline fishing. Of note, the western population of Steller’s Sea Lions was once very high in the Southern Bering Sea numbering at an estimated 227,000 in the 1960’s and was reduced to 45-46,000 by 2000. One of the early contributing factors known to have contributed to the decline was commercial fishing, in particular bottom trawling. The death of Steller’s Sea Lions as bycatch is still acceptable to NMFS even though they are included on the Endangered Species List as Threatened. Our concern is that if the bottom trawlers are allowed farther northwards into the northern Bering Sea and Bering Strait region, a substantial amount of Bearded Seals will be killed as bycatch. Our northern Bering Sea and Bering Strait bathymetry is much shallower than in the southern Bering Sea and Bearded Seals would be in a much more concentrated area. Additionally, Bearded Seals commonly feed on the fishes and invertebrates that live on or near the seafloor and are much slower swimmers than Steller’s Sea Lions, making bearded seals more susceptible to bycatch mortality by bottom trawler fisheries. Potential impacts from hook injuries are also a concern due to the 2019 arrival of the large scale Pacific cod longline fleet to the northern Bering Sea and Bering Strait region. During summer 2020, unknown impacts to bearded seals, ringed seals, and many other marine mammals and other marine wildlife may have occurred during the first documented biogenic oil-fouling event at Saint Lawrence Island (Nome Nugget News, July 24, 2021) as well as the unprecedented amount of foreign marine debris - both byproducts from an increase in industrial maritime activities in the region.

Another area we strongly encourage NMFS to consider for critical habitat listing is nearshore, river mouths, and extensive inshore estuaries and lagoon systems found throughout the Seward Peninsula and Norton Sound (for example, Safety Sound, Bonanza Channel, Port Clarence, Imuruk Basin, Kotzebue Sound, and the extensive lagoon system on the north shore of the Seward Peninsula). These areas are also essential to designate as critical habitat. It is well documented by Kawerak as well as other regional coastal residents that Bearded Seals - in particular pups and sub-adults – utilize the nearshore waters, river mouths and rivers and estuarine and lagoon areas throughout the spring-summer-fall ice-free season (e.g. Kawerak 2013) NMFS also has this information readily available.

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The Kawerak Seal and Walrus mapping project shows exactly where Bearded Seal pups and sub-adults are known to occur in these environments (for example, Safety Sound east of Nome and Imuruk Basin, etc.). Bearded Seal pups and sub-adults utilize these estuaries as sheltered calmer waters during adverse weather conditions, to escape large-bodied predators like killer whales, and to hone their fishing skills in the shallow waters during the ice-free months. These estuaries have aquatic plants that Bearded Seal pups and sub-adults utilize as cover when stalking the variety of small bodied fishes and invertebrates that reside or travel through the lagoons, rivers, and nearshore waters of the Bering Strait region (for example, migrating salmon smolt, sticklebacks, etc.).

We thank you for your time and consideration on this very important matter. If you have any questions please feel free to call or email Kawerak Natural Resources Vice President Brandon Ahmasuk at (907)443-4265 or [bahmasuk@kawerak.org](mailto:bahmasuk@kawerak.org)

Sincerely,



Melanie Bahnke, President

#### Literature Cited and additional resources:

M. F. Cameron, J. L. Bengtson, P. L. Boveng, J. K. Jansen, B. P. Kelly, S.P. Dahle, E. A. Logerwell, J. E. Overland, C. L. Sabine, G. T. Waring, and J. M. Wilder. 2010. Status review of the bearded seal (*Erignathus barbatus*). U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-211, 246 p.

Nome Nugget News (Jan. 29, 2021): "Two More Russian Tankers Transit Bering Strait" <http://www.nomenugget.com/news/two-more-russian-tankers-transit-bering-strait>

KNOM radio (Feb. 18, 2021): "USCG Cutter Polar Star Completes 12-Week Deployment in Bering Strait Region" <https://www.knom.org/wp/blog/2021/02/18/uscg-cutter-polar-star-completes-12-week-deployment-in-bering-strait-region/>).

Kawerak Social Science Program resources ([www.kawerak.org/socialsci](http://www.kawerak.org/socialsci)):

- Kawerak Traditions of Respect book (<https://kawerak.org/wp-content/uploads/2018/04/Kawerak-Respect-Book-web.pdf>)
- Kawerak Seal and Walrus Hunting Safety book (<https://kawerak.org/wp-content/uploads/2018/04/Kawerak-Safety-Book.pdf>); Linkages between human health and ocean health article (<https://kawerak.org/wp-content/uploads/2018/04/Gadamus-article.pdf>);
- Policy-Based Recommendations from Kawerak's Ice Seal and Walrus project (<https://kawerak.org/wp-content/uploads/2018/04/Final-Ice-Seal-and-Walrus-Policy.pdf>);
- Oceana and Kawerak's Bering Strait marine life and subsistence use data synthesis ([https://oceana.org/sites/default/files/final\\_pdf\\_bering\\_strait\\_synthesis\\_july\\_30\\_2014\\_0.pdf](https://oceana.org/sites/default/files/final_pdf_bering_strait_synthesis_july_30_2014_0.pdf));

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- Building and Indigenous Evidence-base for Tribally-led Habitat Conservation Policies article ([https://kawerak.org/wp-content/uploads/2018/04/TEK\\_habitat\\_marine\\_policy.pdf](https://kawerak.org/wp-content/uploads/2018/04/TEK_habitat_marine_policy.pdf))
- A Bering Strait Indigenous Framework for Resource Management: Respectful Seal and Walrus Hunting article (<https://kawerak.org/wp-content/uploads/2018/04/Respectful-hunting-article.pdf>)
- An Indigenous Approach to Ocean Planning and Policy in the Bering Strait Region of Alaska article (<https://kawerak.org/wp-content/uploads/2018/09/Raymond-Yakoubian-and-Daniel-2018.pdf>)  
Seal and Walrus Harvest and Habitat Areas for Nine Bering Strait Region Communities (available from Kawerak staff).

KNOM radio (Jul. 24, 2021): “Oily substance found near Savoonga remains a mystery”  
<http://www.nomenugget.com/news/oily-substance-found-near-savoonga-remains-mystery>.

Nome Nugget News (Oct. 29, 2021): “Foreign trash continues to wash up on regional shores” <http://www.nomenugget.com/news/foreign-trash-continues-wash-regional-shores>

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