



Tungwenuk Family Qupak Design, used with permission

KAWERAK, INC.

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomedede

Injalik

Elim

Neviarcuarluk

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

Tacik

Stebbins

Tapraq

Teller

Tupqaqruk

Unalakleet

Ujalaqtiq

Wales

Kinjigin

White Mountain

Natchigvik

Date: May 14, 2024

To: Joy Baker
Port of Nome Project Manager
Sent via email to: jbaker@nomealaska.org

From: Melanie Bahnke
President, Kawerak, Inc.
PO Box 948, Nome, AK 99762

Subject: Kawerak, Inc. Public Comments on “Port of Nome Strategic Development Plan Update – Phase A Draft”

Kawerak Incorporated appreciates the opportunity to comment on the City of Nome “Port of Nome Strategic Development Plan Update – Phase A Draft.” Kawerak, Inc. is the Alaska Native non-profit Tribal consortium for the 20 federally recognized Tribes of the Bering Strait region with its main office in Nome, Alaska. Kawerak’s mission is “advancing the capacity of its people and Tribes for the benefit of the region.” Our vision is “our people and Tribes are thriving.” The foundation of that vision is a thriving subsistence culture. Protecting and continuing subsistence is our highest priority. The draft plan lacks foundational information asserting the centrality of subsistence to our region as well as including the cultural context and values of the region that the port is intended to serve. The comments and recommendations in this letter are designed to fill those gaps. Below are our comments recommendations for the “Port of Nome Strategic Development Plan Update – Phase A Draft.”

Prioritize Subsistence

Twenty federally recognized Tribes occupy the coast of the Bering Strait. The wellbeing of every Tribe is tied to the wellbeing of the marine waters and its inhabitants. A 2022 survey commissioned by Kawerak from the McKinley Research Group found that Nome Census Area residents harvested about 388 pounds per person of wild foods annually (McKinley 2022, 53). Most of these foods come from marine mammals. In the Kawerak Ice Seal and Walrus Project, participants in 2011 to 2012 “explained that subsistence foods are important for food security, are culturally preferred, and are healthier than nonnative foods. Additionally, skill and knowledge related to hunting, food preservation and preparation, and the sharing of subsistence foods are important parts of many individuals’ identity and self worth” (Oceana and Kawerak 2014, 19).

Marine inhabitants are a crucial and non-replaceable part of our food sovereignty, cultural continuity, bodily nourishment, and economic security. The Port of Nome serves as a critical launch point for subsistence users to access fish, shellfish, marine mammals, waterfowl, and

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Advancing the capacity of our people and tribes for the benefit of the region.

seabirds, which are often distributed along kinship and social networks throughout the region and beyond. The centrality of subsistence to the wellbeing of the region must be centered in the Port of Nome Strategic Development Plan, and subsistence should be considered in every section of the plan.

The plan contains a section titled "Subsistence Hunting and Fishing," yet the section only includes information on species of fish and shellfish harvested in the area. Subsistence users hunt Pacific walrus, multiple whale species, multiple ice seal species, waterfowl, seabirds, and terrestrial mammals. Subsistence users also gather eggs, greens, roots, berries, and seaweed. The full range of subsistence activities and foods that are harvested using the Port as a jumping off point, or that occurs near the Port should be included in the Strategic Development Plan.

Subsistence-focused infrastructure improvements should also be included in the plan. To improve safety and traffic efficiency, the causeway bridge passages should remain cleared for small subsistence and personal use vessels to pass through to avoid larger vessels in the outer harbor. A launch should be constructed or, at minimum, an area designated east of the eastern breakwater for launching small vessels off the beach during the shoulder season when the open water sea ice has cleared but ice remains in the harbor. Belmont Point must remain open and accessible for launching small subsistence and personal use vessels. A subsistence and personal use vessel moorage should be constructed in the Snake River mouth south of the Snake River Bridge.

Recommendations:

- Emphasize the central role the Port of Nome serves in facilitating subsistence access for Nome and the region as a foundation for Alaska Native cultural, economic, spiritual, and nutritional wellbeing.
- Consider subsistence in every section of the Strategic Development Plan.
- Prioritize subsistence access at the Port of Nome.
- Include the full range of subsistence fishing, hunting, and gathering activities and foods that are harvested using the Port of Nome as a jumping off point or that occurs near the port.
- Keep causeway bridge passages cleared for small subsistence and personal use vessels to avoid larger vessels in the outer harbor, improving safety and efficiency.
- A launch should be constructed or at least an area designated east of the eastern breakwater for launching small vessels off the beach during the shoulder season when the open water sea ice has cleared but ice remains in the harbor.
- Belmont Point must remain open and accessible for launching small subsistence and personal use vessels.
- A subsistence and personal use vessel moorage should be constructed in the Snake River mouth south of the Snake River Bridge.

Tribal Engagement

Kawerak asks that the City of Nome engage the four Nome-based Tribes throughout the development of the Port of Nome Strategic Development Plan and Port of Nome construction project. The City of Nome is one of five governments based in Nome. There are also four

sovereign Tribal governments. Tribal leaders from each of these Tribes— Nome Eskimo Community, King Island Native Community, Native Village of Solomon, and Native Village of Council—should be invited to the decision-making table regarding the Port of Nome planning and development.

Engagement and coordination between the municipality and Tribes will lead to better community outcomes. The Nome Census Area is 76 percent Alaska Native or Native American, according to State of Alaska 2022 demographic data (ADLWD 2024b). With the Port of Nome serving a majority Alaska Native or Native American population, Tribal leaders should be involved in the planning and development of the Port of Nome to ensure that the project supports the cultural and socio-economic needs of the majority population which the project serves. For example, Tribal leaders may want to offer Tribal perspectives or Traditional Knowledge of the area to shape the project in a sustainable manner. Tribes and Native corporations can establish and operate businesses to provide Port services and other economic development opportunities. Kawerak provides Tribes with business development support services and workforce training. Tribes and Native corporations have access to federal funding that is unavailable to municipal and state governments that could help the City of Nome develop the Port of Nome and the wider development needed to realize the project such as housing, water and sewage infrastructure, and social services. For example, the Native Village of Solomon and King Island Native Corporation are using federal grant funding to extend water and sewer lines to lots on East Sixth Avenue in Nome (Lionas 2024).

Engaging Tribes in decision making will also lead to better ecological outcomes. As Kawerak and Oceana stated in data synthesis of Bering Strait marine life and subsistence use: “[Tribal] communities have a vested interest in maintaining healthy environments, valuable environmental knowledge, local traditions of culturally and environmentally appropriate resource use, and an inherent right to their traditional ways of life. Hunters, elders and other residents of the Bering Strait region have extensive knowledge of the environment, and their perspectives can enrich decision making processes” (Oceana and Kawerak 2014, 16).

Kawerak, Inc. can provide guidance to the City of Nome on conducting meaningful and ethical engagement with Tribes. The city should engage with Tribes early, often, and thoroughly throughout each step of the process for developing and implementing the Strategic Development Plan. This engagement must ensure that Tribal input and Traditional Knowledge meaningfully shapes this Plan. Engagement should occur in a just and equitable manner that allows each Tribe to participate. This process will require providing information and materials to the Tribes that fosters collaboration.

Recommendations:

- That the City of Nome invite Tribal leaders from King Island Native Community, Nome Eskimo Community, Native Village of Council, and Native Village of Solomon to decision-making meetings regarding the Port of Nome Strategic Development Plan and construction project.
- That the City of Nome conducts meaningful and ethical engagement with Nome-based Tribes regarding the Port of Nome Strategic Development Plan and construction project.

Salmon

Western Alaska rivers are in the midst of multi-decadal, multi-species salmon crashes that jeopardize the food security, cultural and spiritual practices, and economic well-being of Tribes. Every single salmon is important for both subsistence harvest and escapement, particularly amid this crisis. Communities in our region have both relied on and stewarded salmon populations for millennia. Salmon are a crucial and non-replaceable part of our food sovereignty and security (ADFG 2007; Ahmasuk et al. 2008; Justin et al. 2021; Kawerak et al. 2015; Raymond-Yakoubian et al. 2017).

All five Pacific salmon species migrate through the Snake River: Chum, king, coho, pink, and sockeye. The salmon migrate in and out of the Snake River mouth at two critical stages of life—as smolt when first entering marine waters and then again as mature adults reentering freshwater to spawn. This migration spans most of the ice-free season when the port is open to shipping from May to October. Exact timing of migration changes year to year. Longtime Nome Fish Biologist and current Nome Port Commissioner Charlie Lean observed that “Salmon fry and smolt leave the Snake River freshwater habitat in the second and third weeks of June. Mature chum and pink salmon return to Snake River between 4 and 25 July, sockeyes from about 20 July to 10 August. Adult coho in-migrations are variable but generally happen in three weeks between 5 August and 10 September” (USACE 2020, 80-81). This observational data exists, but no field research data exists on how salmon use the estuarine Port of Nome area of the Snake River. There is no data on a series of factors that developers should consider, such as the residency timing and duration of anadromous fishes, environmental patterns shaping outmigration, rearing conditions, and how all these factors combine to impact survival probability. A review of estuarine ecology of juvenile salmon in Western Alaska found these data missing for most of the Arctic-Yukon-Kuskokwim region, which includes the Nome area (Hillgruber and Zimmerman 2009).

As the place where the freshwater of the Snake River meets the marine waters of the Bering Sea, the Port of Nome serves as estuarine habitat for salmon. Estuaries are among the Earth’s most productive natural areas and serve as transition zones for anadromous and other migratory fishes (Guo and Kildow 2015). Migratory fishes use of estuaries is often less understood than their marine or freshwater phases of their life cycle (Carr-Harris et al. 2015), yet estuary use can be the most critical for juvenile salmon and their growth during this period can determine whether they survive to return and reproduce (Carr-Harris et al. 2015). The temporal and spatial use of estuaries changes depending on the species of salmon and their life histories. Coho, pink, and sockeye salmon may quickly move through estuaries to enter the marine environment, while Chinook and chum may remain in estuaries for weeks or months (Carr-Harris et al. 2015).

No field research exists on the timing and duration of estuarine use by juvenile or adult life stage salmon in the Port of Nome area of the Snake River. The US Army Corps of Engineers (USACE), the federal agency designing and executing the Port of Nome expansion project, has not conducted any field research on salmon during its environmental assessment process, impeding the ability to minimize impacts of development on salmon (USACE 2020). The construction is projected to last at least seven years, and any number of circumstances could prolong that timeframe—supply chain shortages, inclement weather, labor shortages, equipment malfunctions (NOAA 2023). The construction will span multiple generations of all five Pacific salmon species. Pink salmon spawn every two years. Sockeye salmon typically spawn within

four to six years. Coho salmon typically spawn within two to four years. Chum salmon typically spawn within three to five years. Chinook salmon typically spawn within four to six years (Quinn 2018). With the region experiencing widespread, multispecies salmon declines, causing prolonged cultural and economic hardship, any adverse impacts to salmon, especially multigenerational, would exacerbate this damage and must be avoided.

Salmon escapement and subsistence salmon harvesting must not be disrupted or diminished in the Snake River due to port activities. The Snake River is the closest, most accessible location near Nome where Tribal members can harvest salmon. The location is especially important for subsistence users who do not have the means to harvest salmon further from town.

The City of Nome should partner with the USACE to map how salmon use the estuarian Port of Nome to minimize the impacts of development and port activity on salmon. The city must also ensure that fish passages in the breakwater and causeway remain passable by removing sediment as necessary.

Recommendations:

- Emphasize the importance of Snake River salmon escapement and subsistence harvest.
- State that salmon escapement and subsistence salmon harvest must not be disrupted or diminished in the Snake River due to port construction or port activities.
- Include that Snake River salmon are a valued and irreplaceable part of Tribal food security and sovereignty.
- The City of Nome should partner with the USACE to map how salmon use the estuarian Port of Nome to minimize the impacts of development and port activity on salmon.
- Ensure that fish passages in the breakwater and causeway remain passable by removing sediment as necessary.

Alaska Native Population

The Strategic Development Plan should include a land and water acknowledgement informing users of the traditional and continued stewards of the Port of Nome area and surrounding waters. These stewards are the Inupiaq, Yup'ik, and St. Lawrence Island Yupik people, three culturally and linguistically distinct peoples who have resided in the Kawerak region for millennia and who continue to thrive here. The Port of Nome mainly serves our people and builds off our legacy as the region's original mariners, a legacy which we continue, launching vessels from the Port of Nome and throughout the region.

Under "Regional Outlook" subsection "Population," the data focuses on the overall population in the Nome Census Area, North Slope Borough, Northwest Arctic Borough, and Yukon-Koyukuk Census Area in recent decades and the projected future populations for these areas. The section does not include that the majority racial demographic for each of these areas is Alaska Native or Native American, according to 2022 State of Alaska demographic data (ADLWD 2024b). This demographic data should be included to inform users of the Strategic Development Plan of the majority population that the Port of Nome is serving and to provide cultural context.

Recommendations:

- Add that the Port of Nome and surrounding waters are the traditional and continued homeland of the Inupiaq, Yup'ik, and St. Lawrence Island Yupik people, who are the traditional and present day stewards of these lands and waters.
- State under population data that the Nome Census Area is 76 percent Alaska Native or Native American, the North Slope Borough is 53 percent Alaska Native or Native American, the Northwest Arctic Borough is 80 percent Alaska Native or Native American, and the Yukon-Koyukuk Census Area is 68 percent Alaska Native or Native American (ADLWD 2024b).

Traditional Knowledge

Kawerak region Tribes have thrived for millennia in the Bering Strait from centering marine stewardship as a cultural value, allowing Tribes to feed and provide for our families and communities for thousands of years from a value system of regeneration, reciprocity, and sustainability. This value system is shaped by the understanding that the wellbeing of the region's people is tied to the wellbeing of the marine environment and marine inhabitants. Traditional Knowledge informs this understanding (Kawerak 2013; Gadamus and Raymond-Yakoubian 2015).

Kawerak defines Traditional knowledge as: “Traditional Knowledge (TK) is a living body of knowledge which pertains to explaining and understanding the universe, and living and acting within it. It is acquired and utilized by indigenous communities and individuals in and through long-term sociocultural, spiritual and environmental engagement. TK is an integral part of the broader knowledge system of indigenous communities, is transmitted intergenerationally, is practically and widely applicable, and integrates personal experience with oral traditions. It provides perspectives applicable to an array of human and nonhuman phenomena. It is deeply rooted in history, time, and place, while also being rich, adaptable, and dynamic, all of which keep it relevant and useful in contemporary life. This knowledge is part of, and used in, everyday life, and is inextricably intertwined with peoples' identity, cosmology, values, and way of life. Tradition – and TK – does not preclude change, nor does it equal only 'the past'; in fact, it inherently entails change” (Raymond-Yakoubian et al. 2017).

The City of Nome (via contractors or partners with appropriate skills and expertise) should collaborate with Tribal members to incorporate Traditional Knowledge into the Strategic Development Plan to shape a plan that is respectful for humans and wildlife, appropriate for the cultural and environmental conditions of the region, and responsive to environmental changes. Traditional Knowledge is a dynamic knowledge system. Combining Traditional Knowledge with other knowledge systems that inform city officials, port staff, and developers can lead to new insights and improvements. As Kawerak states in its policy recommendations: “Traditional knowledge is a key component of best available science. In particular, traditional knowledge is lauded for the long time period and large sample size provided by observations made repeatedly over generations, and for the detection of fine-scale features and long-term changes that are often not observed by Western science-trained resource managers. Traditional knowledge is especially important in the Bering Strait and Norton Sound region because of the paucity of Western scientific studies and the considerable experience of indigenous hunters and residents,” (Kawerak 2014).

Recommendation:

- The City of Nome collaborate with Tribal members to incorporate Traditional Knowledge into the Strategic Development Plan to shape a plan that is respectful for both humans and wildlife, appropriate for the cultural and environmental conditions of the region, and responsive to environmental changes.

Marine Stewardship

The Port of Nome should explicitly integrate the value of marine stewardship in its development plans, centering the belief that the port infrastructure is built to serve, not harm, both human and wildlife inhabitants of the region.

The Strategic Development Plan should incorporate the Port’s capabilities, responsibilities, and future vision for encouraging and enabling a healthy marine environment. More ship traffic and larger vessels moving through the Port increases the risk severity and frequency of hazardous spills and discharge contaminating the marine waters, marine inhabitants, and the people who consume marine life from subsistence and commercial harvests. These contaminants could come from fuel spills, sewage, graywater, bilge water, ballast water, galley waste, scrubber discharge, and trash.

Vessel dispersed contaminants are of heightened concern considering bioaccumulation and biomagnification of toxins in marine mammals, ongoing multispecies, multiyear salmon crashes, and recent multispecies, multiyear sea bird die offs across the Bering Sea (Williams et al, 2023; Kaler, R. et al. 2022).

The City of Nome plans to install waste reception facilities to accept and dispose of vessel waste in addition to providing shoreside power to reduce greenhouse gas emissions at port. As Port Director Joy Baker testified to the U.S. Senate Energy and Natural Resources Committee: “Intentional or unintentional discharges into Arctic waters can be minimized by the presence of a waste reception facility in the region that can accommodate both the medium-draft and deep-draft fleets transiting the Arctic” (Baker 2017, 7).

Recommendations:

- Center the value system of marine stewardship
- Highlight the port reception facilities that the City of Nome plans to install to protect Arctic marine waters.
- Include the City of Nome and State of Alaska discharge regulations for vessels using the Port of Nome.

Stakeholder and Rightsholder Interviews

The draft Strategic Development Plan includes input from interviews with eight stakeholders, who the authors describe as “community members, local businesses, and commercial and personal use fishers that actively use the Port” (Corvus et al. 2024, 26). The plan states that these interviews “allowed the City and planning team to identify key focus issues and needs for the Port of Nome” (Corvus et al. 2024, 26).

The City of Nome has a population of 3,699, according to 2020 US Census data (ADLWD 2024a). Eight people is 0.002% of the population, which is too minuscule to represent the interests, concerns, and priorities of port users or the Nome community. Eight people is an even smaller number of the region's population that the Port serves. Of the Nome Census Area's 10,046 population, eight people represent 0.0008% of the population, according to 2020 US Census data (ADLWD 2024a). The description of the included stakeholders does not include Tribal members or subsistence hunters and fishers, and the document does not list the names of the interviewed stakeholders.

A larger number of port users and community members should be included in the stakeholder interviews, and these interviews should include Tribal member rightsholders along with subsistence hunters and fishers. The document should also list the names of the people interviewed for public transparency and accountability.

Recommendations:

- Interview a larger number of port users and community members in stakeholder interviews.
- Include Tribal member rightsholders along with subsistence hunters and fishers in stakeholder interviews.
- List the names of the people interviewed for public transparency and accountability.

Climate Change

The Strategic Development Plan references climate change as a primary driver for port expansion activities as Arctic sea ice diminishes in duration, thickness, and extent, opening shipping lanes for a greater portion of the year. However, the Plan does not consider the impacts climate change may have on port activities, including Port infrastructure, the Snake River, tourism, and other economic development activities. Given climate change's role in driving the Port expansion and development, the Plan must look beyond its 20-year vision to imagine the potential and probable impacts of climate change on Port infrastructure and development activities.

Climate change is a lived reality in Western Alaska. Average regional temperatures in the Seward Peninsula are 4.6 degrees F warmer compared to averages 45 years ago, and recent studies show the Arctic warming at a rate of four times faster than the global average due to Arctic Amplification (Thoman, accessed 2023; Rantanen et. al. 2022).

The Plan should incorporate and consider potential increases in the frequency and or intensity of extreme sea levels due to storm surges and wave action, especially as a warming Arctic has already affected sea ice conditions. Average December sea ice extent in the Bering Sea has decreased by 55% from 1973 to 2022, and breakup is approximately one month earlier on average today compared to 1979 (Thoman, accessed 2024). These trends are expected to increase over the coming decade and beyond. Loss of shore-fast ice in the fall has increased the vulnerability of coastal infrastructure to damage from fall storms, including waves and higher storm surges. The impacts of declining of sea ice and increasing storm energy should be considered when planning for shoreline-adjacent or port-adjacent infrastructure development to

support Port activities, tourism, subsistence activities, or other types of community access and development.

Any construction of trails, walkways, or roads adjacent to coastal areas should include mitigation design elements to prevent significant future erosion and flooding issues due to climate change, which are projected to increase in the coming decade. Similarly, budgeting and projection for future repairs and regular maintenance should reflect current information and climate-informed projections instead of relying primarily on historical data.

The Plan should carefully examine flood projections for any development activities near the waterfront including along Front Street, in the Port, and along the Snake River. As of yet, the US Army Corps of Engineers (USACE) has not conducted any studies or projections as to how the new Port development and harbor shape will affect storm surge or flooding in Belmont Point, the Snake River, or the airport. Understanding how flood patterns will change in the area is critical to inform the development of resilient infrastructure and minimize future damage and resulting repairs. The City of Nome should work with USACE or other partners including US Geological Survey or University of Alaska Fairbanks to understand how Port design will impact storm flooding and inundation before initiating development plans in the area.

Little to no data exists on the impacts of climate-related sea level rise in the Nome area or Western Alaska although it is well understood that sea level rise varies significantly at the regional and local levels (NOAA, 2024). Land subsidence can have an even greater impact by contributing to relative sea level rise, where sinking land structures due to development, water table change, or other factors contribute synergistically with the objective sea level rise resulting in a higher relative sea level (NOAA, 2024). Rising relative sea levels can have critical implications for the long-term resiliency of coastal infrastructure and contribute to damage from flooding, inundation, erosion, and wave damage. Currently, there is zero information on how land subsidence may be impacted by construction activities or general geological activity in the region and Port area. Similarly, no information exists on projected relative sea level rise near the Port of Nome. The Plan should acknowledge this issue and seek to fill information gaps to better inform the long-term planning of the development around this critical infrastructure project to ensure its durability in the face of climate change impacts.

Recommendations:

- Incorporate technical data and climate-informed flood projections to inform development planning.
- As Arctic warming and related shipping increases are a primary driver behind the port expansion, the Plan should incorporate a climate change-conscious perspective.
- Expand the temporal frame of reference specifically to consider climate change effects that are likely to contribute to substantial infrastructure damage beyond 20-years.
- The City of Nome should partner with USACE, UAF, USGS and others as needed to gather data that will better inform planning and development activities for the Port expansion, including flood mapping, sea level rise, land subsidence, and increased storm damage resulting from sea ice loss.
- Include mitigation and resiliency as core design components in any infrastructure plans.

Cultural Tourism

The Strategic Development Plan should include a section on cultural tourism interests and opportunities in Nome and the region. Phase A of the draft plan states, “Nome’s tourism strength lies in its rich gold mining history, the unique and diverse tundra landscape, and charismatic wildlife, including muskox and reindeer” (Corvus et al. 2024, 12). Under “Recreational Activities” the document also lists birding, “winter tourism attractions (notable the Iditarod),” “cultural connections to the Bering Land Bridge National Preserve,” and “a tradition of unique local personalities” (Corvus et al. 2024, 12). The document fails to include the main reason tourists travel to Nome: cultural experiences.

Kawerak contracted the McDowell Group to produce a Nome Visitor Survey Analysis based on tourist surveys conducted by the City of Nome in 2016 and by Kawerak in 2017 and 2018. Tourists were given a selection of 14 categories to rank as “very important,” “important,” “not very important,” and “not important at all” in their decision to visit Nome. Tourists ranked “opportunity to visit an indigenous or traditional community” as “very important” more than any other category at 44%. The next highest categories ranked by 42% of tourists as “very important” were “opportunity to experience traditional ways of life,” “desire to learn about other cultures and their heritage,” and “participation in cultural events” (McDowell 2020, 8).

The tourist activities included in the draft plan ranked much lower. Only 26% of tourists ranked “opportunities for adventure, fishing/hiking/hunting/gold mining” as “very important,” and only 27% of tourists ranked “opportunity to see wildlife” as “very important” (McDowell 2020, 8).

Based on the Nome Visitor Survey Analysis, the interest and opportunities for cultural experiences is Nome’s top tourist attraction. The Strategic Plan should reflect these findings and investigate how Nome can expand and benefit from these opportunities. The draw of cultural tourism is another reason for the City of Nome to collaborate with Tribes to develop this Strategic Development Plan. The City of Nome should also collaborate with the Kawerak Katirvik Cultural Center (KCC), whose mission is “to preserve, celebrate, share and educate about the unique Indigenous knowledge and cultures of the Bering Strait Region of Alaska. KCC strives to inspire cooperative dialogue and improve cultural awareness in its communities and visitors through programs in the arts, sciences and the humanities” (KCC 2024).

The Alaska Native Heritage Center (ANHC) could serve as a resource for Nome. ANHC is developing the first statewide Alaska Native cultural tourism plan and first statewide Cultural Tourism Economic Impact Report. ANHC states, “cultural tourism in Alaska creates a space for the Alaska Native community to learn more about their own cultures by sharing our traditions, stories, values, knowledge, and ways of life” (ANHC 2024).

Artwork and crafts produced by regional residents should also be highlighted under the Strategic Development Plan’s section on “Recreation and Tourism.” Nome’s two locally owned art and gift shops should be named in this section: Maruskiya’s of Nome and Naataq Gear LLC. Both sell artwork and crafts produced by regional residents. Inupiaq, St. Lawrence Island Yupik, and Yup’ik artists have a long, rich, and distinct history of producing work from local materials such as marine mammal bone, whale baleen, walrus ivory, seagrass, driftwood, and marine mammal and terrestrial animal fur. Many local artists also produce two-dimensional art of images often

depicting the region’s landscape, wildlife, and subsistence and cultural activities. Selling locally produced arts and crafts funds and encourages local artisans and crafters to continue creating, generates economic development, and supports traditional practices important to subsistence and cultural continuity (Kawerak 2019).

Recommendations:

- Include a section on cultural tourism interests and opportunities in Nome and the region.
- Reflect the Nome Visitor Survey Analysis findings and investigate how Nome can expand and benefit from cultural tourism opportunities.
- City officials collaborate with Tribes and the Kawerak Katirvik Cultural Center to develop cultural tourism opportunities.
- City officials partner with the Alaska Native Heritage Center to better understand how to develop and market cultural opportunities in Nome for tourists in a way that strengthens Alaska Native culture and economic development.
- Highlight artwork and crafts produced by regional residents from local materials under “Recreation and Tourism” and name Nome’s two locally owned art and gift shops: Maruskiya’s of Nome and Naataq Gear LLC.

Security, Safety, and Cultural Losses

The Strategic Development Plan section “National Security and Public Safety” should be expanded to include a wider range of concerns and how those concerns could lead to cultural losses for the region’s Tribes if not mitigated (Corvus et al. 2024, 12).

As the only waterway connecting the Arctic Ocean to the Pacific Ocean, the Bering Strait is the sole corridor for both shipping traffic and migratory species moving between these waters. Marine vessel traffic through this geopolitically and economically strategic strait has doubled over the past decade and is expected to continue increasing (MXAK 2024). The Bering Strait is a biodiversity hotspot, serving as one of the world’s largest migration routes for marine mammals, a mass migration route for millions of seabirds, and home to abundant species of fish (Oceana and Kawerak 2014).

Twenty federally recognized Tribes occupy the Strait, and three live in the middle of the waterway: the Native Village of Diomedes on Little Diomedes Island and the Native Villages of Gambell and Savoonga on St. Lawrence Island. Mere miles separate the US and Russia across this strait. Little Diomedes Island is located 2.4 miles from Russia’s Big Diomedes Island. St. Lawrence Island sits 36 miles from the Russian mainland, and the US mainland at the closest point where Native Village of Wales sits is 53 miles from the Russian mainland.

Vessel traffic has increased in the Russian waters of the Bering Strait since Russia invaded Ukraine. Russia is sending more crude oil tankers through the Bering Strait to markets in Asia, particularly China, following European and US sanctions. Russia sent about a dozen crude oil tankers to China in 2023, compared with one tanker in 2022 (Widakuswara 2023). Also in 2023, Russia sent the first non-ice hardened crude oil tanker through the Northern Sea Route and Bering Strait en route to China (Humpert Sept. 2023). Vessel transits lacking ice protection is expected to increase. High North News reported in early 2023 that Russia announced plans to ship oil in vessels without ice protection through Arctic waters to Asian markets since “Russia’s

existing ice-class tankers are not large enough to routinely and economically deliver crude oil over long distances to Asia” (Humpert April 2023). The traffic is going both ways. China sent a cargo ship to Russia in 2023 through the Bering Sea and Northern Sea Route (Humpert April 2023).

Amid this increasing tanker traffic, the US Coast Guard and Russia did not hold a joint oil spill response exercise in the Bering Strait in 2023 as originally planned. Instead, the US Coast Guard conducted a solo exercise on June 7, 2023 in the Bering Strait between the communities of Diomede and Wales. Due to the presence of sea ice, the US Coast Guard deployed air assets and withheld water assets (McKenzie 2023). Despite Russia’s withdrawal from the exercise, the US Coast Guard has maintained in multiple public appearances that the joint contingency plan for transboundary pollution response between the US and Russia remains in place, requiring the US and Russia to aid each other in the event of a transboundary oil spill in the Bering and Chukchi Sea. Confidence in the effectiveness and faithfulness of a joint response would increase if the two countries participated in training exercises together.

As marine vessel traffic has increased through the Bering Strait, the U.S. has not developed a corresponding increase in supportive infrastructure to respond to the size of vessels and volume of traffic moving through the strait. It lacks the capacity to provide robust and consistent weather and environmental monitoring, oil spill response, marine debris response, and search and rescue. Both search and rescue and oil spill response organizations remain hundreds of miles away in urban centers and can only access the region by air.

As marine vessel traffic increases in the Bering Strait so too do the risks of other shipping impacts, including greenhouse gas emissions, black carbon emissions, marine debris, underwater radiated noise, risk of seabird and marine mammal strikes, conflicts between small subsistence vessels and larger commercial vessels, and vessel waste discharge. These service and infrastructure gaps must be filled since they create significant vulnerabilities for vessel operators and place the burden of risk on the marine environment and Tribal and wildlife inhabitants of the Strait, endangering food security and food sovereignty could lead to to cultural losses if not mitigated. The City of Nome has a responsibility to fill these gaps as the entity that is expanding the Port of Nome with the intention of bringing larger vessels and increased vessel traffic to Nome. The Strategic Plan should incorporate the Port of Nome’s plans for response infrastructure to help fill these gaps and avoid these risks.

Increased vehicle traffic at the Port should also be addressed in the Plan. Port construction and the potential for Graphite One mining operations would increase the number and size of vehicles using the Port. The Plan should include measures for maintaining safety for all Port users amid this increased vehicle traffic.

Recommendations:

- Incorporate the Port of Nome’s plans for services and infrastructure to respond to marine emergencies such as oil spills, marine casualties, search and rescue, and marine debris.
- Describe new and existing Port of Nome emergency response infrastructure and equipment.
- Incorporate the Port of Nome’s plans for services and infrastructure to reduce harmful impacts of vessel traffic, including greenhouse gas emissions, black carbon emissions,

marine debris, underwater radiated noise, risk of seabird and marine mammal strikes, conflicts between small subsistence vessels and larger commercial vessels, and vessel waste discharge.

- Incorporate safety measures to protect all Port users amid increases in the number and size of vehicles using the Port of Nome.

Alaska Army National Guard and Alaska State Defense Force

The Strategic Plan section “National Security and Public Safety” should include information on the current status and future plans for the Alaska Army National Guard and the Alaska State Defense Force in the region (Corvus et al. 2024, 12). The Alaska Army National Guard has a UH-60L Black Hawk helicopter and three-person air crew stationed in Nome composed of two pilots and a mechanic. The Alaska State Defense Force is working to recruit more members across the region (KNOM 2023).

Kawerak supports the state of Alaska reinvigorating the Alaska Army National Guard and Alaska State Defense Force in each Bering Strait community, training members as first responders, and providing emergency response equipment. National Guard and Defense Force members could provide immediate response and monitoring during time-sensitive emergencies that threaten life and property, including search and rescue situations, maritime accidents, oil spills, and natural disasters. They can also serve as first responders during border crossings, such as when two Russian dissidents landed on a St. Lawrence Island beach near Gambell on October 3, 2022 (Haecker 2022).

Recommendation:

- Include information on the current status and future plans for the Alaska Army National Guard in Nome and the Alaska State Defense Force in the region.

Arctic Watch Sea Traffic Management System

Kawerak, along with other partners, is working closely with the Marine Exchange of Alaska to develop Arctic Watch in collaboration with Bering Strait region Tribes and coastal communities to safeguard the waterway and its ecosystem. Arctic Watch is a sea traffic management system to track vessels and communicate with vessel operators on safe routing, environmental conditions, environmentally responsible maritime activity, and best practices. Arctic Watch builds domain awareness, helps prevent marine accidents, and coordinates with regulatory and law enforcement agencies.

The US Coast Guard sources vessel traffic data from the Marine Exchange of Alaska and supports Arctic Watch. The Alaska US Congressional Delegation also supports Arctic Watch. In March of this year, Arctic Watch received \$2,010,000 of federal funding in the Consolidated Appropriations Act 2024 in an allocation sponsored by Sen. Lisa Murkowski. The Tribal Advisory Council (TAC) of the Northern Bering Sea Climate Resilience Area also supports Arctic Watch. The TAC represents over 70 Western Alaska Native Tribes, including the Tribes of the Kawerak region. The TAC is tasked, under Presidential Executive Order, with co-managing the Northern Bering Sea with federal agencies.

Vessel transits through the Bering Strait have doubled in the past decade (MXAK 2024). As the ice-free season lengthens, traffic is expected to continue increasing as markets open and countries seek strategic Arctic positions. A sea traffic management system, developed in collaboration with Tribes and coastal communities, will help ensure safe passage and protect the health and wellbeing of the region's people, and wildlife. It provides a safeguard to ensuring that subsistence activities continue and to maintaining food sovereignty and security.

This project responds to longstanding concerns of region Tribes who have witnessed the vessel traffic increase firsthand past our communities and through traditional hunting areas. Tribes bear the burden of risk for any shipping disaster in or near the Bering Strait, from oil spills to conflicts between vessels and hunters. In 2014 and 2016, Kawerak hosted workshops where Tribal representatives called for a greater understanding of and influence over Bering Strait vessel traffic (Kawerak 2015; Kawerak 2016). Arctic Watch responds to some of those needs, providing a solution to protect the health and safety of Tribes, vessels, subsistence activities, and wildlife.

Recommendation:

- Include the Arctic Watch sea traffic management system as structure for protecting maritime health and safety in coordination with Tribes and coastal communities.

Sites of Cultural and Historical Significance

Add Sitnasuañmiut Qunuwit to the draft Strategic Development Plan port map on pg. 31. Sitnasuañmiut Qunuwit is the mass grave cemetery site where at least 170 People of Sitnasuaq were buried during the 1918 global flu pandemic (Sitnasuaq 2024). The cemetery is not located on city land but is in close proximity to the Port of Nome and should be included on the map as a site of cultural and historical significance.

Add the Snake River Spit site to the draft Strategic Development Plan port map on pg. 31. USACE archeologists and volunteers from Nome Eskimo Community, Kawerak, and City of Nome excavated the site in 2005 and 2006 during construction at the Nome Harbor for navigational improvements. USACE Archeologist Kelly Eldridge published her findings in the *Alaska Journal of Anthropology*, concluding “This site provides the first evidence of a precontact, indigenous settlement in Nome, Alaska” (Eldridge 2014, 53). The crew excavated two partial houses and part of a midden, dating the items to the seventeenth and eighteenth centuries in the Late Western Thule period. The artifacts include “harpoon heads, fixed projectile points, fishing equipment, pottery, and decorative or ceremonial objects” (Eldridge 2014, 53). Bones were also recovered representing “at least 30 different taxa and dominated by ringed seals, tundra hares, foxes, ptarmigan, and gadid fish” (Eldridge 2014, 53). Eldridge determined that the artifacts and bones “indicate that the site was potentially occupied throughout the year, with a conclusive winter habitation component” (Eldridge 2014, 66). The artifacts were transported to the Carrie M. McLain Memorial Museum in Nome for curation. The site became eligible for the National Register of Historic Places in 2009 and has since been covered by rock revetment for bank stabilization (USACE 2015, 66).

Recommendations:

- Add Sitnasuanmiut Qujuwit to the Port map on pg. 31 of the draft Strategic Development Plan as a site of cultural and historical significance.
- Add the Snake River Spit site to the Port map on pg. 31 of the draft Strategic Development Plan as a site of cultural and historical significance that provides physical evidence of pre-colonization Indigenous settlement in Nome.
- Add interpretive signage at the Port of Nome marking the cultural and historical significance of the Snake River Spit site. Signage already exists for Sitnasuanmiut Qujuwit.

Waste Disposal

Increased vessel traffic at the Port of Nome means increased human activity at the Port, which means increased waste. Kawerak notes three new toilet facilities at the Port, which is promising. How other forms of waste will be collected, transported, and disposed of is not described. If waste will be sent to the Nome landfill, an explanation of how that waste collection, disposal, and transportation will be paid for should be included.

Recommendations:

- Add a section describing user facilities such as bathrooms, waste collection, waste disposal, and waste transport at the Port of Nome to handle increased human activity.
- If waste will be sent to the Nome landfill, include an explanation of how that waste collection, disposal, and transportation will be paid for.

Dark Sky Heritage

Lighting installed at the Port of Nome should be DarkSky certified to maintain Nome's dark sky cultural heritage and minimize light pollution. Indigenous astronomy and engagement with it require continued access to a dark night sky. The night sky and knowledge associated with it is an important part of our cultural heritage and supports the passing on of oral traditions, information about seasons and wayfinding, and a variety of other important information (MacDonald 1998).

Recommendation:

- Install only DarkSky certified lighting at the Port of Nome to maintain Nome's dark sky cultural heritage and minimize light pollution.

List of References

The draft Strategic Development Plan contains in-text citations but no list of references. Excluding the reference list hides from the public where the authors sourced their information. As a public document, funded by public money, the Strategic Development Plan should include a full list of references for the sake of transparency, accountability, and intellectual integrity.

Recommendation:

- Add complete references to the Strategic Development Plan for transparency, accountability, and intellectual integrity.

Consolidated Recommendations:

Prioritize Subsistence

- Emphasize the central role the Port of Nome serves in facilitating subsistence access for Nome and the region as a foundation for Alaska Native cultural, economic, spiritual, and nutritional wellbeing.
- Prioritize subsistence access at the Port of Nome.
- Consider subsistence in every section of the Strategic Development Plan.
- Include the full range of subsistence fishing, hunting, and gathering activities and foods that are harvested using the Port of Nome as a jumping off point or that occurs near the port.
- Keep causeway bridge passages cleared for small subsistence and personal use vessels to avoid larger vessels in the outer harbor, improving safety and efficiency.
- A launch should be constructed or at least an area designated east of the eastern breakwater for launching small vessels off the beach during the shoulder season when the open water sea ice has cleared but ice remains in the harbor.
- Belmont Point must remain open and accessible for launching small subsistence and personal use vessels.
- A subsistence and personal use vessel moorage should be constructed in the Snake River mouth south of the Snake River Bridge.

Tribal Engagement

- That the City of Nome invite Tribal leaders from King Island Native Community, Nome Eskimo Community, Native Village of Council, and Native Village of Solomon to decision-making meetings regarding the Port of Nome Strategic Development Plan and construction project.
- That the City of Nome conducts meaningful and ethical engagement with Nome-based Tribes regarding the Port of Nome Strategic Development Plan and construction project.

Salmon

- Emphasize the importance of Snake River salmon escapement and subsistence harvest.
- State that salmon escapement and subsistence salmon harvest must not be disrupted or diminished in the Snake River due to port construction or port activities.
- Include that Snake River salmon are a valued and irreplaceable part of Tribal food security and sovereignty.
- The City of Nome should partner with the USACE to map how salmon use the estuarian Port of Nome to minimize the impacts of development and port activity on salmon.
- Ensure that fish passages in the breakwater and causeway remain passable by removing sediment as necessary.

Alaska Native Population

- Add that the Port of Nome and surrounding waters are the traditional and continued homeland of the Inupiaq, Yup'ik, and St. Lawrence Island Yupik people, who are the traditional and present day stewards of these lands and waters.
- State under population data that the Nome Census Area is 76 percent Alaska Native or Native American, the North Slope Borough is 53 percent Alaska Native or Native

American, the Northwest Arctic Borough is 80 percent Alaska Native or Native American, and the Yukon-Koyukuk Census Area is 68 percent Alaska Native or Native American (ADLWD 2024b).

Traditional Knowledge

- The City of Nome collaborate with Tribal members to incorporate Traditional Knowledge into the Strategic Development Plan to shape a plan that is respectful for both humans and wildlife appropriate for the cultural and environmental conditions of the region, and responsive to environmental changes.

Marine Stewardship

- Center the value system of marine stewardship
- Highlight the port reception facilities that the City of Nome plans to install to protect Arctic marine waters.
- Include the City of Nome and State of Alaska discharge regulations for vessels using the Port of Nome.

Stakeholder and Rightsholder Interviews

- Interview a larger number of port users and community members from across the region in stakeholder interviews.
- Include Tribal member rightsholders along with subsistence hunters and fishers in stakeholder interviews.
- List the names of the people interviewed for public transparency and accountability.

Climate Change

- Incorporate technical data and climate-informed flood projections to inform development planning.
- As Arctic warming and related shipping increases are a primary driver behind the port expansion, the Plan should incorporate a climate change-conscious perspective.
- Expand the temporal frame of reference specifically to consider climate change effects that are likely to contribute to substantial infrastructure damage beyond 20-years.
- The City of Nome should partner with USACE, UAF, USGS and others as needed to gather data that will better inform planning and development activities for the Port expansion, including flood mapping, sea level rise, land subsidence, and increased storm damage resulting from sea ice loss.
- Include mitigation and resiliency as core design components in any infrastructure plans.

Cultural Tourism

- Include a section on cultural tourism interests and opportunities in Nome and the region.
- Reflect the Nome Visitor Survey Analysis findings and investigate how Nome can expand and benefit from cultural tourism opportunities.
- City officials collaborate with Tribes and the Kawerak Katirvik Cultural Center to develop cultural tourism opportunities.
- City officials partner with the Alaska Native Heritage Center to better understand how to develop and market cultural opportunities in Nome for tourists in a way that strengthens Alaska Native culture and economic development.

- Highlight artwork and crafts produced by regional residents from local materials under “Recreation and Tourism” and name Nome’s two locally owned art and gift shops: Maruskiya’s of Nome and Naataq Gear LLC.

Security, Safety, and Cultural Losses

- Incorporate port plans for services and infrastructure to respond to marine emergencies such as oil spills, marine casualties, search and rescue, and marine debris events.
- Describe new and existing Port of Nome emergency response infrastructure and equipment.
- Incorporate the Port of Nome’s plans for services and infrastructure to reduce harmful impacts of vessel traffic, including greenhouse gas emissions, black carbon emissions, marine debris, underwater radiated noise, risk of seabird and marine mammal strikes, conflicts between small subsistence vessels and larger commercial vessels, and vessel waste discharge.
- Incorporate safety measures to protect all Port users amid increases in the number and size of vehicles using the Port of Nome.

Alaska Army National Guard and Alaska State Defense Force

- Include information on the current status and future plans for the Alaska Army National Guard in Nome and the Alaska State Defense Force in the region.

Arctic Watch Sea Traffic Management System

- Include the Arctic Watch sea traffic management system as structure for protecting maritime health and safety in coordination with Tribes and coastal communities.

Sites of Cultural and Historical Significance

- Add Sitnasuaŋmiut Qunjuwit to the Port map on pg. 31 of the draft Strategic Development Plan as a site of cultural and historical significance.
- Add the Snake River Spit site to the Port map on pg. 31 of the draft Strategic Development Plan as a site of cultural and historical significance that provides physical evidence of pre-colonization Indigenous settlement in Nome.
- Add interpretive signage at the Port of Nome marking the cultural and historical significance of the Snake River Spit site. Signage already exists for Sitnasuaŋmiut Qunjuwit.

Waste

- Add a section describing user facilities such as bathrooms, waste collection, waste disposal, and waste transport at the Port of Nome to handle increased human activity.
- If waste will be sent to the Nome landfill, include an explanation of how that waste collection, disposal, and transportation will be paid for.

Dark Sky

- Install only DarkSky certified lighting at the Port of Nome to maintain Nome’s dark sky cultural heritage and minimize light pollution.

List of References

- Add complete references to the draft Strategic Plan for transparency, accountability, and intellectual integrity.

Thank you

We appreciate the opportunity to comment on the “Port of Nome Strategic Development Plan Update – Phase A Draft.” Thank you for considering our recommendations, and we look forward to future robust engagement on this plan. If you have questions or concerns pertaining to this letter, please reach out to Kawerak Inc. Marine Advocate Anna Rose MacArthur at armacarthur@kawerak.org or 907-443-4368.

Sincerely,

Kawerak, Inc.



Melanie Bahnke, President

CC:

Lucas Stotts, Harbormaster, City of Nome, Alaska
Glenn Steckman, City Manager, City of Nome, Alaska
Jim West Jr., Port Commission Chair, City of Nome, Alaska
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Derek McLarty, Port Commissioner, City of Nome, Alaska
Charlie Lean, Port Commissioner, City of Nome, Alaska
Russel Rowe, Port Commissioner, City of Nome, Alaska
Gay Sheffield, Port Commissioner, City of Nome, Alaska
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