



KAWERAK, INC.

REPRESENTING

Brevig Mission

Sitaisaq

Council

Akauchak

Diomede

Iᅇaliq

Elim

Neviarcuarluq

Gambell

Sivuqaq

Golovin

Chinik

King Island

Ugiuvak

Koyuk

Kuuyuk

Mary's Igloo

Iglaaruk

Nome Eskimo

Sitnasuami Inuit

Savoonga

Sivungaq

Shaktoolik

Saktuliq

Shishmaref

Kigiqtaq

Solomon

Anjuutaq

St. Michael

Taciq

Stebbins

Tapraq

Teller

Tupqaᅇruk

Unalakleet

Uᅇalaqᅇiq

Wales

Kiᅇigin

White Mountain

Natchiᅇvik

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-2013-0114

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 Ringed Seal Critical Habitat.

We agree with the current critical habitat area proposed by NMFS. Ringed Seals are found all throughout the entire Bering Sea, Bering Strait region, and northwards into the Chukchi & Beaufort seas. The distribution information has been well documented by NMFS with the ringed seals instrumented with satellite-linked tracking tags that were affixed to live-captured seals (Kelly et al. 2010). Traditional Knowledge holders have also spoken of where they have found Ringed Seals in their travels, how to properly and respectfully hunt and interact with ringed seals, changes in ringed 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). NOAA satellite tracking information collected by NMFS mirrors information from Bering Strait Elders.

In the proposed critical habitat area, we are concerned there no proposed actions to help ensure the Ringed Seals are protected from industrial maritime activities such as 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). One of the unique features of ringed seals is they utilize subnivean sea ice lairs to protect themselves and their pups from extreme cold and predators.

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Late winter – early spring is the pupping period for ringed seals – within these subnivean lairs (Kelly et al. 2010). Sea ice is also noted by NMFS as one of the key essential components to essential Ringed Seal habitat. We strongly encourage NMFS to include measures to help protect Ringed Seals pupping on sea ice from potential impacts from large vessels (including ship strikes), at any time – but especially during the late winter/early spring pupping period. The current Ringed seal birthing and sea ice utilization information that NMFS relies on is good information but it was typically conducted in areas much farther north from the Bering Strait region (in the Chukchi / Beaufort seas) where regional and seasonal sea ice conditions, coastal geography/bathymetry, and marine ecosystems are very different. It is well-known that Ringed Seal pupping on-ice occurs in the Bering Strait region and has been reported to NMFS by residents for years as well as by the NOAA Co-Management Partner, the Ice Seal Committee.

Another area of concern we have are potential impacts to zooplankton and small-bodied fish (both prey for Ringed 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, but 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 trawl fishing is allowed to expand northwards into the northern Bering Sea region, a substantial amount of Ringed Seals will be killed as bycatch. Our northern Bering Sea/ Bering Strait bathymetry is much shallower than in the southern Bering Sea and Ringed Seals would be in a much more concentrated area. Additionally, Ringed Seals are much slower swimmers than Steller Sea Lions making Ringed seals more susceptible to bycatch mortality in bottom trawl fisheries. Potential impacts from hook injuries are also a consideration given the 2019 arrival of the large scale Pacific cod longline fleet to the Bering Strait region. Additionally, during summer 2020, unknown impacts to ringed seals and many other marine mammals and 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/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 should all be essential for ringed seals and should be designated as critical habitat. It is well documented by Kawerak and regional coastal residents that Ringed Seals - in particular pups and sub-adults – utilize the nearshore waters, river mouths, 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. The Kawerak Seal & Walrus mapping project shows exactly where Ringed Seal pups and sub-adults are known to occur in these environments (for example, Safety Sound east of Nome and Imuruk Basin, among others) north of Nome, AK. Ringed Seal pups and sub-adults utilize these estuaries as sheltered calmer waters during adverse weather conditions, to escape large-bodied predators like killer whales,

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and to hone their fishing skills in the shallow waters during the ice-free months. These estuaries have aquatic plants that Ringed Seal pups and sub-adults utilize as cover when stalking the variety of small-bodied fishes and invertebrates that reside or travel through the lagoon, rivers, and nearshore waters of the Bering Strait region (for example, migrating salmon smolt, sticklebacks, etc.). Additionally, ringed seals are known to haul out on land during ice-free conditions in certain areas of the Bering Strait region (for example, Port Clarence, Cape Espenberg, 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

Sincerely,



Melanie Bahnke, President

Literature Cited and additional resources:

B. P. Kelly, J. L. Bengtson, P. L. Boveng, M. F. Cameron, S. P. Dahle, J. K. Jansen, E. A. Logerwell, J. E. Overland, C. L. Sabine, G. T. Waring, and J. M. Wilder 2010. Status review of the ringed seal (*Phoca hispida*). U.S. Dep. Commer., NOAA Tech. Memo. NMFS-AFSC-212, 250 p.

Kawerak Social Science Program resources (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);
- 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)
- 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).

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>

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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/>).

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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