



MARINE MAMMAL COMMISSION

19 December 2023

Dr. Anne Marie Eich
Assistant Regional Administrator for Protected Resources
Protected Resources Division
Alaska Regional Office
National Marine Fisheries Service
P.O. Box 21668
709 West 9th Street, Room 420
Juneau, Alaska 99802-1668

Dr. Robyn Angliss
Cetacean Assessment and Ecology Program Leader
Marine Mammal Laboratory
Alaska Fisheries Science Center
NMFS/NOAA
7600 Sand Point Way Northeast
Seattle, Washington 98115

Dear Anne Marie and Robyn:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the draft report from the National Marine Fisheries Service (NMFS) Marine Mammal Laboratory entitled “Evaluation of Kotzebue Sound beluga whales as a proposed demographically independent population.” That document was made available for review at the December meeting of the Alaska Beluga Whale Committee (ABWC).

First, the Commission would like to commend NMFS for preparing the draft report and providing it for review by the ABWC at its December meeting, and for providing a courtesy copy to Commission staff for concurrent review. The draft report was comprehensive in its summary of multiple lines of evidence to support a designation of beluga whales in Kotzebue Sound as a demographically independent population (DIP), including: Indigenous Knowledge regarding historical and recent harvest numbers and sightings of beluga whales in Kotzebue Sound; genetic analyses of tissue and other biological samples; aerial survey and passive acoustic sampling data; and satellite telemetry data. Based on the information provided in the draft, the Commission believes there is strong evidence to support a determination that a demographically independent population of beluga whales occurred historically in Kotzebue Sound.

However, as noted by the ABWC, it is less clear which beluga stocks now occur in Kotzebue Sound, and more importantly, whether the historical stock of Kotzebue Sound belugas is still present and subject to harvest by hunters from villages in the Kotzebue Sound region¹. A genetic analysis of a small number of tissue samples obtained from subsistence-harvested beluga whales in

¹ Including the Native villages of Kivalina, Noatak, Kotzebue, Buckland, and Deering.

Kotzebue Sound in recent years was inconclusive, but suggested the continued presence of Kotzebue Sound belugas as well as one other stock of beluga whales (presumably the Beaufort Sea stock), both subject to harvest in Kotzebue Sound (O’Corry-Crowe et al. 2021). Substantial efforts have been made by members of the beluga hunting villages in the Kotzebue Sound region to develop a Tribal Kotzebue Sound Beluga Plan to limit the continued harvest of any remnant population of Kotzebue Sound beluga whales. That Plan, which has been signed by all five Tribal villages in the Kotzebue Sound region, includes the following guidance to hunters (among other provisions, as identified in ABWC (2023)):

- Avoid harvest of females, especially females with calves and young (gray) whales.
- Avoid harvest of whales from June to mid-July, when the Kotzebue Sound whales are likely to be present.
- Avoid the use of nets to harvest whales, which is more likely than other harvesting methods to catch females and calves unintentionally.
- Avoid harvest of whales from designated “safe zones” (currently identified as Selawik Lake, Kobuk Lake, Goodhope Bay, Kiwalik Lagoon, and Eschscholtz Bay).
- Encourage hunters to collect and submit genetic tissue samples (skin) from harvested whales, noting the color and sex of the whale and the date and location of the harvest.
- Designate a person in each village to record and report local sightings of beluga whales (and also killer whales, which are known to prey on beluga whales).

Unfortunately, as was discussed at the December ABWC meeting and previous meetings, there is concern that the Plan is not being followed by some of the hunters and few tissue samples are currently being collected from harvested whales. The possibility of continued harvest from an extant remnant population of Kotzebue Sound beluga whales raises the likelihood that the population, if still viable, could be extirpated by continued harvesting. This hunting pressure comes in the context of other stressors on the beluga whale population, such as predation by killer whales, access to shifting or declining prey resources related to climate change, and disturbance from sound-generating human activities.

Given the possibility that some whales from the Kotzebue Sound population remain, it is imperative that NMFS moves quickly and uses the information in the draft DIP report to designate the Kotzebue Sound population as a DIP. Ultimately, this population should be recognized as a stock under the Marine Mammal Protection Act, separate and distinct from the five other beluga whale stocks that occur in Alaska². The designation of the Kotzebue Sound population as a separate stock would raise awareness amongst hunters and potentially allow resources to be prioritized by NMFS, ABWC, the beluga hunting villages, the Alaska Department of Fish and Game, the North Slope Borough, and stakeholders to emphasize and accelerate data collection, research, and conservation actions to prevent extirpation of the stock.

The Commission recommends that the NMFS Alaska Regional Office act quickly, in coordination with the NMFS Marine Mammal Laboratory, ABWC, and beluga hunting villages in

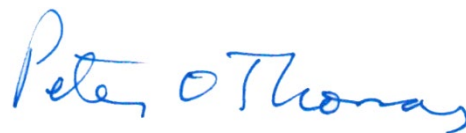
² Including beluga whale stocks in Cook Inlet, Bristol Bay, Eastern Bering Sea, Eastern Chukchi Sea, and Beaufort Sea (Young et al. 2023).

the region, to designate the Kotzebue Sound population as a separate stock of beluga whales under the Marine Mammal Protection Act. That action should be taken in consultation with Tribal Councils from each of the five Kotzebue Sound beluga hunting villages, in accordance with the government-to-government consultation provisions outlined in Executive Order 13175 “Consultation and Coordination with Indian Tribal Governments” and associated guidance documents.

The Commission also recommends that NMFS work closely with the ABWC, the beluga whale hunting villages in the Kotzebue Sound region, the Alaska Department of Fish and Game, the North Slope Borough, and other co-management partners and stakeholders, to (1) report on observations of beluga whales in Kotzebue Sound, (2) collect and analyze harvest data and tissue samples from all belugas harvested in Kotzebue Sound to continue to refine our understanding of beluga whale stocks there, and (3) encourage implementation of the conservation actions outlined in the Tribal Kotzebue Sound Beluga Plan. These actions would be facilitated by increased outreach and visits by NMFS staff to engage members of each of the Kotzebue Sound beluga hunting villages to underscore the importance of the stock designation and the conservation of a remaining Kotzebue Sound whale population. Swift implementation of these recommendations will ensure continued access to important subsistence resources for future generations of Alaska Natives.

Please let us know if the Commission can be of any help in furthering conservation efforts for beluga whales.

Sincerely,

A handwritten signature in blue ink that reads "Peter O. Thomas". The signature is written in a cursive, flowing style.

Peter O. Thomas, Ph.D.
Executive Director

cc: Mr. Tom Gray, Chair, Alaska Beluga Whale Committee
Dr. Shannon Bettridge, NMFS Office of Protected Resources
Ms. Lori Quakenbush, Alaska Department of Fish and Game
Dr. John Citta, North Slope Borough

References

- ABWC. 2023. Kotzebue Sound Beluga Newsletter: What’s up with Kotzebue Sound belugas? July 2023. <https://www.north-slope.org/wp-content/uploads/2023/11/OTZ-Newsletter-July-2023.pdf>
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Young, N.C., A.A. Brower, M.M. Muto, J.C. Freed, R.P. Angliss, N.A. Friday, P.L. Boveng, B.M. Brost, M.F. Cameron, J.L. Crance, S.P. Dahle, B.S. Fadely, M.C. Ferguson, K.T. Goetz, J.M. London, E.M. Oleson, R.R. Ream, E.L. Richmond, K.E.W. Sheldon, K.L. Sweeney, R.G. Towell, P.R. Wade, J.M. Waite, and A.N. Zerbini. 2023. Alaska marine mammal stock assessments, 2022. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-AFSC-474, 316 pages.