

MARINE MAMMAL COMMISSION
4340 EAST-WEST HIGHWAY, ROOM 905
BETHESDA, MD 20814

20 September 2007

Douglas P. DeMaster, Ph.D.
Attn: Ellen Sebastian
National Marine Fisheries Service
709 West 9th Street
P.O. Box 21688
Juneau, AK 99802-1668

Re: Bowhead Whale DEIS

Dear Dr. DeMaster:

The Marine Mammal Commission, in consultation with its Committee of Scientific Advisors on Marine Mammals, has reviewed the Draft Environmental Impact Statement on issuing annual quotas to the Alaska Eskimo Whaling Commission for the subsistence hunt of bowhead whales from 2008 through 2012. Based on our review, we offer the following comments and recommendation.

At its May 2007 meeting, the International Whaling Commission (IWC) adopted a five-year subsistence whaling quota for bowhead whales for the years 2008 through 2012. The quota allows up to 280 whales to be landed over that period, with up to 67 strikes per year and an additional 15 unused strikes in any given year to be carried over to the following year. This is the same quota that was adopted by the IWC for the previous five-year period. Native communities in Alaska and Russia share the bowhead whale quota, the Alaska Native share being 255 whales landed over the five-year period. Consistent with these provisions, the National Marine Fisheries Service proposes to authorize landings in accordance with the Alaska Native share of the IWC quota and its strike and carry-over stipulations.

The DEIS provides a thorough discussion of the status of the bowhead whale population; subsistence whaling by Alaska Natives; local, federal, and international management of the harvest; and the likely effects of whaling under the proposed quota on the bowhead whale population, the environment, and the Alaska Native whaling communities. Among other things, the DEIS notes that the most recent census of western Arctic bowhead whales, conducted in 2001, resulted in an estimated abundance of 10,545 whales. This reflects an increase of about 3.4 percent a year between 1978 and 2001. Given this abundance and trend, we believe the effect of the hunt under the proposed quota will be minor and will not prevent the regional bowhead whale population from continuing to increase toward its optimum sustainable population level. The hunt has been well managed, and the Marine Mammal Commission therefore concurs with the proposed action and recommends that the National Marine Fisheries Service adopt the bowhead whale subsistence quota as proposed.

We also note that the monitoring program for bowhead whales has done an excellent job of providing reliable information on the population's abundance and trends. Continuing this program

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is particularly important given the dramatic effects of climate change and shrinking sea ice coverage off Alaska and other arctic areas in recent years and the anticipated changes in future years. These changes will no doubt alter bowhead whale habitat, both directly and as a consequence of growing human activities in the region. Bowhead whale reproduction, nutrition, health, and survival may be affected and, for that reason, the Marine Mammal Commission also recommends that (a) monitoring efforts to assess population size and trends be maintained through the upcoming quota period, and (b) those efforts be augmented to document any future changes in health, nutrition, reproduction, and survival of bowhead whales.

Please contact me if you or your staff has questions regarding these recommendations.

Sincerely,



Timothy J. Ragen, Ph.D.

Executive Director