



Alaska Beluga Whale Committee

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Chief
Marine Mammal Division
Office of Protected Resources
National Marine Fisheries Service
1315 East-West Highway
Silver Spring, MD 20910

Dear Sir:

I am writing on behalf of the Alaska Beluga Whale Committee to comment on the draft Environmental Impact Statement for Federal actions associated with the management and recovery of the Cook Inlet beluga whales and a proposed rule to regulate the harvest of Cook Inlet beluga whales by Alaska Natives. The ABWC believes there is a serious conservation problem for belugas in Cook Inlet and fully supports designation of Cook Inlet belugas as depleted under the Marine Mammal Protection Act and development of regulations to limit the Native take of Cook Inlet beluga whales.

The most recent Cook Inlet population estimate of about 350 belugas represents a decline of approximately 50% in the last 10 years. Clearly, it is essential that mortality be reduced and important habitat protected to allow this population to recover.

High harvests have almost certainly caused or been a major contributor to the observed decline. For this reason, the ABWC thinks it is important to maintain the current level of one or two takes of Cook Inlet belugas until the population can recover. Subsistence hunting of belugas is an important part of local tradition and lifestyles, the ABWC also believes it is important to retain the possibility for a limited subsistence harvest, even while the population is recovering. It is important to note that Cook Inlet hunters agreed not to hunt belugas in Cook Inlet until the government agencies, tribal groups and the hunters had sufficient time to develop a co-management plan that would limit the harvest. This stand down was a voluntary commitment by the hunters that allowed sufficient time for NMFS to obtain designation of Cook Inlet belugas as depleted under the MMPA and thereby begin the process to control harvests of belugas in Cook Inlet.

We believe that a very small harvest of 1-2 belugas would have only a minimal effect on the recovery time for the CI beluga population, but would have a large positive effect on the cooperation and involvement of Cook Inlet hunters. It would allow Native people in the Cook Inlet region to maintain traditional ties to beluga whales. This small harvest should be managed through a co-management process, to ensure that beluga hunters are directly involved in the process and in helping the stock to recover.

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The ABWC supports regular, periodic review of information and regulations regarding the Cook Inlet beluga harvest. While we agree with the depleted listing and regulation of the harvest until the population has recovered, we also think it is important to have a review process that provides for input of the affected hunters as well as scientists and others. The ABWC recommends that information about population status and trend be reviewed and reevaluated on a regular basis, at least every 5 years. If and when the beluga population begins to increase significantly, harvest regulations should be reexamined and harvest limits revised appropriately.

One of the issues that has complicated the Cook Inlet beluga situation has been the sale of beluga whale meat and muktuk from this population. The draft regulations propose prohibiting the sale of Cook Inlet beluga whale products. The ABWC supports this prohibition but further recommends that the sale of meat and muktuk from ANY beluga, no matter what the origin, be prohibited. This does not preclude traditional trade and barter to supply local needs, but removes any financial incentive for hunting that could come from commercial sale. This will greatly simplify enforcement of the "no sale" provision and remove the need for case by case genetic testing of individual pieces of meat or muktuk to determine the stock of origin. In addition, such a prohibition will not only simplify enforcement in Cook Inlet, but will also discourage development of an "Anchorage market" for beluga muktuk and meat from other areas. The ABWC is very concerned that similar stock reductions and associated problems do not develop for other beluga stocks in Alaska.

In summary, the ABWC recommends the following:

- 1) Regulations to restrict the harvest of Cook Inlet belugas are necessary. They should be implemented through a co-management process that involves the hunters;
- 2) Even though the Cook Inlet population is greatly depleted, we recommend that a minimal harvest of 1 or 2 belugas be allowed to maintain the cooperation and traditional involvement of local Alaska Native people;
- 3) Status and trends of the population, other biological information, and also harvest regulations should be reviewed and re-evaluated on a regular basis, at least every 5 years. This review should be conducted through a public process that includes input from both scientists and hunters;
- 4) The commercial sale of all beluga meat and muktuk should be prohibited. This prohibition should include meat and muktuk from all beluga whales, not just Cook Inlet belugas. This will remove any financial incentive for harvesting Cook Inlet belugas and also belugas from other areas of Alaska.

Thank you for considering the comments of the Alaska Beluga Whale Committee.

Sincerely,



Roswell L. Schaeffer, Sr.
Chairman