

ALASKA REGIONAL SCIENTIFIC REVIEW GROUP

SRG members: Lance Barrett-Lennard, John Gauvin, Sue Hills, Charlie Johnson, Brendan Kelly, Lloyd Lowry, Beth Mathews, Craig Matkin, Jan Straley, and Kate Wynne

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Dr. Bill Hogarth
Assistant Administrator for Fisheries
National Marine Fisheries Service
1315 East-West Highway, Room 14564
Silver Spring, MD 20910

Dear Dr. Hogarth:

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The Alaska Scientific Review Group (AKSRG) is one of three advisory groups created by the 1994 amendments to the Marine Mammal Protection Act. We are charged with advising the National Marine Fisheries Service (NMFS) on the assessment and status of marine mammal stocks. The SRG is very concerned that more than a decade after stock assessments were mandated, basic data on ice-associated seals (ringed seals, bearded seals, spotted seals, and ribbon seals) are so limited that it is not possible to assess their status. The SRG last reviewed draft Stock Assessment Reports (SARs) for ice seals at our November 2004 meeting. NMFS subsequently reported that information on stock structure, minimum population size, and current population trend are not available for any of the four species, and, therefore, potential biological removals (PBR) cannot be calculated. Also, information on Alaska Native harvest and other human-caused mortality and serious injury presented in the SARs is fragmentary, and the estimates that are provided are of questionable accuracy.

For thousands of years, Alaska Natives have hunted ice seals for food, fuel, and materials for clothing and other products. Even today, ice seals continue to be of major importance to the subsistence economy of all coastal communities in western and northern Alaska. In recent years, Alaska Natives have recognized the need to expand efforts to study ice seals. They are eager to use both traditional knowledge and scientific data to assess, monitor, and conserve ice seal populations. In this regard, they have organized the Alaska Native Ice Seal Committee comprised of representatives of the coastal area from Bristol Bay to the Arctic Slope. The purpose of the Committee is to preserve and enhance ice seals, including their habitat; to protect indigenous ice seal

subsistence hunting; to protect and enhance Alaska Native culture, traditions, and activities associated with ice seals and ice seal hunting; and to undertake education and research related to ice seals. The Alaska SRG commends this effort.

A common feature of ice seals is that they depend on sea ice for important biological functions, such as pupping. Right now, the sea ice off of Alaska is changing rapidly and its suitability as seal habitat is diminishing. It is critical that properly designed studies are implemented soon so that we can document the changes that almost certainly will occur, explain their causes, and decide how to respond.

In its role of providing advice to the NMFS the Alaska AKSRG makes the following recommendations:

1. NMFS personnel should work closely with the Ice Seal Committee to develop a comprehensive plan for ice seal research that includes both traditional knowledge and scientific methods.
2. Working with Alaska Natives and in coordination with the Ice Seal Committee, NMFS should fund studies to determine whether each species of ice seal comprises more than one stock, and if so which stocks are being hunted for subsistence purposes at each village.
3. NMFS should fund studies necessary to develop reliable population estimates, or other data sufficient to assess population status, for all species/stocks of ice seals.
4. NMFS should work with the Ice Seal Committee, other Alaska Native organizations, the Alaska Department of Fish and Game, and the U.S. Fish and Wildlife Service, as appropriate, to implement a comprehensive program for monitoring and sampling the subsistence harvest of ice seals.

The Alaska SRG looks forward to working with NMFS and others to ensure that ice seals are properly managed and conserved.

Sincerely,



Elizabeth A. Mathews, AKSRG Chair

cc: John Bengtson, NMFS; Kaja Brix, NMFS; Senator Ted Stevens; Senator Lisa Murkowski; Representative Don Young; U.S. Senate Committee on Commerce, Science, and Transportation; U.S. House Committee on Natural Resources