

ICE SEAL COMMITTEE

DESIGNATION OF CRITICAL HABITAT FOR ARCTIC RINGED SEALS

PUBLIC HEARING TALKING POINTS

NMFS wants to know:

- Habitat use of ringed seals
- The identification, location, and quality of physical or biological features essential to the conservation of ringed seals
- Potential impacts or benefits of the proposed designation including particular areas that they are proposing for designation should be considered for exclusion under ESA Section 4(b)(2) and why
- Traditional knowledge of ringed seals as it relates to critical habitat and areas that may not be critical habitat

ISC Talking Points

- Coastal erosion projects are needed to protect lands that are important to coastal communities and residents, and may alter arctic ringed seal habitat
- Community and economic development will be harmed by creating critical habitat near coastal communities
- The ISC believes that the Arctic sea ice environment is critical to the health of the global ringed seal population, as well as the health of the prey that ice seals utilize
- We don't know how seals will respond to the changing environment they utilize
- Proposed rule will have potentially devastating impacts on coastal economies and cultures of Alaska Native people

- We urge NMFS to consider a more limited designation of critical habitat
- The traditions of Alaska Natives who rely on the arctic ringed seal views all aspects of the Arctic environment as interdependent, and the traditional concern for the preservation of their environment necessarily encompasses a vital interest in ensuring the arctic ringed seals' continued survival.
- The heavy burden of the proposed critical habitat designation will fall on our coastal communities. NMFS must revise the proposed designation to avoid a disparate impact on Northern Alaska and the Alaska Natives who will be predominantly affected.
- Alaska Natives living in coastal communities have lived for millennia in close proximity with arctic ringed seals.
- There will be cumulative impacts with other proposed listings and will impose a tremendous burden of life in Alaska for coastal communities. Different species have different needs, such as seasonal protections and some species needs may be in conflict.
- The proposed designation will adversely affect Native cultures and villages. Our culture is not something preserved under a bell jar, nor is it simply a matter of continuing subsistence hunting and crafts. While certain traditional activities are preserved by the ESA exemption under Section 10(e), 16 U.S.C. 1539(e), our culture is a broader, integrated form of life. Coastal communities rely upon interaction and communication among villages and communities in maintaining cultural activities. Sea ice in some regions is used as transportation corridors between villages, and from villages to hunting camps, and other widely dispersed locations. There is regular and essential travel among villages that preserves our culture and our livelihoods. This level of inter-village transit exists on equal or greater terms for the other four regions bounded by the proposed designation, potentially involving scores of villages and cities.

- The proposed designation includes the entire maritime zone between the U.S.-Canadian border and a point southwest of Nunivak Island. This constitutes the only route for commercial shipping to coastal communities. The vast majority of goods and services are transported to and from these communities by vessel. The sea is our life-line to the rest of the country and world, and we must have open transportation lanes. Federal agencies must know the importance of the annual line haul barges, as tugboats hauling barges use the open water season to from village to village bringing the necessities of life. From approximately mid-June in some regions, through September, this shipping not only brings (and takes away) goods, but serves as a cultural link among coastal Alaska Native communities. Everything from baby food to snow machines must arrive by commercial shipping along the entire coastline where proposed critical habitat is to be designated. We do not think it is necessary to restrict commercial shipping via sea traffic during the open water period in order to protect the arctic ringed seal.
- The ISC appreciate the effort that NMFS has made to protect and conserve arctic ringed seal populations and other species dependent on our Arctic and sub-Arctic environment. The coastal communities in the proposed designation are the most directly affected and we must insist on greater involvement in the decision-making process. No people in the world know more about, or are more dependent on, the Arctic and sub-Arctic ecosystem and its unique wildlife species than the residents of the coastal communities. Many of our citizens are participants in co-management organizations and conservation efforts and are very active in circumpolar scientific, cultural, and educational initiatives related to indigenous wildlife species of all kinds.
- Alaska Native subsistence hunters have unique expertise and regular interactions with the arctic ringed seal as they have the traditional knowledge of their habitat and know and when not to hunt.
- The proposed designation is excessively large and the burdens of critical habitat designation will fall most heavily on the coastal communities. Activities in these coastal communities in Alaska are not the source of the

perceived threat to arctic ringed seals. We are not responsible for and cannot control global climate change that NMFS has concluded threatens arctic ringed seal habitat.

- The sea-ice habitat and the area proposed as critical habitat is also used by other species important to Alaska Native subsistence hunters. Polar bears, bearded seals, spotted seals, beluga whales, bowhead whales, and walrus are some of the marine mammals that are harvested to feed our families. Some of these species migrate along the open leads in the spring time as they head to their summer feeding grounds.
- The North Slope Borough, which manages the Ice Seal Committee grant from NMFS, historically has been involved in marine mammals management and conservation efforts. The NSB has been actively engaged in ESA conservation and recovery planning efforts for polar bears, bowhead whales, stellers' and spectacled eiders. The NSB expects to continue and participate in these efforts into the future.
- Alaska Natives living in coastal communities are an important and essential partner for any efforts to conserve arctic ringed seals and its habitat. Alaska Natives and their ancestors have been the primary conservation stewards for thousands of years, carefully balancing subsistence needs and cultural traditions with a profound respect for arctic ringed seals and other wildlife that share their habitat.
- It is understood that arctic ringed seals need places to eat, travel, rest, and breed, but designating vast expanses of the U.S. range of the arctic ringed seal because these behaviors occur somewhere within this huge area seems ridiculous.
- For thousands of years, Alaska Natives in coastal communities have relied upon ice seals for subsistence purposes. Although the vast majority of impacts on seal habitat derive from activities well away from our communities, our people will face the most direct impacts from any designation of critical habitat.

- Given our special relationship with ice seals, our people have the most direct and current knowledge of arctic ringed seal habitat, numbers, health, behavior, and activity on and adjacent to Alaska coastal communities.
- The NSB has a significant amount of knowledge and data regarding the location of essential physical and biological features for arctic ringed seal, the economic consequences of designating critical habitat, and the need for special management measures.
- At this time it is well-established that arctic ringed seals are dependent upon sea ice. Based upon our observations, the primary habitat feature relied upon by these seal species is offshore sea ice, which provides a platform for resting, hunting, mating, pupping, and molting. Arctic ringed seals are not dependent upon near-shore or coastal habitat areas. Accordingly, NMFS should only consider designating those areas containing offshore sea ice as critical habitat.
- Based upon the potential for disturbance and anthropogenic effects, any arctic ringed seal habitat areas located proximate to areas of human activity would not contain those features essential to the conservation of the species. NMFS should not designate any areas affected by human development or other activities as critical habitat. For example, NMFS should not include North Slope villages, and the areas surrounding them, in any critical habitat designation.
- The primary feature essential to the conservation of arctic ringed seals is offshore sea ice. Because this habitat requires no special management consideration or protections, it does not satisfy the criteria for designation as critical habitat. The existing MMPA and ESA requirements are already more than sufficient to avoid potential destruction or adverse modification of arctic ringed seal habitat. The Ice Seal Committee provides for the conservation and management of arctic ringed seals through the Ice Seal Management Plan, which includes habitat protection as one of its primary goals.

- The Arctic subspecies of ringed seal is genetically diverse, widely distributed throughout the vast area of its range, currently healthy, and numbers in the millions. To present, no reduction of the Arctic ringed seal has been observed, estimated or inferred. There are no data documenting an adverse impact to the Arctic ringed seal from the effects of climate change. There are no data documenting how the arctic ringed seal will respond to projections of future climate change, including potential habitat loss, in the Arctic.
- The magnitude of Arctic climate change is uncertain, but there are projections that the Arctic climate will warm and that sea ice will decline in extent and thickness in the future. However, there is great uncertainty regarding the biological responses of arctic ringed seals that are likely to follow any physical changes to Arctic habitat or the potential acidification of the oceans. Accordingly, the nature and magnitude of the biological responses of Arctic ringed seals that may result from the possible consequences of climate change or acidification of the oceans are highly uncertain.
- When ice breakers are out there breaking up ice, isn't that supposed to be critical habitat, and they are destroying what NMFS is trying to protect?
- Need maps to document where the sea ice is, and where critical habitat should be designated near off-shore areas by coastal communities.
- The timing of where critical habitat designations are when the sea ice is actually being used for birthing, pupping, lairing, etc. Each region will be different and where the sea ice is, the timing of these biological factors are important to consider.
- In the winter, near-shore places are used by arctic ringed seals, where the ice has ridged (pressure ridges formed), so we have to be sure to state that when the sea ice is used, and when we think it is critical to the seals.