



c/o NSB Dept. Wildlife Management  
P.O. Box 69  
Utqiagvik, Alaska 99723  
Acting Chairman Leonard Barger (907) 759-3454

Jon Kurland  
Regional Administrator  
NOAA Fisheries Alaska Region

8 April 2026

Dear Mr. Kurland:

The Alaska Beluga Whale Committee (ABWC) received the final document titled “Evaluation of beluga whales in Kotzebue Sound, Alaska, as a demographically independent population” (Shelden et al. 2026). We greatly appreciate NOAA’s response to our request to consider Kotzebue Sound beluga whales as a “demographically dependent population” (DIP) and to follow up with an evaluation of a stock determination. The ABWC recognizes that NOAA considered and included our comments on the draft documents.

If belugas in Kotzebue Sound are designated as a DIP and then a stock, it will raise awareness that this is a unique group of animals that is hunted for food and important to the communities of Kotzebue Sound. This designation is important and could begin the recovery of belugas in the Sound. As you know, at our 2025 annual meeting, ABWC delegates passed a motion to recognize Kotzebue Sound beluga whales as a DIP and a stock due to the long history of importance to the people of Kotzebue Sound.

**“Because the best available and most recent science and indigenous knowledge recognize Kotzebue Sound belugas as being separate and distinct group of animals and because beluga hunting villages including elders and hunters drafted a management plan to help recover the belugas, I move that the ABWC recognizes Kotzebue Sound belugas as a DIP and stock, and strongly encourage the NMFS to do so also.”**

Motion by Robert Suydam. Seconds by Raymond Lee (Buckland) and Clifford Kaganak (Scammon Bay). Roll call vote results: 22 Yes, 0 No, 5 Abstained

The ABWC endorses the finding that these belugas should be recognized and managed as a stock. A decision to recognize these animals as a distinct stock will be beneficial to promoting the recovery of beluga whales in Kotzebue Sound.

Sincerely,

Leonard Barger  
Acting Chairman

Cc: Nancy Friday, NOAA Fisheries, Alaska Fisheries Science Center  
Robyn Angliss, NOAA Fisheries, Alaska Fisheries Science Center  
Anne Marie Eich, NOAA Fisheries, Alaska Regional Office  
Jill Seymour, NOAA Fisheries, Alaska Regional Office

Reference:

Shelden, K.E.W., Young, N.C., Mahoney, B.A., Parsons, K.M., Castellote, M., Brower, A.A., Angliss, R.P., Bengtson, J.L., and Friday, N.A. 2026. Evaluation of beluga whales in Kotzebue Sound, Alaska, as a demographically independent population. U.S. Department of Commerce, NOAA Technical Memorandum NMFS-AFSC-511, 51 p