

Eskimo Walrus Commission  
Kawerak, Inc.  
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February 23, 2024

Mr. Jon Kurland  
Regional Administrator  
NOAA Fisheries-Alaska Region  
PO Box 21668  
Juneau AK 99802-1668

Re: NBS Effects of Trawling Study (NETS)

On behalf of the Eskimo Walrus Commission, I offer this letter opposing the NBS Effects of Trawling Study (NETS) and supporting the resolutions of The Tribal Government of St. Paul Island, Kawerak, Inc., the Association of Village Council Presidents, and the Bering Sea Elders Group.

The Eskimo Walrus Commission (EWC) represents nineteen coastal communities and is committed to the conservation of the Pacific walrus and the protection of Alaska Native communities' right to harvest walrus for their Indigenous Food Security and represents those interests as the co-management partner of the U.S. Fish and Wildlife Service. This research project constitutes a clear threat to the critical habitat around St. Lawrence Island and south to St. Matthew Island both in its method of destructive trawling and in its goal of expanding commercial bottom trawl fisheries.

The justification for this study is solely focused on commercial fisheries interests. It is looking forward to expanding commercial fishing into an Arctic ecosystem of Pacific walrus, seabirds, ice seals, and whales. This is critical habitat to Pacific walrus as wintering and breeding areas enriched by the St. Lawrence Island polynya. It remains vital to the survival of many Arctic species, most of which are essential to Alaska Native culture and food security. The multitude of impacts brought to the Pacific walrus population by climate change continue to increase. We cannot stop sea ice melt or the spread of harmful algal blooms, but we can regulate human activity that disrupts or damages the walruses' life cycle, feeding, and survival. This research proposal falls into this category.

As a tribal member of the Native Village of Savoonga, I believe the homeland and waters of St. Lawrence Island are sacred and eternal. They have provided for us for thousands of years even during periods of environmental change. Our Indigenous Knowledge—*Liisimalleghput* holds that our relationship with the gifts of the Creator are to be cherished and respected and, if not, we are not worthy of future harvests. We are very concerned for the future of our Indigenous Food Security and way of life—*Nangaghneghput* as industrial development of commercial fisheries spreads into habitat conservation and marine protected areas.

#### Member Communities

Brevig Mission | Gambell | King Island | Kivalina | Kotzebue | Kwigillingok | Little Diomed  
Manokotak | Mekoryuk | Nome | Point Hope | Point Lay  
Savoonga | Shishmaref | Stebbins | Unalakleet | Utqiagvik | Wainwright | Wales

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Again, on behalf of the Eskimo Walrus Commission and for these reasons and others presented by concerned Alaska Native Organizations, I oppose the NBS Effects of Trawling Study (NETS) and recommend that commercial fishing interests not be prioritized over those of Alaska Native communities that could be negatively impacted.

Sincerely,



Vera Metcalf  
Executive Director  
Eskimo Walrus Commission

Cc. Charlie Brower, Chair, Eskimo Walrus Commission  
Melanie Bahnke, President, Kawerak, Inc.

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