



c/o North Slope Borough - Department of Wildlife Management  
PO Box 69, Utqiagvik, AK 99723

July 22, 2025

The Honorable Nick Begich  
153 Cannon House Office Building  
United States House of Representatives  
Washington, DC 20515

**Re: Insufficient Engagement with Federally Authorized Alaska Native Co-Management Partners on Proposed Amendments to the Marine Mammal Protection Act**

Dear Representative Begich,

As the Executive Manager of the Ice Seal Committee (ISC), I am writing to express my concerns regarding the process by which the currently proposed amendments to the Marine Mammal Protection Act (MMPA) have been developed and advanced. These amendments have significant implications for Alaska Native communities and the Alaska Native subsistence harvest of marine mammals. However, there has been no coordination with the ISC or other co-management organizations on these amendments, leaving those most affected with essentially no time to evaluate the proposed amendments and/or to respond in any meaningful manner.

The ISC is the federally recognized Alaska Native co-management organization, established under Section 119 of the Marine Mammal Protection Act, that represents the knowledge, interests, and stewardship responsibilities of Alaska Native hunters and communities who rely on ice-associated seals for their cultural, nutritional, and economic well-being. The ISC's mission is to ensure that subsistence opportunities remain available for future generations through the conservation and sustainable management of ice seal populations. The ISC also maintains a longstanding, collaborative relationship with both the National Marine Fisheries Service and industry partners to address management challenges in a balanced and responsible manner.

Despite the ISC's formal status and decades of experience in cooperative management, our awareness of these amendments came only informally—"through the grapevine"—and with extremely limited time to prepare a response ahead of the July 22 hearing. This lack of outreach and engagement is deeply troubling and reflects a serious flaw in the legislative process.

The exclusion of co-management organizations such as the ISC from early and substantive involvement in this process disregards the extensive ecological, cultural, and logistical expertise that we and other co-managers have to contribute—expertise that is vital to shaping effective and equitable marine mammal policy. It also undermines the intent of Section 119 of the MMPA, which explicitly affirms the importance of cooperative governance between the federal government and Alaska Native organizations.

As such, after today's hearing and before the draft bill advances further, I respectfully request that your office, and other members of the House Committee on Natural Resources, engage with

federally recognized Alaska Native co-management organizations—including the ISC—and provide them with meaningful opportunities to participate in the legislative process. This should include timely notifications, comprehensive briefings, and adequate time for thoughtful review and input.

The ISC remains committed to good-faith collaboration and dialogue with our federal partners. That commitment, however, depends on a process that is rooted in respect, inclusion, and transparency. We look forward to working with you and your office to ensure that the voices, comments, and concerns of Alaska Natives and our co-management organizations are fully heard and addressed should this draft bill move forward.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew L. Von Duyke".

Andrew L. Von Duyke, PhD  
Executive Manager Ice Seal Committee

Cc: The Honorable Lisa Murkowski  
The Honorable Dan Sullivan  
Indigenous People's Council for Marine Mammals  
Marine Mammal Commission  
Alaska Eskimo Whaling Commission  
Alaska Nanuut Co-management Commission  
Eskimo Walrus Commission  
Alaska Beluga Whale Committee  
Aleut Community of St. Paul Island  
Ice Seal Committee Board Members