



Bering Sea  
Elders Group



Date: May 23, 2024

To:

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Office of Science and Technology Policy  
Executive Office of the President  
Eisenhower Executive Office Building  
1650 Pennsylvania Avenue  
Washington, DC 20504  
*Sent via email to: [Tricia.M.Light@ostp.eop.gov](mailto:Tricia.M.Light@ostp.eop.gov)*

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**RE: Alaska Native Tribal Comments and Recommendations Regarding Marine CDR Research**

Dear Ms. Light,

We—Kawerak, Inc., the Association of Village Council Presidents (AVCP), the Aleut Community of St. Paul Island, and the Bering Sea Elders Group—thank you for the opportunity to provide public comment to the White House Office of Science and Technology Policy (OSTP) in regards to the federal government’s plan to develop a research program for marine carbon dioxide removal (CDR), a program that could significantly impact our communities, environment, and ways of life. We are maritime Peoples, meaning our well-being is tied to the well-being of the marine waters and their inhabitants. For us, an abundant and healthy ocean ecosystem is a crucial and irreplaceable part of our food sovereignty, cultural continuity, bodily nourishment, and economic security. Guided by a value system of reciprocity and sustainability, we have served as stewards of our marine waters and animals since time immemorial, long before the United States declared nationhood over the region now called Alaska. It is our position that the United States *must* embrace these values as co-stewards of our waters as we jointly develop a federal marine CDR research plan and consider as a wider society how to steward, nurture, and sustainably use the ocean commons. Since our Peoples will bear the consequences of any impacts on the ocean, decisions must be made with, not for, Tribes and Tribal organizations.

Writing collectively on this issue of common concern, we first wish to describe in more detail the positions of our four Bering Sea-adjacent Tribal organizations, who together represent one third of Alaska’s 229 federally-recognized Tribes.

Kawerak, Inc. is the Alaska Native non-profit Tribal consortium for the 20 federally recognized Tribes of the Bering Strait region with its main office in Nome, Alaska. Kawerak’s mission is “advancing the capacity of its people and Tribes for the benefit of the region.” Our vision is “our people and Tribes are thriving,” with an emphasis on living Iñupiaq, St. Lawrence Island Yupik, and Yup’ik subsistence cultures, which depend on a healthy and productive marine environment.

The Association of Village Council Presidents (AVCP) is the Alaska Native non-profit Tribal consortium for the 56 federally recognized Tribes of the Yukon-Kuskokwim Delta region with its main office in Bethel, Alaska. AVCP’s mission is, “*Yuput calillgutekluki elluarrluta yuulluallerkamtenun*”, which in English translates to “Working together with Tribes to enhance sovereignty, self-sufficiency and Our Way of Life.” The AVCP region of Alaska is approximately 58,000 square miles in size (comparable in size to the State of New York) and is named for the two largest rivers: the Yukon and Kuskokwim. AVCP’s 56 member Tribes are spread across 48 communities and two U.S. Census areas: the Bethel Census Area and the Kusilvak Census Area, with most of the communities located along the rivers and the coast. These rivers are an incalculably important resource for our communities, as the primary transport corridor among villages and to the sea, and as a source of nourishment and habitat for fish, terrestrial wildlife, marine mammals, and migratory birds.

The Aleut Community of St. Paul Island (ACSPI), is the title by which the federal government formally recognizes our Tribal sovereignty: a Nation born, living, and self-governing before the United States was conceived. Our Tribal Government is the venue through which Unangax of St. Paul Island can fulfill our intrinsic rights and responsibilities and support, recollect, practice, and pass on our culture. The ACSPI Tribal Government promotes, maintains, and protects the cultural practices, Traditional Knowledge, food sovereignty, self-governance, and self-determination of the Tribal members of ACSPI.

The Bering Sea Elders Group (BSEG) is a Tribal consortium that was formed specifically to work to protect the Bering Sea. BSEG's mission is to speak and work together as one voice to protect and respect our traditional ways of life, the ocean web of life that supports the resources we rely on, and our children's future. BSEG is an organization of 38 federally recognized Tribes from Kuskokwim Bay to the Bering Strait. BSEG's Elder Representatives were selected by their Tribal councils and are messengers to our children, and the people who make decisions that affect our marine resources, ecosystem, and ways of life. BSEG has long worked in coalition with its partner organizations listed above on efforts that relate to activities in the central and northern Bering Sea.

In this letter, we appreciate the opportunity to elevate the collective Indigenous and Traditional Knowledge held by our Tribal citizens across Western Alaska. As highlighted in the memorandum released by OSTP and the Council on Environmental Quality (CEQ) in 2021, Indigenous knowledges are “one of the many important bodies of knowledge that contributes to the scientific, technical, social, and economic advancements of the United States and to our collective understanding of the natural world.”<sup>1</sup> The guidance document for Federal Departments and Agencies on Indigenous knowledges clearly states that our Tribal knowledge is a valid form of evidence for inclusion in Federal policy, research, and decision-making.<sup>2</sup> This document goes on to elaborate on many different mechanisms for ensuring Tribal governments and communities are adequately included in decision-making processes, research, and policy.

Kawerak defines Traditional Knowledge (TK) as: “a living body of knowledge which pertains to explaining and understanding the universe, and living and acting within it. It is acquired and utilized by indigenous communities and individuals in and through long-term sociocultural, spiritual and environmental engagement. TK is an integral part of the broader knowledge system of indigenous communities, is transmitted intergenerationally, is practically and widely applicable, and integrates personal experience with oral traditions. It provides perspectives applicable to an array of human and nonhuman phenomena. It is deeply rooted in history, time, and place, while also being rich, adaptable, and dynamic, all of which keep it relevant and useful

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<sup>1</sup> OSTP & CEQ, Memo. on Indigenous Traditional Ecological Knowledge & Federal Decision Making (Nov. 15, 2021), <https://www.whitehouse.gov/wp-content/uploads/2021/11/111521-OSTP-CEQ-ITEK-Memo.pdf>.

<sup>2</sup> OSTP & CEQ, Memo. on Guidance for Federal Departments & Agencies on Indigenous Knowledge (Nov. 30, 2022), <https://www.whitehouse.gov/wp-content/uploads/2022/12/OSTP-CEQ-IK-Guidance.pdf>.

in contemporary life. This knowledge is part of, and used in, everyday life, and is inextricably intertwined with peoples' identity, cosmology, values, and way of life. Tradition – and TK – does not preclude change, nor does it equal only 'the past'; in fact, it inherently entails change.”<sup>3</sup> For more information on the use and applicability of Traditional Knowledge, please see Kawerak’s position paper: “Addressing misconceptions about Indigenous Knowledges: Fallacies of limitations in scope and applicability.”<sup>4</sup>

Our Tribal entities received a “Dear Tribal Leader” letter on April 11, 2024 from OSTP requesting input on all aspects of a federal marine CDR research plan. We have responded to the suggested prompts, which form the structure of our letter. Our responses are not exhaustive of our feedback and requests to this research and are intended to be taken together as a whole since the topics overlap and inform each other. Our expectations about next steps and ongoing communication are addressed throughout.

### **What are ways that the Federal Government can engage with your Tribe or community when developing and implementing the Marine CDR Implementation Plan?**

First, we wish to make a point of clarification. In recent years, federal agencies, including OSTP, the National Oceanic and Atmospheric Administration (NOAA), and U.S. Department of Defense (DoD), have consistently conflated the language and processes of Tribal Consultation and community engagement. In regard to the marine CDR research under consideration, OSTP should be clear on whether they are conducting formal Tribal Consultation or informal community engagement, and should avoid conflating the interests of Tribal governments with community interests in their communication materials. Tribes, as sovereigns, have interests that must be solicited and weighted differently than general community feedback. While both processes are important for government accountability and transparency, the government-to-government relationship between the United States and federally recognized Tribes requires a separate and formal Consultation process beyond the general input sought by OSTP’s April 11 “Dear Tribal Leader” letter.

We consider the April 11 outreach letter to be community engagement with an emphasis on seeking understanding to do proper Tribal Consultation. We emphasize that feedback to this letter does not constitute formal Tribal Consultation and should not be referred to as such by OSTP or any other federal agencies. However, we take this opportunity for comment seriously

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<sup>3</sup> Kawerak, Inc. Kawerak Knowledge and Subsistence-Related Terms (Internal White Paper, May 2017) <https://kawerak.org/wp-content/uploads/2018/04/Kawerak-Knowledge-and-Subsistence-Related-Terms.pdf>.

<sup>4</sup> Kawerak, Inc., Addressing misconceptions about Indigenous Knowledges: Fallacies of limitations in scope and applicability (2024), <https://kawerak.org/download/position-paper-addressing-misconceptions-about-indigenous-knowledges/?tmstv=1714595769>.

and hope that you give deep consideration to the input contained in this letter on marine CDR planning to prepare for robust and sustained OSTP engagement in Tribal Consultation.

To productively engage with Tribes and Tribal organizations in developing and implementing a marine CDR plan, the federal government must prioritize direct, transparent, iterative, and meaningful interactions and communications. Tribes must be contacted early and often throughout the process. Thorough and understandable information must be provided at all stages for Tribes to decide whether, how, and to what extent to participate in decision-making. Tribes and Tribal entities must be given adequate information to assess the proposed action and be given enough time to properly evaluate and develop a response.

We welcome the presentation of an initial draft plan from the Fast-Track Action Committee (FTAC), incorporating perspectives from this initial request for input, for evaluation under full Tribal Consultation and subsequent co-creation. The draft plan should include summaries of when, how, and which Tribes contributed to its development. The public comment strategy should be co-developed with Tribes and engagement with non-Tribal stakeholders should include Tribal oversight and ongoing participation.

Any future field research related to the implementation of a marine CDR plan must be conducted under the tenets of free, prior, and informed consent, or it should not be conducted at all. Field-based marine CDR research is in its infancy, and consultation and engagements with Tribes and Tribal organizations should go beyond last-minute notifications. Letters of the kind we are here responding to, which are low-detail, demand labor and coordination from Tribes, and take place after millions of federal dollars have already been awarded for the research at hand,<sup>5</sup> demonstrate the low priority Tribal input is afforded. It is neither a privilege nor a pleasure to provide feedback under such circumstances. The scale and sensitivity of this topic necessitates genuine two-way dialogue. A lack of response from Tribes or Tribal entities to this initial solicitation letter, or to future notices for soliciting input, does not signal consent and does not meet the obligations OSTP has for Tribal Consultation under Executive Order 13175.

From the outset, Tribal governments should be contacted individually. Various outreach methods should be used, including hard copy letters, emails, phone calls, and facsimiles. Federal officials should establish a direct point-of-contact with each Tribe and strive to learn as much as possible about their communities and governments. Tribal consortia, including signatories to this letter, should also be contacted for virtual and in-person meetings. Tribal consortia are available to assist the federal government in contacting Tribes and sharing information with Tribes. However, communicating and engaging with Tribal consortia does not replace the federal

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<sup>5</sup> NOAA Ocean Acidification Program, Announcing \$24.3M Investment Advancing Marine Carbon Dioxide Removal Research (Sept. 7, 2023), <https://oceanacidification.noaa.gov/fy23-nopp-mcdr-awards/>.

government's responsibility to communicate and engage with individual Tribal governments directly.

Engagement and dialogue on the development of a marine CDR plan can begin virtually and at the earliest phase of a federal initiative. However, we also expect the federal government to seek engagement via in-person meetings on our Tribal ancestral lands. In-person meetings are indispensable given the limitations of remote or virtual communication styles and rural internet capabilities. Indirect modes of information, such as radio PSAs, social media posts, and local newspaper notices, should also be used. Tribal Elders and Youth should be included in any marine CDR field-based research planning, and OSTP should support opportunities for their participation. Our Elders are our culture bearers, carrying the collective Traditional Knowledge of our ancestors. Our Youth are the future of our culture and will be living with the impacts of these policies the longest and should be at the table to help shape them. We welcome federally-supported, in-region informational events where Tribal members, including Youth and Elders, can gather to learn and share. Heeding the commonly-heard refrain of “nothing about us without us,” in-person engagement can and should happen for planning efforts such as this, long before any active field research or experiments are conceived.

OSTP and the FTAC should also be engaging and consulting with the Intergovernmental Tribal Advisory Council (TAC) of the Northern Bering Sea Climate Resilience Area (NBSCRA) on this marine CDR research plan. All four of our organizations—Kawerak, AVCP, ACSPI, and BSEG—are Tribal partners supporting the TAC. We believe that failing to engage and consult with the TAC on marine CDR would not comply with Executive Order 13754. Executive Order 13754 created the NBSCRA, recognizes the ongoing importance of our stewardship of the Northern Bering Sea, and, to that end, created a unique governing structure in which the federal Bering Task Force under OSTP is required to consult and work with the TAC on decisions that potentially affect our culture, traditional waters, food sovereignty, and ways of life. TAC leadership, in response to our own inquiry, stated that they had not been made aware of the marine CDR communications from OSTP as of May 10, 2024, in spite of regular correspondence with OSTP leadership on other matters. From our perspective, this is a failure of both the word and spirit of the Executive Order 13754.

In addition to the NBSCRA TAC, we hope that OSTP is engaging the Marine Mammal Commission and the eight Alaska Native Organizations with Co-Management agreements concerning the planning of any marine CDR research. Summaries of which entities have been contacted, how they were contacted, and how any feedback received has been integrated into updated planning is an essential part of communicating what OSTP is doing to ensure Consultation is meaningful.

Meaningful engagement and Consultation with Tribes will require federal agencies to invest time and funding into this process, which as we have stated, requires regular, transparent, and respectful two-way communication. Time and funding will be needed to build relationships and travel across rural Alaska to meet with Tribes and Tribal organizations. Input provided by Tribes and Tribal organizations should shape the federal government's decisions. If the proposed action does not adjust according to Tribal input, that is an indicator that no meaningful Consultation or engagement occurred.

The Kawerak-Region Tribal Research Protocols, Guidelines, Expectations & Best Practices may serve as a starting place for OSTP to understand best practices in building relationships with Tribes from the Kawerak region to undertake research ethically and co-develop research planning and implementation with Tribes.<sup>6</sup> Please note that these protocols are specific to the Kawerak-region Tribes, though may be informative for how OSTP may engage with Tribes from other regions.

OSTP is headquartered in Washington DC, thousands of miles from us and from our marine waters. Centralization of government decision-making and resources in locations far away from our Tribes elevates the importance of early, frequent, and thorough engagement throughout any research development and implementation. Since we will bear the consequences of any impacts on the ocean, decisions must be made with, not for, Tribes and Tribal organizations. We thus insist upon the methodology broadly subsumed under the terms co-production, co-creation, and co-development, which enhances equity and builds long-term partnerships for mutual benefit.

**What concerns do you have regarding the regulation of marine CDR field research, including testing at scale, for safety and effectiveness?**

Certain methods of marine CDR carry fundamental risks to ecological balance and embody cultural attitudes that are at odds with Indigenous approaches to adaptation and mitigation. We contest the rationale that geoengineering efforts undertaken by a single nation in the dynamic ocean environment can impact climate change in any meaningful way. Instead, we advocate less risk-laden interventions for ecosystem restoration and carbon sequestration that are already well-known and that are able to enhance social well-being while fulfilling ecosystem functions.

We request that marine CDR is always explored and weighed as part of a wider climate change strategy that also accounts for the role of political, economic, and technological systems in perpetuating environmental injustice and marginalizing frontline communities. Overall, we expect Federal agencies to act from a deep and rigorous diagnosis of the root of climate change

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<sup>6</sup> Kawerak, Inc., Kawerak-Region Tribal Research Protocols, Guidelines, Expectations & Best Practices, <https://kawerak.org/download/kawerak-region-tribal-research-protocols-guidelines-expectations-best-practices/?tmstv=1712338136>.

and its associated challenges. Recognizing the intersections of uneven economic development, extractivism, land dispossession, and climate change is a vital first step in developing appropriate interventions and responses. Ensuring that Tribal voices are heard and respected throughout the development of the marine CDR research plan and regulation will enrich any and all efforts by the government to combat climate change.

Western Alaska Tribes are already facing numerous major impacts from the effects of climate change as a result of industrialism and extractivism at lower latitudes, and we have strong concerns regarding the regulation of marine CDR field research, its potential impacts on the safety of our communities and subsistence ways of life, as well as its actual effectiveness for climate change mitigation and adaptation. As such, there is Tribal interest in any potential research and regulation on marine CDR no matter the scale that is being considered for field testing.

The marine species that our communities depend on already face a host of stressors, threats, and pressures including exacerbated by the impacts of an Arctic warming four times faster than the global average. Harmful algal blooms are growing in size, frequency, and toxicity as ocean temperatures rise. Widespread, multispecies seabird die offs have occurred in the Bering Sea since 2015. Reports of highly pathogenic avian influenza are increasing globally and infecting and killing a growing number of birds as well as terrestrial and marine mammals, increasing the risk of infection for humans and our subsistence foods. Marine debris is increasing on our shorelines and vessel traffic is increasing in our waters, with the associated risk of large and small-scale pollution events. The globe needs a rapid transition away from fossil fuel dependencies and investments in decarbonization technology. However, these experimental technologies cannot come at the cost of vulnerable ecosystems already weakened by climate-related stressors without careful consideration of their possible impacts from marine CDR or ocean alkalinity enhancement in fragile arctic and sub-arctic marine ecosystems. Considering these outsized impacts, OSTP and FTAC should learn deeply from the input received from Tribes that live in relationship with the Bering Sea.

Regarding marine CDR-specific hazards, Tribes and Indigenous Peoples have heightened concerns around marine contaminants, as their impacts are compounded by bioaccumulation and biomagnification in marine species that our communities rely on for a substantial portion of their diet. Such concerns have already been voiced with regards to methylmercury, arsenic, microplastics, and industrial waste products, but other supposedly benign inputs (such as iron), especially in large quantities, still warrant significant concern. The secondary impacts of marine CDR experimentation that may reduce the nutritional quality of subsistence foods or cause them to be toxic to human consumption are especially concerning due to our Tribes and communities' limitations in accessing equitable healthcare. Ocean currents concentrate and deposit contaminants at the poles, so wherever marine CDR activities take place, the remnants will end



up where we live, in the food we eat, and in our bodies. Because of this, Tribes and Tribal organizations ought to be full partners in planning any marine CDR research, including the ability to refuse to be test subjects.

Additionally, Western Alaska's ocean and river systems are experiencing significant salmon collapses across multiple species, threatening food security, cultural practices, as well as economic stability. Any activity that poses risks to salmon or their habitats necessitates careful and precautionary assessment in conjunction with Tribal input and oversight. Tribes are the best judges to determine which activities pose risks for Alaska salmon. Further, Tribes must be procedurally empowered to weigh in with diverse types of knowledge on the complex costs and benefits of climate change mitigation. As sketched out above, any marine CDR activities would take place in a context of compounding and cascading environmental problems, such as ecosystem collapse or species extirpation. Engaging Tribes on specific methods and their known and unknown impacts (such as trophic cascades resulting from ocean alkalinity enhancement impacts on bivalves) is essential to a responsible and future-thinking strategy.

We would also like to draw attention to the fact that presently, there is no clear regulation or permitting of marine CDR, either in experimental modes or as an applied technique. As a signatory to the London Convention on the Prevention of Pollution by Dumping of Wastes and Other Matter, the United States has obligations to develop domestic and international standards for evaluating and permitting marine geoengineering activities prior to their implementation. We insist that Tribal representation, particularly from coastal communities, be included in any and all future interactions between US International Maritime Organization delegations and the Scientific Groups of London Convention and Protocol and have the opportunity to contribute to Annex 4 recommendations and other deliberations regarding proposed activities. As Tribes contribute to the FTAC's efforts, it is essential for OSTP to collaborate with Tribes to co-develop and review any potential permits or procedures created for marine CDR or other geoengineering activities.

In addition, NEPA process and environmental impact assessments, while essential and valuable tools, nonetheless perpetuate problematic cost-benefit logics and often serve as justification for, rather than precaution against, various projects moving forward. Should marine CDR activities fall under these familiar legal processes, Tribal Consultation remains indispensable, and all potentially-affected Tribes should be included transparently and comprehensively well ahead of any planned field activities. In the course of environmental impact assessments, we expect the federal government to ensure robust and sustained field observations (prior, during, and post-research), regardless of changes in presidential leadership or specifics of research being done as all work in our regions is of interest to Tribes. The federal government should ensure that all impact assessments include both environmental and social science research elements. Tribes should also receive funding to conduct independent and collaborative field observations prior,

during, and post-assessment to validate the findings of non-Tribal researchers. Tribes should have the time to review this information and weigh in on any decisions, including whether, how, when, and where, any field research may be conducted.

We find it alarming that the federal government is already allocating funds to marine CDR field studies and moving forward with various elements of planning and regulation without Tribal Consultation. OSTP's blog post on October 06, 2023, "Marine Carbon Dioxide Removal: Potential Ways to Harness the Ocean to Mitigate Climate Change," indicates a variety of efforts concluded at least six-months prior to the "Dear Tribal Leader" outreach letter. While we acknowledge that many efforts are probably low-impact or involve elements that will dissipate quickly in the marine environment, we are deeply concerned that others constitute much more involved geoengineering efforts. Indeed, the name of the FTAC, despite the disclaimer that it "does not have authority to permit or fast-track any specific project" indicates that care and caution are secondary to expediency. Our concerns expressed above regarding the lack of OSTP's clear understanding of the difference between community engagement and Tribal Consultation are echoed here; in the absence of Tribal representation on regulatory and planning committees, it appears that OSTP may be underprepared to engage interested Tribes about marine CDR planning.

Lastly, we emphasize that any research or expectations on the outcomes of marine CDR research should compliment and not replace efforts to reduce greenhouse gas emissions or support community adaptation measures as this nationally reinforces the holistic approach needed to address climate change effectively and seriously. If the federal government expects marine CDR to play a significant role in the nation's climate change strategy, it must be accompanied by decarbonization measures, including noncompetitive financial and technical support for Tribal communities in rural Alaska to transition to renewable energy resources. We are firmly of the mind that climate change is not a problem we can geoengineer our way out of.

### **What types of information about marine CDR should the Federal government make available?**

As we have stated previously, ensuring timeliness and transparency in all information related to federal planning for marine CDR initiatives is paramount for fostering trust and meaningful engagement. The federal government should provide clear and comprehensive information on all aspects of proposed marine CDR methods, current research, and, of course, planned research activities.

For any proposed field research, information that is shared should include detailed descriptions of the objectives, proposed methods, location, duration in which the method would be deployed, and plans for mitigation of negative impacts and any potential subsequent cleanup efforts.

Comparative analysis of any proposed research into other interventions being explored or proposed by the government to accomplish similar aims in marine CDR and carbon sequestration should be provided to Tribes and other community members. Each method under consideration should include the potential environmental and human impacts of conducting the experiment in the proposed location as well as alternate locations and outcomes of not applying the method at all (“no action alternative”).

Digital access to federal scientific data and publications on the techniques and impacts of marine CDR methods to all land and marine ecosystems should be supported in a manner that is easily understood and accessible to Alaska Tribal communities. To facilitate the understanding of all information provided to community members and non-technical experts, the federal government must offer sufficient staff and technical support experts to convey complex information effectively. Tribes should also be included in analyzing the data outcomes from co-produced research and disseminating those conclusions. In addition to conclusions determined through Western scientific methodologies, published materials should include observations and Traditional Knowledge provided by Tribes regarding the effects of marine CDR activities on their waters and lands.

Finally, we insist on transparency regarding any and all public-private partnerships (PPP) around marine and other CDR research and implementation. We express our deep concern with what we perceive to be another opportunity for publicly-funded research to support private, commercial enterprise in emerging carbon markets, blue economic development projects, and ecosystem functions. The trust demanded by marine CDR research thus requires clear identification of private, institutional, or federal agencies responsible for conducting or funding any proposed research, anticipated permits that are to be obtained, and clear points of contact for inquiries on the information. If PPPs are being pursued, Tribes should be given the opportunity to understand the private partner’s interests, objectives, prior commitments, and expertise. Any private partners should be held to the same standard of transparent information sharing, co-management with Tribes, Executive Orders, and Federal guidance on Tribal Consultation and engagement.

**In what ways should the Federal government engage marine CDR stakeholders and the public, including Indigenous communities that marine CDR could affect?**

Our response to this question builds off our expectations shared under question number one. OSTP must engage in robust Tribal Consultation, and OSTP can and should co-develop any marine CDR plan with potentially affected federally recognized Tribal governments and Tribal organizations. This is separate from and in addition to sharing information transparently and engaging Indigenous Peoples and other community members in accordance with operating as a federal entity serving the needs and interests of all citizens.

First, OSTP could have committed to fully co-developing the research plan with interested Tribes, but the steps represented in the April 11 “Dear Tribal Leader” letter are instead the bare minimum that must be done to fulfill federal obligations to Tribes. The “Dear Tribal Leader” letter states: “A formal Tribal Consultation event with Tribal Leaders may occur at a later date, once a draft research plan that includes Tribal and Indigenous community input has been developed.” This conditional statement must be replaced with an absolute. OSTP must include Tribal input in the development of an initial research plan; OSTP must engage in Tribal Consultation with federally recognized Tribes across Alaska and the rest of the United States on a draft marine CDR research and implementation plan; and OSTP must ensure that Tribal feedback is meaningfully integrated into the development of the final marine CDR plan.

Second, Tribes are not “stakeholders,” as referred to in the April 11 “Dear Tribal Leader” letter. Rather, Tribes are sovereigns with a government-to-government relationship with the United States government, and as such, Tribal Consultation is a separate and distinct process from stakeholder engagement. Indigenous community members, Indigenous organizations, and other stakeholders should also be part of OSTP’s broader communication plan, but engagement with any of those entities does not release OSTP from their obligations to seek and integrate Tribal input into future management plans.

Third, the draft research plan must avoid consolidating Tribal input in a way that diminishes the unique priorities, concerns, and contributions of individual Tribes and our unique communities. There are 574 federally recognized Tribes in the United States. 229 of those Tribes are in Alaska. The draft research plan must include input from Tribes across Alaska due to the state’s vast and varied geography and the many cultures that have developed across its lands and waters. Tribes outside of Alaska cannot represent Alaska Native Tribal concerns, priorities, or interests. Tribes are not homogenous; each has a distinct culture, history, knowledge system, relationship with their lands and waters, and right to self-determination. Those distinctions, and the input that arises from them, must be fully reflected in the draft plan.

**What effects might a Marine CDR Implementation Plan have on you or your Tribe or community?**

As this question concerns the effects of an Implementation Plan, implying the decision has already been made that there will be additional or ongoing federally funded marine CDR field experiments and other actions, our response builds off our concerns and recommendations provided under question number two relating to regulation and oversight. We hope that seeking Tribal input is not an afterthought. We hope that you who are reading this are asking for insight on how to better engage Alaska Native Tribes so our experience and expertise can contribute to a robust US Federal Implementation Plan on marine CDR.

We have expressed concerns related to the process OSTP has followed thus far in which it has conflated community input and Tribal Consultation, and underscore here as well that there is always a negative impact on Tribes when federal agencies neglect appropriate relationship-building or forge ahead without appropriately engaging Tribes. Any implementation plan related to marine CDR that the federal government develops should be done with, not for, not to, Tribes, especially those who will be most impacted by marine CDR experiments and activities. OSTP has an opportunity to rectify the process it has undertaken so far in regard to marine CDR and work with interested Tribes prior to any further federal action. We urge you to take the time to develop both research and any future implementation plans with Tribes.

Above, we have expressed some of our initial concerns regarding the potential adverse effects of marine CDR research and activities on ocean ecosystems and the cascading impacts on human health, wildlife health, cultural continuity, food sovereignty, economic welfare, and self-determination. As the federal government has yet to indicate which, if any, marine CDR methods they may intend to support in the development of a plan, all comments below are necessarily general. OSTP and other federal agencies have the obligation to seek specific input on specific methodologies as each will have their own effects that Tribes must be able to weigh.

The potential rate of movement from a research plan to an Implementation Plan, as suggested in the “Fast-Track” component of FTAC, raises critical concerns for Tribes and the federal government, demanding careful consideration of potential actions, regulation, and proactive measures to safeguard our lands and waters. A federal marine CDR Implementation Plan that has already bypassed discussion of a moratorium on geoengineering heralds many potential adverse effects for Tribes and communities in our region. Therefore, any marine CDR Implementation Plan must address risks on our communities’ overall health and well-being in addition to immediate impacts, which must also be considered in any analysis of whether and how to move forward with marine CDR research.

**By way of conclusion, we wish to leave you with these thoughts.**

Marine CDR represents a single, narrow area of applied novel science whose viability and effectiveness for mitigating climate change remain entirely speculative. While there is no doubt that securing a more stable climate and removing CO<sub>2</sub> from the atmosphere is important, such mitigation efforts often appear as false solutions to communities whose exposure to climate change is only the most recent of many harms inflicted by Federal and State government agencies and industry. Tribal Peoples and homelands are already disproportionately impacted by climate change. It is essential to prevent further disproportionate impacts on Tribal, Indigenous, low-income, and marginalized communities from any marine CDR efforts. Individual Tribes are best positioned to determine whether and how climate mitigation strategies, including marine CDR, will impact them and must be directly asked. OSTP can and should provide clear,

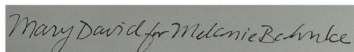
understandable information on what they are considering to all potentially interested Tribes. OSTP can and should engage in formal Tribal Consultation on marine CDR research planning as well as any future implementation, with an emphasis on Tribes most impacted by these federal actions. OSTP can and should meaningfully take each Tribe's input into account when formulating plans that will go to public comment, clearly communicating how the Tribal input helped shape the draft plan(s). OSTP can and should continue to build relationships of trust through transparent communication with Tribes.

Though climate change is a global problem impacting diverse populations, its solutions must not repeat or reinforce extractive and ecologically devastating patterns of the last century that have disproportionately harmed Indigenous Peoples. Money being diverted to various climate change research efforts, though miniscule from a federal government standpoint, could make an immense difference in a communities' ability to prepare for and adapt to a warmer future. We thus urge OSTP to think deeply about what we have written above, and to think more broadly about how to embrace proven solutions to known problems in favor of speculative solutions that come with their own unknown problems. OSTP should equally consider *not* using marine CDR methodologies in light of how the investment of time and resources there represents an opportunity cost to more well settled as safe adaptation and mitigation strategies.

We appreciate the opportunity to provide OSTP with our concerns, priorities, and recommendations regarding marine CDR research. Thank you for considering our input, and we look forward to robust engagement and Consultation on this topic. If you have questions or concerns pertaining to this letter, please contact:

- Kawerak Inc. Marine Advocate Anna Rose MacArthur at [armacarthur@kawerak.org](mailto:armacarthur@kawerak.org)
- AVCP Natural Resource Manager Jennifer Hooper at [JHooper@avcp.org](mailto:JHooper@avcp.org)
- Aleut Community of St. Paul Island Fisheries Management Liaison Connie Melovidov at [cmelovidov@aleut.com](mailto:cmelovidov@aleut.com)
- Bering Sea Elders Group Executive Director Jaylene Wheeler [director@beringseaelders.org](mailto:director@beringseaelders.org)

Sincerely,



Melanie Bahnke  
President, Kawerak, Inc.

Vivian Korthuis



Chief Executive Officer, Association of Village Council Presidents



John Melovidov

President, Aleut Community of St. Paul Island



Jaylene Wheeler

Executive Director, Bering Sea Elders Group