

North Pacific Fishery Management Council

Dan Hull, Chairman
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Mr. William Douros
West Coast Regional Director
NOAA Office of National Marine Sanctuaries
99 Pacific Street, Suite 100F
Monterey, CA 93940

Dear Mr. Douros:

On behalf of the North Pacific Fishery Management Council (Council), I want to express our appreciation for the time and effort you took to attend our February meeting in Seattle, and for the detailed and informative presentation. Your presentation gave us a much clearer understanding of the process involved in consideration of a nominated site for potential designation as a national marine sanctuary. The Council has long been interested in this process, but our interest has been heightened by the recent revisions to the nomination process, and particularly in light of the recent nomination of a very large area of the Bering Sea and Aleutian Islands over which the Council has management authority in concert with the National Marine Fisheries Service (NMFS). The specific proposed nomination, for the 'Aleutian Islands National Marine Sanctuary' by Public Employees for Environmental Responsibility, includes (or implies) a number of significant actions related to management of habitat, marine mammals, seabirds, and fisheries which would fall under Council authorities.

While we understand that this initial proposal has been determined not to be complete at this time, we also understand that the nomination may be resubmitted with additional information, and that following that resubmittal NOAA may determine that the nomination meets the significance criteria and the area could then be accepted to the standing inventory, at which point NOAA would engage in a multi-year process to determine whether it is designated as a sanctuary. We also understand that once a nomination is placed on the national standing inventory, the process calls for consultation with the appropriate regional fishery management council prior to any actual designation by NOAA as a sanctuary.

However, given the magnitude of the proposed Aleutian Island National Marine Sanctuary and the potentially significant implications to our management mission in this area, the Council is requesting that we be consulted *prior* to any decision by NOAA regarding the adequacy of the nomination and its subsequent placement on the national standing inventory. We would further request that NOAA consult with the Council regarding any sanctuary nomination in the North Pacific region, prior to a determination of adequacy and placement on the national standing inventory. We believe this to be a critical step in the overall nomination process, and therefore is a step for which Council consultation and broad public engagement, which is part of the Council process, would be highly appropriate.

Again, thank you for discussing these issues with the Council at our February meeting. We look forward to further collaboration with the agency as you consider sanctuary nominations through the revised nomination process. We also look forward to your positive response to our request for consultation prior to a nomination being added to the national standing inventory for potential, subsequent designation.

Sincerely,



Chris Oliver
Executive Director

CC: Daniel Basta, Director, NOAA Office of National Marine Sanctuaries
Eileen Sobeck, Assistant Administrator, NOAA Fisheries
James Balsiger, Alaska Regional Administrator, NOAA Fisheries