

# North Pacific Fishery Management Council

Dan Hull, Chairman  
Chris Oliver, Executive Director  
Telephone (907) 271-2809  
www.npfmc.org



605 W. 4th Avenue, Suite 306  
Anchorage, AK 99501-2252  
Fax (907) 271-2817

October 14, 2016

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 thank you for the opportunity to comment on the St. George Unangan Heritage National Marine Sanctuary nomination which was recently submitted to your office. It is the Council's understanding that you are still in step one of the process, which is to determine if the nomination package is complete. In our email correspondence regarding this issue, you indicated that any comments from the Council at this stage should be directed at whether the nomination meets the 11 criteria NOAA has established for sanctuary nominations (four national significance criteria and 7 management considerations).

The degree to which any nomination meets these 11 criteria can be a rather subjective determination; for example, upon initial review of the nomination, it appears to address all 11 criteria *to some degree*. We also appreciate that the nomination recognizes the existing management authorities (such as the Council and NMFS), and articulates an intent to work with these authorities to craft management measures should a sanctuary designation ultimately occur. The final rule for the nomination process indicates that nominations should provide information on all seven management considerations with special emphasis on consideration #7 (community-based support from a broad range of interests, particularly local groups). At this time, we wish to limit our specific comments to that criteria.

The final rule further requires that if a nomination includes waters in proximity to tribal lands, the nominator must consult with the respective tribal government on the nomination prior to NOAA continuing its review of the nomination. Based upon our initial review of the nomination, we are unable to determine whether the threshold for management consideration #7 has been met. Obviously the City of St. George, and a number of local residents, support the nomination, and there are letters of support from other tribal and environmental organizations; however, most of these letters of support are from entities geographically located far from the island of St. George. All of the attached tribal support letters appear to come from areas well outside the region (400 – 800+ miles from St. George).

We note that four of the five primary community entities representing St. George have not provided letters of support. The five primary entities include not only the City of St. George, but also the St. George Traditional Council (the Tribe), the St. George Tanaq Corporation, the Aleut Corporation, and the Aleutian

Pribilof Islands Community Development Association. The Aleutian Pribilof Island Association could also be considered a related community-based group in the region. We do not know whether and to what extent these entities have been consulted in this nomination process. Therefore, we urge you to carefully evaluate the nomination with regard to this management criteria, prior to determining the ‘completeness’ of the nomination package (or prior to determining its suitability to be placed on the standing inventory of areas to be considered for designation).

We understand that this will be a major factor in your determination, and we wish to be kept apprised of the outcomes of your determination. We also understand that nomination to the standing list of potential sanctuaries is a first step, and that actual *designation* as a marine sanctuary is an entirely separate process, which includes a specific consultation process with the Council. Again, we appreciate the opportunity to comment on this step in the nomination process.

Sincerely,

A handwritten signature in blue ink that reads "Chris Oliver". The signature is written in a cursive, flowing style.

Chris Oliver  
Executive Director

CC: Dr. James Balsiger  
Mr. Samuel Rauch