

December 1, 2016

Dear Mr. Douros,

As NOAA continues its review of the St. George Unangan Heritage National Marine Sanctuary nomination I would like to express gratitude on behalf of the people of St. George. We know that the review process is detailed and we are extremely grateful for the care and consideration that our nomination is being given. The development of our nomination has been a long time in the making and followed from much information gathering and discussion about the National Marine Sanctuary program and its potential benefits to the St. George community and marine environment. You will recall that in 2011, I and the President of the St. George Traditional Council wrote to NOAA Administrator Jane Lubchenco urging protection of St. George's marine environment. In 2014, young students from St. George and St. Paul traveled to Washington, D.C. with representatives of the St. George Traditional Council to attend the annual Capitol Hill Oceans Week conference. The students presented a letter to John Podesta, then Counselor to President Obama, expressing St. George's strong interest in creating a National Marine Sanctuary and promising that St. George would submit a nomination. Around that time, we also had the good fortune of receiving a visit from you, at our request, during which you did a beautiful job of helping the community understand the National Marine Sanctuary program.

Over the years, St. George has had the good fortune to receive support from a wide range of marine scientists and other researchers. These dedicated experts helped us to understand the worrisome status of the marine environment and the need to protect our declining marine wildlife populations. More recently, I had the honor of visiting the Monterey Bay National Marine Sanctuary and meeting with local municipal and Sanctuary officials, including the Mayor of Santa Cruz, each of whom explained the good that their Sanctuary had done for local communities and the marine environment, while enabling commercial activity to continue and flourish. All of these events over the course of time, along with an ongoing discussion within the community, combined to create a community consensus in favor of taking action and pursuing a Sanctuary nomination. Prior to developing our nomination, we discussed the Sanctuary program in informational briefings for the City Council, the St. George Traditional Council as well as in a town meeting. In July, the City Council voted unanimously to take action, a decision joined by nearly all voting age community members. Following submission of the nomination, I and the other City Council members involved in the development of the nomination were reelected in yet another clear signal of community support for the Sanctuary.

As a community we understood that we could no longer wait, could no longer be a silent witness to the losses being experienced by our marine environment and our community. Over the many years of our existence we have too often been subject to decisions made by outside forces and interests. We have too often been made to feel unimportant and powerless, forgotten as the world literally develops around us. This past year, through our decision to pursue the creation of the St. George Unangan Heritage National Marine Sanctuary, the people

of St. George have stood up and made their voices heard in the interest of saving the community. We have owed it to ourselves and to the next generations who will follow in our path. We have not done things perfectly and we remain humble in the face of the challenges that we face, but our right and our decision to be heard is historic and cannot be denied.

We are aware of and are very grateful for the many expressions of support that community members, tribes, municipalities, researchers and others have expressed for our nomination. We are also aware that some have expressed reservations. I would like to address some of these concerns from the perspective of the St. George community.

Although the National Marine Sanctuary program is not new, it remains largely unknown to all but a handful of Alaskans. Since St. George submitted its nomination, many across the state have begun to talk about the Sanctuary program. This is good and will lead to greater understanding. For our part, we are excited about the fact that the existence of the St. George Unangan Heritage National Marine Sanctuary will serve as a beacon for creating awareness about sanctuaries and the ability they offer to balance sustainable development with marine conservation and climate resilience. In the near term, however, it has also become clear that some of the reservations expressed about our nomination are based on misinformation and misunderstandings about National Marine Sanctuaries and the implications of our nomination for St. George and region. Following is a discussion of some of the key misconceptions that I have seen and heard expressed.

### **National Marine Sanctuaries are not Marine National Monuments**

National Marine Sanctuaries are commonly confused with Marine National Monuments, even though the two programs have very different processes. Those who harbor this misconception do not appear to be aware that Sanctuaries are not created by Executive Orders of the President, as Monuments are under the Antiquities Act, or that a Sanctuary nomination cannot be transformed into a Monument and quickly established. Instead, proposed Sanctuaries are nominated by communities and are subject to extensive review by NOAA. The multi-year designation process (typically 3-5 years) follows completion of the nomination process and is separate and distinct by law, entailing broad, transparent consultations with government, the scientific community, industry and a variety of other stakeholders. There should be no confusion that, in putting forth its Sanctuary nomination, St. George is attempting to bypass the legitimate interests of all other stakeholders. Indeed, it is the Sanctuary system's deliberative process, in which St. George and all other partners will have a seat at the table, that attracted St. George to the National Marine Sanctuary program.

### **A Sanctuary nomination that is local in scope**

St. George has proposed a limited Sanctuary zone that would extend in a 30-mile radius around the island, except in the direction of St. Paul, where it would extend 20 miles. The proposed zone is science based, encompassing the especially biologically rich retention zone and habitat that surrounds the island. The unfounded suggestion has been made that the Sanctuary zone is likely to be expanded and to create challenges with respect to fisheries management. The fisheries management regime, however, would not be at all affected: the North Pacific Fisheries

Management Council and the State of Alaska would retain authority over fisheries management. It should also be recognized that St. George's nomination was developed locally, is local in its geographic scope, while providing significant ecological benefits to the region, and expresses the legitimate interest of the Unangan people of St. George to protect our local marine environment.

### **Restrictions on uses of the ocean**

A number of people have expressed concern that the creation of a Sanctuary would necessarily result in new regulations and/or limitations on certain uses of the waters, such as fishing. This is not true. The eventual designation of a Sanctuary, following stakeholder consultations, would lead to creation of a comprehensive management plan that would take into account the full range of threats to St. George's marine environment as well as existing regulations. Cooperative and adaptive strategies for managing, e.g., marine debris, pollution, international shipping, invasive species and other threats that are emerging in the Arctic could build on existing federal and state regulations and programs, as they have done in other Sanctuary areas. Should any additional regulations be needed, they would be developed openly and with the opportunity for inputs by any interested stakeholder. Far from being divisive and redundant, as some have suggested, comprehensive management would stimulate education and awareness and might even create a basis for bringing communities in the region together to address issues of common concern (e.g., pollution, ocean acidification, debris).

We have also noted concerns about potential impacts on fishing in the Bering Sea region. Fishing, however, is crucially important to our community, commercially and for subsistence. We are committed to working with our partners in government and the private sector to fulfill the promise that fishing and fish processing may someday compensate for the economic losses incurred in the aftermath of the Fur Seal Act Amendments of 1983 and be a driver for economic health and prosperity in our community. We deliberately chose to pursue a Sanctuary, and not a Monument, because fishing has never been banned in any of the nation's National Marine Sanctuaries and has flourished in all of them. Indeed, as stated, any and all regulation of fisheries and quotas would continue to be under the authority of the North Pacific Fishery Management Council and the State of Alaska.

### **The St. George Harbor Project**

Some have expressed concern that our nomination threatens to impede progress toward renovation and expansion of the St. George Harbor. As St. George's representative to the Harbor renovation project team, as someone who understands the Harbor project intimately and has invested countless hours to realize this essential community goal, I was surprised to learn that anyone might suspect we would ever take any steps that might jeopardize the Harbor project. Those who have read the nomination will know that it specifically anticipated the Harbor renovation by including a buffer zone around the Harbor for its expansion pursuant to the project. The inclusion of the buffer zone is entirely consistent with National Marine Sanctuary policy, which recognizes the economic development needs of Sanctuary communities and permits harbor and other infrastructure projects even when the Sanctuary does not already include a buffer zone. Moreover, the multi-year sanctuary designation process, during which

the Harbor renovation will hopefully have been completed, would allow ample opportunity for any further adjustments needed to the buffer zone to ensure consistency with the Harbor design and plan. Contrary to concerns that the Sanctuary nomination might impede the Harbor's renovation, the Sanctuary nomination in fact complements and is entirely consistent with the Harbor project, and should help to promote its advancement. The presence of a National Marine Sanctuary office and related activities on St. George, including increased research and recreational use of the island, would only enhance St. George's national profile and encourage greater support for funding the Harbor project.

### **Local economic development**

Some have raised concern that the Sanctuary nomination threatens St. George's economic development. Those of us who live on St. George, however, see the opportunities created by the Sanctuary very differently. The creation of the Sanctuary will be a crucial building block to reviving our economy, which has never recovered since the Fur Seal Act Amendments of 1983 stopped the fur seal trade and local crab processing ended not long thereafter. Despite assurances that our economy would benefit from various community and economic development initiatives over the years, unemployment and poverty levels on St. George remain shockingly high, at great expense to the welfare and spirit of our people. We who live on St. George understand that our economy is our survival, and that without a healthy marine environment around us there can be no economy. It is imperative, therefore, that the St. George community take control of its own destiny by doing everything in our power to protect the resources we rely on. The Sanctuary will not only conserve our resources into the future through planning and adaptive management, it will also yield significant direct and indirect economic benefits to St. George residents. An analysis of the proposed Sanctuary's economic benefits performed by Earth Economics estimates that the combination of operating funding for a sanctuary office, fundraising and grant income for the purpose of sanctuary research, and increased recreational expenditures by tourists could create annual economic contributions to our community of \$395,000 to \$1,440,000. The Sanctuary would also increase subsistence harvest values. On a per capita basis, the Sanctuary's annual economic contributions could rival some of the most significant development benefits ever experienced by our community members.

In addition to the foregoing, I would like to note that the people of St. George have always had a unique relationship with the federal government. Every resident knows and has often worked side by side with representatives of NOAA, U.S. Fish and Wildlife Service and others who come to St. George to do research and experience the wonder of our natural world. The Fur Seal Act Amendments of 1983 further enshrined this relationship and explicitly emphasized the importance of protecting Pribilof Island fur seals and other wildlife. Section 1161 of the Act states that "The Secretary [of Commerce] shall administer the fur seal rookeries and other Federal real and personal property on the Pribilof Islands...and, in consultation with the Secretary of the Interior, shall ensure that activities on such property are consistent with the purposes of conserving, managing, and protecting the North Pacific fur seals and other wildlife and for other purposes consistent with that primary purpose." Similarly, Section 1155 of the Act states, "The Secretary shall prescribe such regulations with respect the taking of fur seals on

the Pribilof Islands and on lands subject to the jurisdiction of the United States as he deems necessary and appropriate for the conservation, management, and protection of the fur seal population....” The Secretary’s responsibility was again echoed in a 1984 Memorandum of Understanding signed by NOAA, the Governor of Alaska and the Mayors of St. Paul and St. George. Altogether, these provisions make clear Congress’s intent that measures should be taken to conserve, manage and protect St. George’s Northern Pacific fur seals and other wildlife. At a time when St. George’s fur seal population and other wildlife are under a grave threat, the creation of a National Marine Sanctuary around St. George would be perfectly in line with the letter and the spirit of the Act.

Let me close where I started, by expressing, on behalf of my community, our deepest thanks to you and the entire NOAA staff for all that you do for our great country and for your thoughtful consideration of the St. George Unangan Heritage National Marine Sanctuary nomination.

With best regards,

Patrick Pletnikoff  
Mayor