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As St. George loomed ahead the number of seabirds increased. Murres skittered and bounced from wave to wave until they were airborne, or, failing this, dived beneath our advancing bow. First there were dozens, then hundreds, then thousands. Puffins flew by, singly or in small groups; crested auklets and choochkies [least auklets] buzzed about in compact little flocks. With our binoculars we swept the water in the direction of Staraya Artile and were staggered by the traffic pouring out to sea from the big cliff.

From Peterson and Fisher's Wild America (1955, p. 409)

Dear Mr. Douros:

On behalf of Audubon's Alaska and Pacific Flyway offices, we are pleased to offer this letter of support for the concept of a St. George Island National Marine Sanctuary as resolved on 1 July 2016 by the City Council of St. George. This proposal represents an important step by the residents of St. George to define for themselves a path forward to sustain their way of life and the environment and natural resources they depend on in the face of a changing climate and other challenges in the Bering Sea around them. Audubon is gratified to be part of this effort, as we have worked for four decades to protect and sustain the natural resources and traditional cultures of the Bering Sea ecoregion. These efforts started in the late 1970s when Dave Cline, then Audubon's Alaska-Hawaii Regional Vice President, worked directly with the Pletnikoff family and other St. George residents to protect cliff-side nesting habitats for millions of Pribilof Island seabirds as part of the Alaska Maritime National Wildlife Refuge.

Evaluating and ultimately designating a marine sanctuary rests in part on the degree to which the proposed sanctuary meets and addresses several criteria and considerations. The following excerpt on the Pribilof Islands (specifically including St. George) from The Important Bird Areas of the Bering Sea Ecoregion¹ (pp. 28-29) addresses many of those factors, including the extraordinary value to birds and other wildlife, as well as threats and conservation needs and opportunities:

Habitat: Island landscapes are dominated by rolling upland tundra hills and ridges with volcanic gravel cinder cones and lava fields. Formidable seacliffs on St. Paul's southwest coast and most of St. George, with some of St. George's more than 1,000 feet (305 m) high, are especially attractive to nesting seabirds. The extensive seacliffs in close proximity to rich food sources along the continental shelf break, particularly the Pribilof Canyon, account for St. George's attractiveness to spectacularly abundant seabird populations. Other prominent habitats include nearshore intertidal waters, intertidal sand flats and volcanic sand beaches, interior scree slopes and boulder fields, and a few coastal lakes. Moist volcanic soils support tundra-heath communities of tall grasses, dwarf shrubs, an unusually rich diversity of lichens, and scattered small patch wetlands.

Birdlife: The estimated overall population of two million seabirds is dominated by species of the open ocean: kittiwakes, murres, northern fulmars, and auklets. Biologists estimate that 80 percent of the world's population of red-legged kittiwakes nest in the Pribilof's. Other globally significant congregations of seabirds include black-legged kittiwakes, thick-billed murres, common murres, red-faced cormorants, northern fulmars, least auklets, parakeet auklets and horned puffins. Since St. Paul Island is much farther from the food-rich shelf-edge than is St. George and has many fewer cliffs, it supports fewer nesting seabirds. Walrus Island reportedly supported the largest murre colony in Alaska until predatory foxes gained access across the sea ice and decimated the vulnerable colony. Salt Lagoon near St. Paul village attracts post-breeding shorebirds, including ruddy turnstones and rock sandpipers. The Pribilof race of rock sandpiper is an endemic subspecies breeding only on several Bering Sea islands. It nests on upland tundra areas of the island before migrating east not south, as with other shorebirds to the tideflats of upper Cook Inlet, where it winters feeding on fingernail-size clams at low tide. Year round residents of the islands include gray-crowned rosy finches and winter wrens, with the latter reaching its northernmost breeding site in North America on St. George. Significant numbers of the threatened Alaska population of Steller's eiders winter on island coastal waters in company with king eiders, common goldeneyes, buffleheads, harlequin ducks, long-tailed ducks, black scoters, glaucous, glaucous-winged and slaty-backed gulls, and black guillemots. The islands are noted for unusual sightings of vagrant species of birds from both Asia and North America.

Other notable wildlife: Several hundred endangered Steller sea lions occupy haulouts on the islands rocky shores. The species most northern breeding rookery in the Bering Sea is on St. George. An estimated 75 percent of the world's depleted northern fur seal population inhabits breeding rookeries on the Pribilof Islands. Harbor seals occur in very low numbers, having suffered an 80 percent decline throughout the region. Once abundant Pacific walrus and sea otters are now rarely sighted. The only terrestrial mammals are endemic populations of Arctic fox, black-footed brown lemming, and introduced herds of domestic reindeer.

¹ Audubon Alaska, BirdLife International (Asia Council) and Russian Bird Conservation Union. 2004. The Important Bird Areas of the Bering Sea Ecoregion. National Audubon Society, Anchorage, Alaska. 40 pp.

Threats: The accidental introduction of rats from shipwrecks or vessels docking at island small boat harbors could have devastating consequences for island birdlife. There is also serious risk of fuel spills and other contaminants as local commercial fishing, marine shipping and cruise-ship vessel traffic increases. Disruption of marine food webs by industrial-scale commercial fishing, and disturbance from humans including low-flying aircraft are yet other major concerns. Domestic reindeer may be depressing numbers of ground-nesting birds.

Conservation needs: Collaborative rat-exclusion programs involving the USFWS and local communities have forestalled several rat invasions and must continue! Yearly monitoring and population research on birds of the Pribilof should continue. Offshore surveys of feeding seabirds are also needed. Establishment of an "International Bering Sea Ecosystem Research Station," as proposed by local people and marine conservationists, on the islands is overdue.

Below are additional Audubon perspectives on several of the key criteria and considerations:

The area supports present and potential economic uses.

Economic activity on St. George is based on natural and cultural resources², and both present (including subsistence) and potential economic uses will benefit from improved conservation and management of those resources. Beyond resource protection, designation of a St. George Marine Sanctuary would also increase economic activity through administration of the sanctuary itself as well as provide a foundation for increased research and management activities and tourism, such as wildlife viewing.

The public benefits of the area, such as aesthetic value, public recreation, and access to places depend on conservation and management of the area's resources.

Without question, present and future benefits of the area depend on conservation and management of the area's resources. This is especially critical in the face of a changing climate and increasing stresses on fish and wildlife.

The area provides or enhances opportunities for research in marine science, including marine archaeology.

Scholarly research on the seabirds of St. George Island dates back at least to the 1970s and 1980s^{3,4}; and, as noted in the book excerpt above, there has long been interest in establishing an International Bering Sea Ecosystem Research Station. Designation of a marine sanctuary would enhance prospects for increased research activity benefiting

² <http://www.apiai.org/tribes/st-george/>

³ Hickey, Joseph J., and E. L. Craighead. 1977. A census of seabirds on the Pribilof Islands. In: Environmental Assessment of the Alaskan Continental Shelf. — Annual Rept. of Principal Investigators. Vol. 2, March 1977. NOAA/OCSEAP.

⁴ Roby, D. D. and K. L. Brink. 1986. Breeding biology of Least Auklets on the Pribilof Islands, Alaska. Condor 88:336-346.

conservation and management of the area's natural resources and those of the larger Bering Sea.

The area provides or enhances opportunities for education.

Opportunities to increase research activity on St. George go hand in hand with opportunities to increase education in two respects: First, visiting researchers have much to learn from the people of St. George about the area and the Bering Sea. For instance, in the early 1980s, researchers turned to the collective knowledge of the residents of St. George to help understand potential causes of the decline of Least Auklets over the past century⁵. Second, residents of St. George, and especially young people who potentially have career interests in the conservation and management of natural resources, will have an opportunity to interact with and learn from visiting researchers and natural resource managers. In addition, tourists and other visitors will have exceptional opportunities to learn, both from residents and researchers.

A national marine sanctuary would provide unique conservation and management value for this area or adjacent areas. [and] The existing regulatory and management authorities for the area could be supplemented or complemented to meet the conservation and management goals for the area.

The combination of a St. George Marine Sanctuary and the St. George part of the Alaska Maritime National Wildlife Refuge, in addition to active engagement by St. George residents, would indeed provide unique conservation and management value for the area. This complementary blend of land areas would both inform and supplement regulatory and management authorities and actions by the National Marine Fisheries Service, U.S. Fish and Wildlife Service, and North Pacific Fishery Management Council. The combination of a marine sanctuary, a national wildlife refuge, and community engagement would enable an integrated, comprehensive approach to management, informed by science and local and traditional knowledge.

There are commitments or possible commitments for partnerships opportunities. [and] There is community-based support for the nomination expressed by a broad range of interests.

Audubon writes this letter in part to encourage an action that will help protect St. George's globally significant populations of birds and wildlife. Additionally, we stand in strong support for the self-determination, leadership, and conservation stewardship exhibited by the St. George community. We are excited about possibilities for long-term

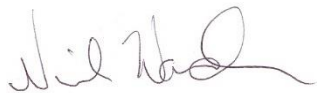
⁵ Roby, D. D. and K. L. Brink. 1986. Breeding biology of Least Auklets on the Pribilof Islands, Alaska. Condor 88:336-346.

cooperative partnerships and we are delighted to see a community driving the conversation for a marine sanctuary that will directly benefit the lives of local people.

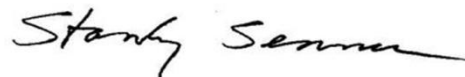
In summary, Audubon enthusiastically supports the concept of a national marine sanctuary around St. George Island. The fish and wildlife resources of the area are extraordinary, as is the opportunity to integrate the interests and expertise of the St. George community with those of federal and states agencies, academic institutions, conservation organizations and others. A national marine sanctuary designation would enhance conservation and management of the natural resources on which the lives and economy of the St. George community depend.

Thank you for your consideration in this important matter.

Sincerely,



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