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Paul E. Michel
Regional Policy Coordinator
NOAA Sanctuaries West Coast Region
99 Pacific Street, Bldg. 100F
Monterey, CA 93940.

Dear Mr. Michel:

We appreciate the opportunity to provide comments on the Office of National Marine Sanctuaries (ONMS) five-year review of the St. George Unangan Heritage National Marine Sanctuary nomination.

The Pribilof Islands are among the most unique and important places in the world. The islands and surrounding waters provide vital breeding and feeding habitat for more than half of the world's population of northern fur seals, as well as important habitat for Steller sea lions and harbor seals. More than three million seabirds flock to the islands during the summer months, and by virtue of their position straddling the continental shelf and deeper ocean waters, the islands play a central role in creating the productive ocean zone that supports some of the world's most profitable commercial fisheries.

The Pribilof Islands were used, but not permanently inhabited, by Unangan (or Aleuts) until Russian fur traders enslaved hundreds of Unangan from the Aleutian Islands and forced them to settle on St. George and St. Paul as an enslaved workforce for commercial seal harvesting operations. This economic endeavor continued under the Department of Commerce and ended in 1978 on St. George and in 1983 on St. Paul. Currently, the communities on St. Paul and St. George are directly experiencing a rapidly transforming marine ecosystem, including alarming declines of fur seals, sea lions, seabirds, fish, and invertebrates, with real costs to wildlife, human and ecosystem health, local economies, and culture. Large-scale commercial fisheries, climate change, and the residual impacts of overexploitation of marine resources (e.g., blue and red king crab, halibut, fur seals) are contributing factors to these declines. These changes and the dramatic effects they are having demonstrate the ongoing and urgent need for innovative and adaptable local solutions.

As demonstrated by the January 2017 decision to add it to the inventory of successful nominations, the existing Unangan Heritage National Marine Sanctuary nomination clearly meets the "11 evaluation criteria" considered by ONMS. The City of St. George is to be congratulated for its foresight in furthering this nomination, and there is no question that the Pribilof Islands are an ecologically, socio-economically, and culturally significant area warranting a designation and inclusive management approach.

Indigenous and Traditional Knowledge gathered and documented from the islands highlights that the marine waters extending at least as far as 100 nm around St. Paul and St. George are of central importance to the communities, marine mammals, seabirds, and other resources. This knowledge is verified by extensive western science that includes studies of fur seal foraging areas, bathymetry, oceanography, primary productivity, and other disciplines. There is an opportunity and need for comprehensive, science and knowledge-based management approaches that account for this information and consider the larger area.

As the federal government considers designation and management in the Pribilof Islands marine ecosystem, there is also an important opportunity to further the Biden-Harris Administration's

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commitment “to support and help advance the priorities of American Indian, Alaska Native, Native Hawaiian, and Indigenous leaders,” in meeting 30x30 goals. As the Administration has made clear: “Efforts to conserve and restore America’s lands and waters must involve regular, meaningful, and robust consultation with Tribal Nations. These efforts must respect and honor Tribal sovereignty, treaty and subsistence rights, and freedom of religious practices.” By following the communities’ lead and working to further co-management with the federally recognized tribal governments of St. Paul and St. George in the Pribilof Islands, ONMS can make substantial progress toward fulfilling these commitments.

In summary, the Pribilof Islands marine ecosystem is a large area of vital ecological, economic, and cultural importance. This larger area, which fully encompasses the St. George Unangan Heritage NMS nomination area, clearly satisfies the evaluation criteria based on significant amounts of western science, Traditional, Indigenous and Local Knowledge. The designation of an area of at least 100nm around both Pribilof Islands will ensure successful outcomes that are rooted in tribal co-management and centered on Indigenous values.

Sincerely,