

## **Nomination Addendum**

**February 15<sup>th</sup>, 2022**

**Nomination Title:** Alaġum Kanuuġ (Heart of the Ocean; Pribilof Islands Marine Ecosystem (PRIME) Initiative)

**Name and affiliation of proposal nominator:** Amos Philemonoff, President, Aleut Community of St. Paul Island Tribal Government (ACSPI)

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### **Reason for Addendum:**

The nomination of Alaġum Kanuuġ proposes specific and novel constructs within the National Marine Sanctuary framework. If designated, Alaġum Kanuuġ would be the first sanctuary in the Alaska region and the first based on co-management with a federally recognized tribal government. As the nomination document articulates, Alaġum Kanuuġ is situated in the center of some of the world's most productive commercial fisheries. Since the nomination was first transmitted to NOAA ONMS, we the nominators have engaged directly with fishery stakeholders, managers, and other individuals and organizations whose perspective will be integral to the designation process. Due to the complex nature of the nomination and our correspondence and developments with stakeholders, we find it necessary to provide additional information to further explain key goals for the NOAA national significance and management considerations review. Specifically, this addendum is intended to expand upon and clarify the following:

- 1) The conceptual nature of a co-management framework, contextualizing the stated sanctuary goals in the nomination;
- 2) Our vision for collaborative fisheries management with the North Pacific Fishery Management Council (NPFMC) within Alaġum Kanuuġ; and
- 3) Additional detail on St. Paul Island's facilities and resources to accommodate and operate a sanctuary.

### ***Co-management***

Although still a relatively novel regulatory concept in the U.S., Indigenous-led conservation is gaining visibility and viability at the highest levels of government. In Canada, co-management of protected and conserved areas are linked with pursuing reconciliation with Indigenous Peoples. For example, 18 national parks have been established with a co-governance framework with First Nations and the Government of Canada. Co-management has the potential to provide environmental and societal benefits, as well as technical and financial support in management activities. It incorporates Indigenous and local knowledge into resource management decisions and facilitates approaches that are more culturally and ecologically appropriate. A

meta-analysis of more than 130 community-based marine co-management arrangements worldwide found that with strong tribal leadership and support, co-management can contribute to the successful management and sustainability of resources.<sup>1</sup>

The Aleut community of St. Paul Island Tribal Government defines co-management as: formal agreement on a governance structure whereby federally recognized tribal governments and the federal government share equitable rights and obligations to the management and allocation of a resource or resources. This includes consensus decision-making, equitable representation of representatives of the federally recognized tribes and the federal government, and a true partnership between the federally recognized tribes and the federal government at the highest levels.

The second and fifth goals for the sanctuary articulated in the nomination speak to our vision for co-management agreements and the anticipated results of this approach, all with an eye towards achieving enhanced economic and ecological resilience for our community and sanctuary resources post-designation. In order to illustrate this approach, we have provided a conceptual framework diagram (see Attachment 1) describing our intended system and process for designation under a co-management framework.

Equally as important to note is what co-management is not. Co-management is not cooperative management whereby tribal co-managers operate under state or federal-driven governance structures and regimes. Co-management is not dual management where the tribal governments are managing separately alongside the federally government in a disconnected and non-comprehensive approach.

We envision a co-management agreement that is equitably co-produced (i.e. defined, described and implemented) with tribal government leadership of the representative effort, at the core of tribal-led stewardship efforts under the appropriate establishment language under the National Marine Sanctuaries Act. Any additional/ancillary agreements will necessarily take different forms according to the priorities, needs and goals of a specific issue, although they will be generated and executed under the auspices of the framework agreement.

We envision a four-party agreement and framework for the co-management of Alaġum Kanuuġ. The parties would include tribal, state, and federal governments. We have reviewed the various examples of co-management within the National Marine Sanctuary System and find that there exists sufficient precedent for co-management of sanctuaries between sovereign governments and evidence of successful collaborative efforts between states and the US government. There appears to be no statutory or regulatory barriers to developing a co-management framework with tribal, state, and federal government parties.

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<sup>1</sup> Gutiérrez, N. L., Hilborn, R., & Defeo, O. (2011). Leadership, social capital and incentives promote successful fisheries. *Nature*, 470(7334), 386-389.

We therefore conceive of an overarching framework agreement between the co-managing parties that will govern our collective operations and structure, our roles in developing the sanctuary designation document, regulations, advisory council charters, and management plans. It should also contain explicit directives and guidance on partnership, project implementation, operational decision-making, stakeholder engagement, and problem solving. The agreement would also embrace and delineate principles and specific approaches for the collection of Tribal Ecological Knowledge and its use in Sanctuary co-management.

### ***Relationship to fishery management***

St. Paul is committed to transparency and early engagement with fishing industry stakeholders, including industry and state & federal managers. In order to facilitate this direct engagement, we believe it would be appropriate to convene an Advisory Council on Designation at the earliest possible opportunity. This process would take place subsequent to the announcement of NOAA's intention to pursue designation, the development of a co-management agreement and framework, and the development of an Advisory Council charter. We hope to reach this stage expeditiously and to include numerous stakeholder seats reflective of the diverse industry interests in the Bering Sea. We also intend to solicit the input of agency partners, including the NMFS Alaska Region, the Fish and Wildlife Service, the North Pacific Fishery Management Council (NPFMC), and others as future discussions develop.

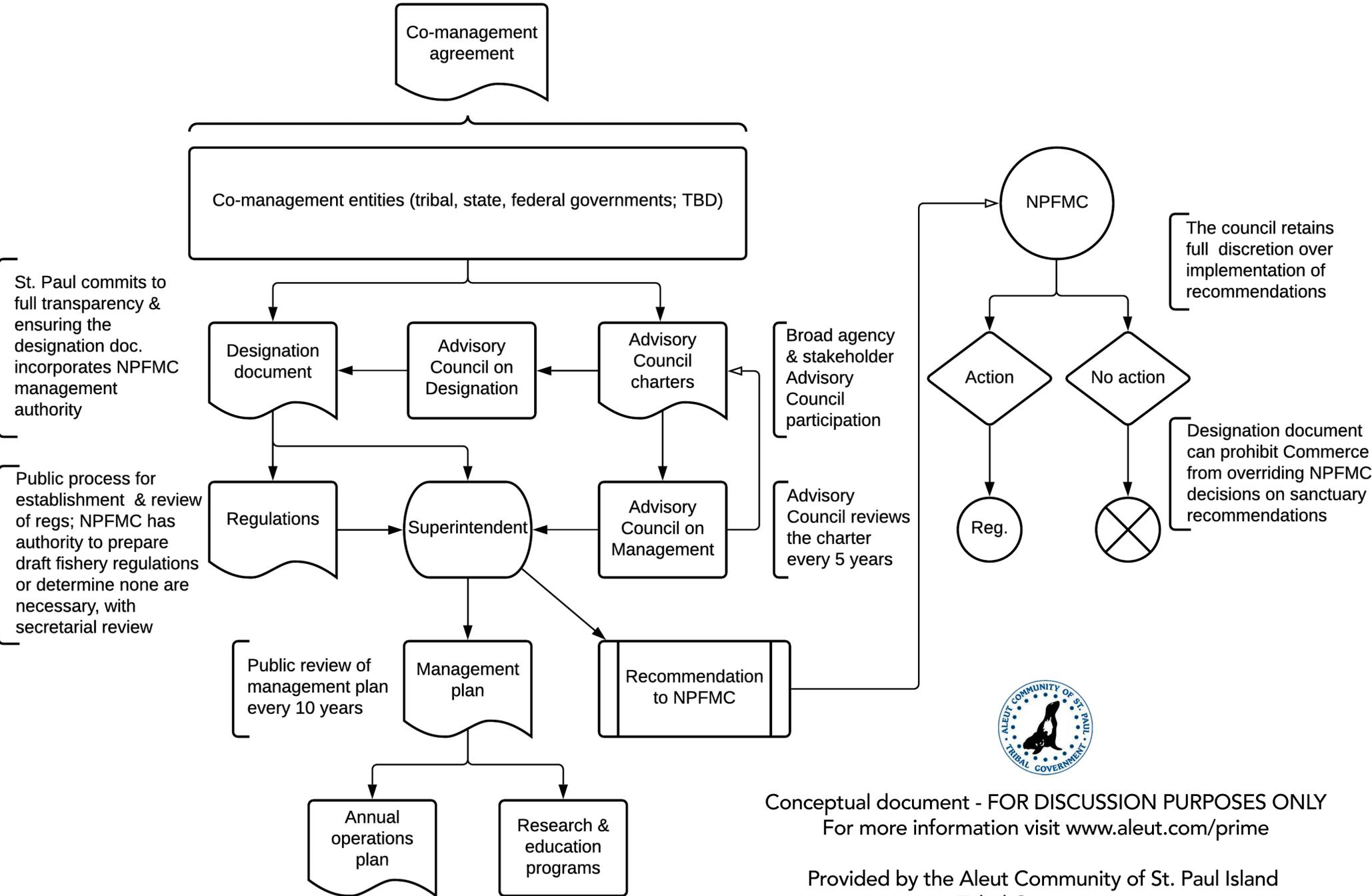
The seventh goal for the sanctuary articulated in the nomination speaks to this intention. We believe that the development of new measures for food security, like low-trophic mariculture and subsistence fisheries harvest, belong under the auspices of a co-management agreement. However, our intention in designating Alaġum Kanuuŋ is for NPFMC management of fisheries to be acknowledged within the designation document. We do not intend that the designation delegate any new authorities to supersede NPFMC management. We intend for a second Advisory Council on Management, convened after designation is completed, to serve as the place where collaborative approaches to responsible management are developed and subsequently transmitted to NPFMC (see Attachment 1).

### ***St. Paul Island facilities***

The St. Paul Tribal Government owns and operates state-of-the-art research facilities, and has residential and office space that is capable of addressing many of the research and administrative needs of the sanctuary. A detailed description of these facilities can be found in Attachment 2.

# Attachment 1

## Designation process & proposed management structure of Alaġum Kanuux



Conceptual document - FOR DISCUSSION PURPOSES ONLY  
 For more information visit [www.aleut.com/prime](http://www.aleut.com/prime)

Provided by the Aleut Community of St. Paul Island  
 Tribal Government

## Attachment 2 - St. Paul's Bering Sea Research Center (2021) - Opportunity to establish Alaġum Kanuuġ facilities



The Aleut Community of St. Paul's economic community vision statement is:

**“An Aleut community of healthy, resilient people working together to sustain a robust fishing-based economy”.**

St. Paul has worked persistently to establish an island-based research center for over three decades. In the early 2000's a research center investment was considered by both federal and local partners as part of a crab disaster relief program following the collapse of the opilio crab stocks. Unfortunately, the capital could not be raised at that time to construct the \$15M project with land, or lack of land, also preventing the project from moving forward.

The Aleut Community however did not give up on establishing a research center for St. Paul and maintained that goal in every 5-year Community and Economic Development Strategy since 1996. In the community's most recent Economic Development Plan (2017-2022) the research center was identified as the #2 community goal followed only by the #1 Goal to “Support, Protect, and Create New Fishing Opportunities” as shown in Figure 1 below. These facilities are available for Alaġum Kanuuġ research and operations.

## Attachment 2. St. Paul's Bering Sea Research Center - Opportunity to establish Alaġum Kanuuġ facilities



**Figure 1: Aleut Community of St. Paul's Strategic Economic Development Goals (2017-2022)**

In recent years 2017-2021 the Aleut Community of St. Paul with local partner Central Bering Sea Fisherman's Association (CBSFA) completed major infrastructure projects necessary to support a Bering Sea research center in St. Paul. In total and with some federal assistance over \$20M was invested into shoreside facilities, docks, vessels, housing and STEM education. With this critical infrastructure in place the Aleut Community is now focusing it's efforts on furnishing, equipping and operating a Bering Sea research center including finding partners and funding to support sustainable operations. A summary of investment and tribal assets that are in place on St. Paul Island, AK, as of December 2021 is as follows.

### ***St. Paul Marine Center (Completed 2021)***

Cost: \$15,100,000

Owner: Aleut Community of St. Paul Island

Purpose and Use:

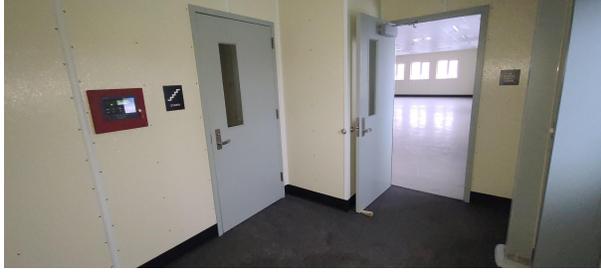
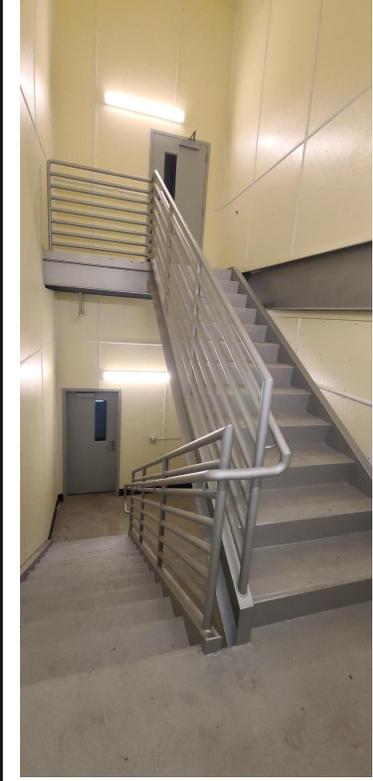
- Research Center – Provides 9,600sqft of light industrial and field office space to support a Bering Sea research center.
  - 3200 sq ft - Dry Lab and Field Offices
  - 1600 sq ft - Wet Lab Area with Saltwater Supply and Return
  - 4,800 sq ft – Open and Available to Furnish, Design, or Develop as Needed
- Vessel Repair - Provides 9,600sq ft of industrial vessel repair space with large access doors to support the local fishing fleet.
- Warehouse – Provides 7,200 sqft of warehousing and heavy equipment bays.
- Permanent Dock – Provides 60ft steel, concrete, and timber-deck mooring facility

St. Paul Marine/Research Center Photos



Research Center is located on Tribe's waterfront property in St. Paul's Small Boat Harbor



Research Center Area – Downstairs	Research Center Area - Upstairs
	
Downstairs Entrance	Wet Lab Area
	
Upstairs Entrance	Center Warehouse, Overhead Crane, IT Room

***Other Tribal Supporting Infrastructure available for Alaġum Kanuuċ (2015-2021)***

Owner: Aleut Community of St. Paul Island

Purpose and Use:

- Tribal Office
  - Aleut Community Tribal Government Administrative Headquarters
- St. Paul Health Center
  - Aleut Community’s Tribal Operated Health Center
- Aleut Community Store
  - Aleut Community’s Owned and Operated General/Grocery Store
- Bering Sea Campus
  - Tribal Operated Education Agency focused on STEAM Curriculum
  - UAF, UAA, Ilisagvik College Partners

- o 3,600sqft Leased from Pribilof School District
  - Learning Center
  - Computer Labs
  - Summer Youth Camps
  - After School STEM Tutoring
- Tribal Transient Housing Quarters
  - o Provides 9,850sqft of furnished premium housing for research center staff and guests.
- Tribal Research Vessel Lunax
  - o 29-foot Defender Class Safeboat

Research Vessel Lunax, Guest Housing, and Other Tribal Assets.



Tribe's Research/Search & Rescue Vessel – LUNAX



Lunax Research Team – Mapping & Surveying



Location of Tribal Visiting Staff and Guest Quarters – 15 bedrooms





Other Tribal Owned & Operated Assets – Aleut Community Store, Tribal Office, St. Paul Health Center, and Bering Sea Campus



Young Aleuts Participating in Science Curriculum with Bering Sea Campus Guest Scientists

***Existing NOAA Infrastructure***

Purpose and Use:

- NMFS Staff Quarters
  - Housing Quarters for Visiting NOAA, NMFS, NMML Personnel and Guests
- NMML Lab
  - Lab facility support Northern Fur Seal Fieldwork
- GARCO Garage
  - NOAA Warehouse

NOAA, NMFS, NMML Facilities

