

July 18, 2023

Dear Colleagues:

The Aleut Community of St. Paul Island Tribal Government has received a copy of the letter you submitted to Administrator Spinrad on March 24, 2023. We appreciate the explanation of your concerns and hope that this correspondence can be the reopening of a dialogue among us. We write directly to you, in the spirit of collaboration and respect, with the intention of providing context, sharing information, and seeking common ground.

The Aleut Community of St. Paul Island (ACSPI) is the title by which the federal government of the United States formally recognizes our tribal sovereignty; a nation born, living, and self-governing before the United States was conceived. Our Tribal Government is the venue through which Unangan (“The People of the Sea” or “The Aleut Peoples”) of St. Paul Island can fulfill our intrinsic rights and responsibilities, and support, recollect, practice, and pass on our culture. The ACSPI Tribal Government promotes, maintains, and protects cultural practices, awareness, preservation, self-governance, and self-determination for the tribal members of ACSPI.

Unanga have stewarded our ocean and its resources long before there were commercial fisheries or government agencies. While there may be other ties to our community, we represent our people and bear witness to economic challenges, the need for cultural connection, and a rapidly changing marine environment. We have taken, and will continue to take, the steps necessary to ensure a vibrant future for the people of St. Paul Island.

As part of fulfilling that commitment to our people, we chose to submit a nomination for a National Marine Sanctuary in our waters. We did so after we conducted extensive research and in consideration of the tools available to us to elevate Unanga voices in management decisions that affect our ocean and resources. We believe that a sanctuary could provide funds and a public profile that can enhance tribal-led research; locally led tourism and education activities; workforce development, including jobs within a sanctuary office in the Pribilof Islands; and improved co-management of our marine resources. Additionally, our marine area is recognized as an incredibly productive and richly diverse habitat; designation would provide formal recognition for the area and honor the waters our people have stewarded for millennia.

Through the process of pursuing sanctuary designation, we have come to realize there are a number of shared questions and concerns related to co-management and commercial fisheries. We seek to work collaboratively with the federal government, fishing industry, and our community to answer those questions and create a shared and supported understanding. We hope that this letter provides additional clarity and evidences our commitment to collaboration and cooperation.

Co-Management

We are committed to co-management that incorporates indigenous and local knowledge into resource management decisions and facilitates approaches that are more culturally and ecologically appropriate. This includes consensus decision-making, equitable representation, and a true partnership between federally recognized tribes and the federal government at the highest levels. We believe that the sanctuary

process creates a path to government-to-government agreement that can effectuate this goal and elevate our Tribal Government management perspectives to an equal level with federal partners.

As a people who have endured decades of distrust at the hands of the federal government, we too seek clarification about what co-management means to the U.S. federal government. We seek a commitment to equitable, consensus-driven co-management decision-making authority in which responsibilities are shared among the tribal and non-tribal government signatories. It remains to be seen whether the federal government shares those goals.

Unequivocally, we do not seek to use a co-management agreement to change the fishery management process in any way. We share some of the same questions you have expressed about the mechanisms that might be used or limits that might be applicable. Again, we are working to address these questions in a collaborative way and would not support designation of a sanctuary that created economic or other hardship by affecting fishery management.

Management of Commercial Fisheries in a Sanctuary

As has been stated on several occasions, ACSPI has no intention of using a sanctuary nomination to undermine the North Pacific Fishery Management Council (the Council) process. We would not agree to the designation of a sanctuary that did so, and we believe that the National Marine Sanctuaries Act creates a legal pathway to prevent the concern you express about the potential for “undermining” that process. We agree that the federal government should be very explicit about the primacy of the Magnuson-Stevens Act process and have been working with the federal government to do so. We will not support the designation of a sanctuary until we have this assurance, and we would welcome your ideas about how best to achieve it.

Similarly, concerns have been expressed that assurances or partnership with ACSPI is insufficient because the federal government could proceed to designate a sanctuary or change fisheries management even without ACSPI’s support or consent. We agree with these concerns and agree that designation and any future management decisions or changes should be undertaken with participation from the Council and broad public engagement. Moreover, a co-management agreement would ensure that ACSPI will be engaged in any designation and ongoing management of a sanctuary.

Finally, to the extent we seek changes in fishery management, we are committed to working through the Council process to achieve them. We do believe, for example, that western science and our traditional and indigenous knowledge show that there is some level of prey competition between lactating female fur seals and commercial fishing during the B season. We would welcome the opportunity to discuss this science and explore potential actions that could be supported in the Council process to alleviate competition that may be occurring.

It is our priority to get clarification from the federal government on these issues, and we do not seek to advance a sanctuary without the needed assurances. We understand and appreciate the importance of commercial fisheries and other economic opportunities for St. Paul, and we will not participate in a designation or other process that puts those opportunities at risk.

A sanctuary nomination is only one part of our work to ensure the economic, environmental, and cultural future of Unangan. While seeking clarification from the federal government on the issues above, we continue to work through existing processes to advance shared community priorities related to northern



fur seals, birds, local fisheries, science, marine debris, and other ocean issues. In all these efforts, we intend to move forward together with Tribal, industry, and other partners.

We appreciate the concerns expressed in your letter and hope that we can have an ongoing dialogue about these issues. Our door is open, and we remain available to explore collaboration, seek answers to questions, and to hear concerns.

Sincerely,

A handwritten signature in blue ink that reads "Amos T. Philemonoff, Sr." The signature is written in a cursive style and is positioned above a thin horizontal line.

Amos T. Philemonoff, Sr.
President, Aleut Community of St. Paul Island