UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
NATIONAL OCEAN SERVICE

Office of National Marine Sanctuaries
1305 East-West Highway
Silver Spring, Maryland 20910

January 23, 2015

Richard Steiner
Box 666
9138 Arlon St., A3
Anchorage, AK 99507

Dear Mr. Steiner:

Thank you for submitting the nomination for the proposed "Aleutian Islands National Marine Sanctuary." We appreciate your interest in how a national marine sanctuary could assist in meeting conservation objectives for waters surrounding the Aleutian Islands and southwest Alaska.

This letter is to inform you that the Office of National Marine Sanctuaries (ONMS) has completed its sufficiency review of the nomination. The sufficiency review is the first of three phases of review, and determines if the nomination provides enough of the information required for us to proceed with a more in-depth review. It is followed by phase two, which reviews a nomination against the four national significance criteria and phase three, which evaluates a nomination against the seven management considerations. We have concluded the nomination, as submitted, is not sufficient.

Our rationale for reaching this conclusion focuses primarily on management consideration #7, which indicates a national marine sanctuary nomination must demonstrate support for the national marine sanctuary concept from a breadth of community interests. In our final rule, we define a community as individuals or locally-based groups (e.g., "friends of" group, chamber of commerce); tribal, local, state, or national agencies; elected officials; or topic-based stakeholder groups, at the local, regional or national level (e.g., a local chapter of an environmental organization, a regionally-based fishing group, a national-level recreation or tourism organization, academia or science-based group, or an industry association).

When ONMS considers this aspect of a nomination, we are not looking for unanimous support from all potential interests, but rather representative support from a diverse cross section of the community. In the context of the Aleutian Islands nomination, this could mean adjacent tribal or local governments, organizations or industries that depend on the resources in the nominated area, or federal or state agencies responsible for managing some of the resources or adjacent marine protected areas referenced in the nomination.

Similarly, the nomination does not clarify the level of support from the federal and state agencies listed as potential management partners. For management consideration #6, it is equally important to identify any offers of partnership from tribal governments, local jurisdictions, non-government organizations, or universities to assist in managing this area.

We also conclude that the nomination provides little to no description as to how this area provides opportunities for education, such as specific partnerships and commitments from educational groups. This relates to management consideration #2, which requests information on how the nominated area provides or enhances opportunities for education, including the understanding and appreciation of the marine and Great Lakes environments.

Finally, the nomination's description under national significance criteria #2 (submerged maritime heritage resources) states the nominated area "contains submerged maritime heritage resources of special historical, cultural, or archaeological significance…consistent with listing on the National Register of Historic Places." It then identifies several land-based National Historic Landmarks, as well as shipwrecks and potential archaeological sites that appear to all be within Alaska state waters. However, page 3 of the nomination identifies the proposed sanctuary to include "all federal waters along the entire Aleutian Islands archipelago (from 3 to 200 nautical miles north and south of the islands…" As a result, the nomination seems to indicate both inclusion and exclusion of state water resources.

We understand the significant challenges associated with organizing support for an area that covers over 550,000 square nautical miles and over a thousand miles of shoreline. An alternative could be to consider nominating a smaller area or a series of smaller areas that encompass the specific resources you believe to be of highest value or for which a national marine sanctuary designation could achieve the greatest benefit. Keep in mind that the nomination process is a community-based process and hence the demonstration of wide community support weighs very heavily within the management considerations.

As you reconsider your nomination, staff from our West Coast Regional Office, as well as our headquarters, stand by to address any questions you have. We encourage you to review other nomination packages we have received and our correspondence with the nominators, which are available on the website nominate.noaa.gov. The process is transparent and you will also find our correspondence with other nominators on the website. Thank you again for your interest in NOAA's national marine sanctuaries. We look forward to continuing work with you on this important nomination.

Sincerely,

Daniel J. Basta, Director