
PACIFIC FLYWAY COUNCIL

Alaska • Arizona • California • Colorado • Idaho • Montana
Nevada • Oregon • Utah • Washington • Wyoming



September 20, 2007

Northeast NPR-A Supplemental IAP/EIS Comments
ENSR Project Office
1835 South Bragaw Street, Suite 490
Anchorage, Alaska 99508

The Pacific Flyway Council is composed of representatives from each wildlife agency in the 11 western states (Alaska, Arizona, California, Colorado, Idaho, Montana, Nevada, Oregon, Utah, Washington, Wyoming), as well as representatives from the states, provinces, and territories of western Canada and Mexico. Council members work in conjunction with the federal governments to manage migratory birds and their habitats throughout a large part of North America.

Our council has previously gone on record opposing oil and gas leasing in the critical goose molting grounds of the Northeast National Petroleum Reserve-Alaska (NPR-A), north of Teshekpuk Lake (see attached correspondence). We request that these comments be included for consideration by the Bureau of Land Management during the comment period for the Northeast NPR-A ending next month.

Thank you for your consideration of these comments in developing the Northeast NPR-A Supplemental Integrated Activity Plan/Environmental Impact Statement (IAP/EIS).

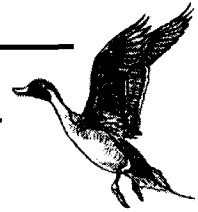
Sincerely,

Dave Britnell, Chair
Pacific Flyway Council

cc: U. S. Department of the Interior Secretary Dick Kempthorne
U.S. House Representative Norm Dicks
Pacific Flyway Council

Pacific Flyway Council

Alaska • Arizona • California • Colorado • Idaho • Montana • Nevada • Oregon • Utah
Washington • Wyoming



August 1, 2006

The Honorable Dirk Kempthorne, Secretary
Department of the Interior
Main Interior Building
1849 C Street, NW
Washington, D.C. 20240

Dear Secretary Kempthorne:

The Pacific Flyway Council is aware that the Bureau of Land Management (BLM) has scheduled oil and gas lease sales for September 2006 in the Northeast Planning Area of the National Petroleum Reserve-Alaska (NPR-A). The Council has a strong interest in the habitats of NPR-A that support abundant and valuable migratory bird resources, particularly the Teshekpuk Lake Special Area that constitutes a secure, traditional molting site for 50-90,000 geese, particularly Pacific brant. We wish to reiterate and emphasize the importance of these resources and our concern that management of the area recognize and preserve these values.

For your information, previous Council correspondence on this issue are enclosed.

Sincerely,

A handwritten signature in cursive script that reads "Terry M. Mansfield". The signature is written in dark ink and is positioned above the typed name.

Terry M. Mansfield
Chairman, Pacific Flyway Council

TMM:th

Enclosures

c: James Connaughton, Chair, Council on Environmental Quality
Henri Bisson, State Director, Bureau of Land Management, Anchorage
Tom Melius, USFWS Regional Director, Anchorage
McKie Campbell, Commissioner, Alaska Department of Fish and Game

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August 1, 2005

Ms. Gale Norton, Secretary
Department of the Interior
Main Interior Building
1849 C Street, NW
Washington, D.C. 20240

Dear Ms Norton:

The Pacific Flyway Council is aware that you are preparing a Record of Decision on the final Amended Integrated Activity Plan and Environmental Impact Statement (IAP/EIS) for Northeast Planning Area of the National Petroleum Reserve-Alaska (NPR-A). The Council wishes to express its continuing concerns regarding the Bureau of Land Management's current preferred alternative to significantly increase oil and gas leasing in the 4.6 million-acre Northeast Planning Area, particularly in the 450,000-acre Goose Molting Area (GMA) north of Teshekpuk Lake.

The Pacific Flyway Council strongly encouraged the Bureau to preclude development in the GMA and to confer permanent surface protection to this unique and valuable habitat in its comments on both the 1998 EIS for the Northeast Planning Area that deferred leasing of any of the GMA, and the 2004 draft EIS that proposed leasing of 45% of the GMA (Alternative B). The Council continues to believe that the waterfowl values and other wildlife resources of this area are too unique and important to risk under the new preferred Alternative D—offering 100% of the GMA for lease in seven tracts with surface protection measures. Alternative D would allow facilities and infrastructure for oil and gas production to impinge on sensitive molting geese at up to seven centers throughout the entire GMA. This approach minimizes the value of contiguous undisturbed habitat that is the essence of why molting geese have established a strong tradition of molting in the Teshekpuk Lake region.

The Resources at Stake

The Council has a strong interest in the habitats of NPR-A that support abundant and valuable migratory bird resources, particularly the Teshekpuk Lake Special Area (TLSA) that constitutes a secure, traditional molting site for 50-90,000 geese. There are several key reasons why this area is of exceptional importance to waterfowl, other wildlife, and broad public values of those resources:

- Ecologically, this region contains extensive wetland and tundra habitats that have a regionally distinctive origin, unique characteristics that attract breeding and molting waterfowl, and are sensitive to perturbations.
- During summer, TLSA is the largest and most significant molting area for Pacific black brant, supporting up to 37,000 brant (30% of the entire population) from breeding grounds in Canada, Russia, and mostly (up to 70%) the Yukon-Kuskokwim Delta. In addition, some Western High Arctic brant from Canada now use TLSA during the molt; WHA brant are perhaps the smallest goose population in North America. The Council is particularly concerned about impacts that could accelerate declines in black brant (currently within 5,000 birds of a threshold established to close all hunting) or increase risks to the small population of WHA brant.

Letter to Secretary Norton

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- TLSA is the major molting ground for Midcontinent white-fronted geese that breed on the North Slope. Recent surveys indicate a significant increase in molting by these birds in TLSA—up to 35,000 and averaging over 23,000 for the past five years.
- Waterbirds that depend on NPR-A habitats, particularly waterfowl, are of high value to a wide range of constituents from Russia, Arctic Canada, Alaska, Pacific coast states, and Mexico. White-fronted geese, pintails, and tundra swans are important resources that move through the Central and Mississippi Flyways as far as Mexico. These migratory birds are highly valued for subsistence and recreational hunting, viewing, and education throughout western North America.

Conservation Measures for Pacific Brant

In January 2005, indices of Pacific brant reached an all-time low of 111,387. This total is comprised of a record-low number of black brant (101,391) that breed primarily in western and northern Alaska, and about 10,000 Western High Arctic brant that nest in Canada. The Council, in its management plan for these populations, has maintained conservative harvest guidelines for many years to sustain brant as they have gradually declined over 30 years. Since 1998, black brant have declined more steeply and are now at record low numbers. The Council has determined that the population now warrants a very restrictive hunting regime throughout its range, implemented through a 50% reduction in harvest. The following measures are scheduled for 2005-2006 hunting seasons:

- Fall/winter hunting seasons have been shortened by half in Alaska, Washington, Oregon, and California.
- Subsistence hunting of all birds will be closed around five major brant colonies on the Yukon-Kuskokwim (Y-K) Delta.
- Subsistence hunting of brant will be closed on the Y-K Delta from nest initiation in May through the fledging of young.
- Subsistence hunting of brant will be closed at Izembek Lagoon in August.
- Harvest reductions will be sought for subsistence hunting on the North Slope and for hunting in Mexico.

As onerous as these harvest restrictions are in significant losses of public use values, the Council also is deeply concerned about factors that could affect the condition and survival of brant, and exacerbate the population decline. We believe that the nature and scope of oil and gas leasing proposed in northeast NPR-A entails a high risk of affecting a significant portion of the brant population, as well as large number of other waterfowl.

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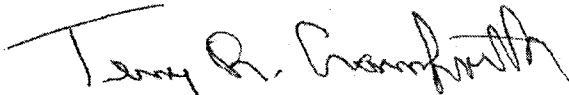
Assuring Long-term Protection of the GMA

Given the unique ecological features of the Teshekpuk Lake area, the abundance and special character of waterfowl resources, and the national and international public interests the resources of the NPR-A, the Council reiterates specific recommendations provided in 1998 and 2004:

1. The Record of Decision should specifically recognize the broad interests of stakeholders from other states, Arctic Canada, Russia, and Mexico in the migratory bird resources of the Northeast Planning Area, and rigorously assess the potential impacts of leasing and development on those interests.
2. The sensitive goose molting area should not be offered for leasing; it should not be open to construction of roads, pipelines, or other facilities; and seasonal human activity should be restricted, as necessary, to preserve the security of molting geese from disturbance.
3. The Pacific Flyway Council again recommends that the Teshekpuk Lake Special Area be given permanent protection from future development by Secretarial designation.

The Council appreciates the opportunity to express its concerns and advise as you consider the Record of Decision.

Sincerely,

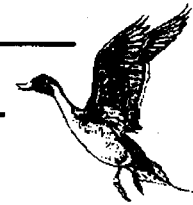


Terry Crawford
Chairman, Pacific Flyway Council

cc: James Connaughton, Chair, Council on Environmental Quality
Henri Bisson, State Director, Bureau of Land Management, Anchorage
Rowan Gould, USFWS Regional Director, Anchorage
McKie Campbell, Commissioner, Alaska Department of Fish and Game

Pacific Flyway Council

Alaska • Arizona • California • Colorado • Idaho • Montana • Nevada • Oregon • Utah
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July 2, 2004

Mr. Henri Bisson
State Director
Department of the Interior
Bureau of Land Management
222 W. 7th Avenue
Anchorage, AK 99513.

Dear Mr. Bisson:

The Pacific Flyway Council wishes to express its concerns regarding your agency's proposal to amend the 1998 Integrated Activity Plan/Environmental Impact Statement for the 4.6 million-acre Northeast Planning Area of the National Petroleum Reserve-Alaska (NPR-A): "... (1) to evaluate exploration and development opportunities that could provide access to significant new oil discoveries, while remaining sensitive to biological and subsistence values and, (2) to consider changing the current prescriptive stipulations into a mixture of prescriptive and performance-based stipulations similar to those being developed for the Northwest portion of the National Petroleum Reserve."

The Pacific Flyway Council is an organization of the fish and wildlife agencies of the 11 western states, British Columbia, Alberta, and cooperators in Mexico. The Council facilitates the scientific management of migratory birds and their habitats, in association with federal agencies and other cooperators, to sustain and enhance the public's resource interest in the U.S., Canada, and Mexico.

The Council has a strong interest in the habitats of NPR-A that support abundant and valuable migratory bird resources, particularly those in the Teshekpuk Lake Special Area (TLSA) that constitute a secure, traditional molting site for 50-90,000 geese. There are several key reasons why this area is of exceptional importance to waterfowl, other wildlife, and broad public values of those resources:

- Ecologically, this region contains extensive wetland and tundra habitats that have a regionally distinctive origin, unique characteristics that attract breeding and molting waterfowl, and are sensitive to perturbations.
- During summer, TLSA is the largest and most significant molting area for Pacific black brant, supporting up to 30% of the entire population from breeding grounds in Canada, Russia, and mostly (up to 70%) the Yukon-Kuskokwim Delta. In addition, some Western High Arctic brant from Canada now use TLSA during the molt; WHA brant, at less than 10,000 birds, are perhaps the smallest goose population in North America. The Council is particularly concerned about impacts that could accelerate declines in black brant (currently within 4,000 birds of a threshold established to restrict all hunting rangewide) or increase risks to the small population of WHA brant.

- TLSA is the major molting ground for Midcontinent white-fronted geese that breed on the North Slope. Recent surveys indicate a significant increase in molting by these birds in TLSA—up to 35,000 and averaging over 23,000 for the past five years.
- Waterbirds that depend on NPR-A habitats, particularly waterfowl, are of high value to a wide range of constituents from Russia, Arctic Canada, Alaska, Pacific coast states, and Mexico. White-fronted geese, pintails, and tundra swans are important resources that move through the Central and Mississippi Flyways as far as Mexico. These migratory birds are highly valued for subsistence and recreational hunting, viewing, and education across most of North America.

The Council has had a sustained interest in land use planning and potential effects on wildlife in NPR-A, providing comments during early development of an oil and gas leasing program in the 1980s, and again for the 1998 EIS for the Northeast Planning Area. Over the long term, despite several major planning processes and continuous dialogue on resource management, the Council's level of concern for waterfowl and wetlands in TLSA has increased, based on several milestones:

- In the 1980s, your agency established special areas within NPR-A, including the TLSA, to recognize high values to wildlife, yet none of these areas has been given enduring and substantial protection.
- There has been a steady erosion of boundaries of the TLSA, as management programs have evolved, reducing the amount of waterfowl habitat and molting lakes that are given special recognition.
- Through the 1998 EIS and record of decision, part of the TLSA was deferred from oil and gas leasing, but evaluation of the potential impacts of oil production in this areas was deficient in the EIS, eventual lease sales encroached further into TLSA, and there is still no firm commitment to long-term protection of core goose habitats.
- The announced intention of the current process to amend the Northeast Plan makes it clear that a primary focus will be leasing in TLSA—the only area of substantial petroleum interest that is not available. In addition, we are concerned about the outcome of revising protective stipulations and the parallel significant expansion of the Alpine satellite project into eastern NPR-A. Collectively, these processes have the potential for cumulative, long-term effects on wildlife that are far beyond the model of a few isolated “Alpine-type” scenarios presented in the 1998 EIS.
- Throughout most of the planning processes over 20 years, analyses of potential impacts of oil and gas activity on molting geese have not been rigorous and have not recognized the results of a substantial body of relevant research on disturbance and energetics. We recommend a more thorough and objective analysis of this critical subject.

Given the unique ecological features of the Teshekpuk Lake area, the abundance and special character of waterfowl resources, and the national and international public interests in the resources of the NPR-A, the Council reiterates specific recommendations provided in 1998:

1. The draft amended IAP/EIS should specifically recognize the broad interests of stakeholders from other states, Arctic Canada, Russia, and Mexico in the migratory bird resources of the Northeast Planning Area, and assess the potential impacts of leasing and development on those interests.
2. The sensitive goose molting area should not be offered for leasing; it should not be open to construction of roads, pipelines, or other facilities; and seasonal human activity should be restricted, as necessary, to preserve the security of molting geese from disturbance and stress.
3. The Pacific Flyway Council also recommends that the Teshekpuk Lake Special Area be given permanent protection from future development by Secretarial designation.

The Council appreciates the opportunity to provide advice during development of the draft amended IAP/EIS for the Northeast Planning Area, and we offer continuing expertise and input. The Council will maintain a strong interest in your process and choice of preferred actions.

Sincerely,



Miles Moretti
Chairman, Pacific Flyway Council

cc: Gale Norton, Secretary of the Interior
Rowan Gould, USFWS Regional Director, Anchorage
Steve Wendt, Chief of Migratory Bird Conservation, Canadian Wildlife Service
Kevin Duffy, Commissioner, Alaska Department of Fish and Game
Vernon Beville, Chairman, Central Flyway Council
Richard Wells, Chairman, Mississippi Flyway Council

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