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A program of the
Alaska Marine Conservation Council

November 24, 2006

Ms. Renee Orr, 5-Year Program Manager
Minerals Management Service (MS-4010)
Room 3120
381 Elden St.
Herndon, VA 20170

**Re: Comments on the Proposed 5-Year OCS Oil and Gas Leasing Program,
2007-2012**

Dear Ms. Orr,

Please accept these joint comments on the Proposed 5-Year OCS Leasing Program submitted on behalf of the Alaska Marine Conservation Council (AMCC) and World Wildlife Fund (WWF).

The Alaska Marine Conservation Council is a community-based organization dedicated to protecting the integrity of Alaska's marine ecosystems. These comments are made on behalf of our board, staff, and nearly 1,000 members – who include commercial and sport fishermen, subsistence harvesters, and coastal residents throughout Alaska. These individuals and their families are culturally and economically dependent on a healthy marine and coastal environment. A number of them make their living from fishing in the Bristol Bay region.

WWF US is the nation's largest conservation organization, representing 1.2 million members in the United States. For over 40 years, World Wildlife Fund has led international efforts to conserve the wealth of the Earth's biodiversity. We work with local communities, businesses, governments, and global institutions to address the broad spectrum of threats to wildlife and their habitat. In the Bering Sea, WWF engages Russian and American partners to address key conservation issues and develop solutions.

These are the third set of comments submitted by AMCC on the 5-Year OCS Leasing Program. Our comments throughout the process have stressed that the risks to the ecologically, culturally, and economically important aquatic resources of Bristol Bay are too great to justify offshore leasing in this region. **We are once again, requesting that MMS respect the current presidential withdrawal of the region and remove Bristol Bay from the 5-Year OCS Leasing Program.**

We are sending the enclosed comments through Public Connect and by regular mail postmarked by November 24. Thank you for the opportunity to provide our perspective.

Sincerely,

Eric Siy
AMCC, Executive Director

Margaret Williams
WWF, Director Bering Sea ecoregion Program

Kelly Harrell
AMCC, Project Director

cc: Governor-elect Sarah Palin
Sen. Ted Stevens
Sen. Lisa Murkowski
Rep. Don Young

❖ Introduction & Summary

On behalf of our boards, staff, and over 1 million members, AMCC and WWF urge MMS and the Secretary to remove the entire North Aleutian Basin (NAB) Planning Area from the 5-Year OCS Leasing Program. As members of the public, MMS manages the resources of the Outer Continental Shelf on our behalf. These comments represent our direct economic, social, and cultural interests and values in maintaining the health and vitality of Bristol Bay's unparalleled sea life, wild places, subsistence cultures, coastal communities, and fishing livelihoods. We believe that the best use and value for the Bristol Bay region is not short-sighted extraction of nonrenewable fossil fuels, but instead, preservation, stewardship, and respect for renewable, sustainable resources, near-pristine places, viable coastal communities, and healthy living marine resources. We believe that there is no extent of mitigation measures or government regulations that could allow for both of these types of uses and values to coexist.

Offshore oil and gas development in Bristol Bay does not represent a viable future vision for the Bering Sea ecosystem or for energy policy in our nation. Measures to increase energy efficiency, to promote conservation, and to expedite the development of renewable energy technologies should be the cornerstone of our nation's energy policy. Regardless of how the 5-year Program portrays itself as contributing to increased domestic availability of oil and gas, the United States still consumes more oil and gas than it is possible to produce domestically, even if all of our resources were tapped. Clearly, drilling offshore in areas of our oceans like Bristol Bay where tremendous tangible economic losses, as well as enormous intangible losses (i.e. bequest value, existence value, etc.), could occur is not sound energy, fisheries, or ocean policy for our country.

As are detailed in comments on the Proposed Program and the Draft EIS (submitted separately), MMS has demonstrated an inability or unwillingness to adequately address the tremendous economic, social, and cultural values associated with the continued health of the living marine resources of Bristol Bay and the southeast Bering Sea. This is especially true with regards to the extremely valuable commercial fisheries that take place within and surrounding the area proposed for leasing (Lease Sale 92 area). Limited leasing in the Sale 92 area does not eliminate or substantially reduce the potential for OCS development in the region to have significant, negative impacts on fish as a biological resource or on the commercial fisheries themselves. We are attaching maps which highlight the importance of the region in providing fish habitat and supporting commercial fisheries. AMCC's past comments in the Call for Information (CFI comments) also detailed the importance of commercial fisheries in the region.

Furthermore, it is not clear that MMS has the authority to include an area under withdrawal until 2012 in this 5-Year Leasing Program. Bristol Bay is still protected by the presidential withdrawal under Section 12 of OCSLA. In past programs, MMS has abstained from considering the inclusion of withdrawn areas in the 5-Year Program. MMS should continue this practice. **We urge MMS to respect the presidential withdrawal for the region which has a sound basis. Indeed protection has been provided by Bristol Bay either by Congress or the President since 1990.**

These joint comments submitted by AMCC and WWF on the 5-Year Proposed OCS Leasing Plan address 2 main issues:

- (1) The failure of MMS and the Secretary to consider Outer Continental Shelf Lands Act (OCSLA) Section 18 Principles in Relation to the North Aleutian Basin.
- (2) The need for MMS to reexamine the State of Alaska's position on OCS leasing in the North Aleutian Basin in light of the fact that Alaska's Governor-elect has

not had the opportunity to review this issue and associated stakeholder concerns.

❖ **Part 1: Inclusion of the North Aleutian Basin in the 5-Year Program Not Consistent with OCSLA Section 18**

Inclusion of the North Aleutian Basin in the Proposed Program demonstrates a clear error of judgment on the part of MMS and the Secretary in ensuring consistency of the 5-year leasing program with the principles of OCSLA Section 18.

Section 18(a)(1) directs the Secretary to consider the values of other OCS resources (renewable and nonrenewable) and potential impacts that OCS oil and gas activities could have on those resources and on the marine, coastal, and human environments (10).

Section 18(a)(2) lists 8 factors to be considered in deciding timing and location of leasing:

- (A) Geographic, Geological, and Ecological Conditions**
- (B) Equitable Sharing of Benefits and Risks
- (C) Location with Respect to National Energy Markets and Needs
- (D) Locations with Respect to Other Uses of the Sea and Seabed**
- (E) Interest of Potential Oil and Gas Producers
- (F) Laws, Goals, and Policies of Affected States
- (G) Environmental Sensitivity and Marine Productivity
- (H) Environmental and Predictive Information

Section (18)(3) requires the Secretary to formulate the 5-year program in a manner that obtains a proper balance between potential for environmental damage, discovery of oil and gas, and adverse impacts on the coastal zone by utilizing the above factors. MMS states that the “centerpiece of the comparative analysis is an estimation of net social value for each planning area that is derived by calculating the value of oil and gas resources minus the cost to industry and the environmental and social costs of developing these resources (12). It is not clear from the Proposed Program or from the Draft EIS that MMS and the Secretary have attempted in good faith to create an accurate analysis of the above factors.

MMS has failed to adequately consider the potential impacts to the vital fisheries of the North Aleutian Basin in its Section 18 analysis. In the Proposed Program, MMS cites Governor Murkowski’s request to include the Lease Sale 92 area as the reason for including Bristol Bay in the 5-year program (15). It appears from this statement that inclusion of this planning area has not been based upon a reasonable analysis of Section 18 factors, but instead upon this political request by the outgoing Governor.

The Proposed Program and the Draft EIS do not reasonably consider the ecological, cultural, and economic importance of fisheries that take place within and rely on habitat located within Bristol Bay and the southeast Bering Sea. The North Aleutian Basin, which occurs within the very productive shallow shelf zone of the Bering Sea, is often referred to as the nation’s ‘fish basket’ as it supports the largest percentage of domestic fish harvest in the U.S. (see AMCC Call For Information comments). Alaska’s groundfish fishery alone provide for more than 50% of the total weight of the nation’s fisheries landings (NMFS, 2004). More than 90% of this catch comes from the Bering Sea/Aleutian Islands groundfish fishery (*ibid.*). Major commercial fisheries that take place within the planning area and/or whose target species have important habitat within the

area include: pollock, Pacific cod, and flatfish (BSAI groundfish), Pacific halibut, red king crab, Tanner crab, herring, Bristol Bay salmon, Area M salmon. The combined annual value of these fisheries reaches into the billions. The 2004 value for BSAI groundfish alone was \$1.5 billion dollars (*ibid.*) Because fisheries are renewable resources, their value is tremendous and reaches beyond the estimated net benefits of anticipated production in the NAB planning area of \$7.7 billion dollars (p. 33). A recent report on the economics of Bristol Bay watersheds estimated that the net present value for healthy, wild salmon ecosystems in the Bristol Bay region is between \$6.3 and \$10.6 billion dollars (Duffield et al., 2006). This estimate was based only on direct economic uses of the Bristol Bay ecosystem including commercial and sport fisheries, sport hunting, subsistence uses, and tourism and wildlife viewing (*ibid.*).

Southeast Bering Sea fisheries are Alaska's most important renewable resource and can continue to provide economic benefit well into the future if managed correctly. Offshore oil and gas development has the potential to cause sustained damage, significant economic losses, and ongoing conflicts with these fisheries. The Proposed Program does not consider these potential impacts and which shows that MMS and the Secretary are falling short of comprehending the importance of these fisheries. We cite the following examples as evidence that MMS and the Secretary have conducted an arbitrary analysis under OCSLA Section 18 for the North Aleutian Basin Planning Area:

- **The summary of the EIS findings within the Proposed Program fails to mention commercial fisheries under the proposed action (p. 36-40).**

The Proposed Program makes no mention of Bering Sea fisheries in the discussion of North Aleutian Basin lease sales. The only reference to commercial fisheries comes under the "Selected Comments" section, where a number of groups are referenced as raising concerns about the risks of OCS development to the region's fisheries. The fact that many groups, including AMCC, have repeatedly expressed the importance of the region's fisheries through comments on the program, makes the disregard for commercial fisheries in the Proposed Program and the DEIS even more capricious.

Furthermore, the summary of EIS findings presented in the Proposed Program includes no reference to commercial fisheries. The summary only relates findings for recreational fisheries. Reading this, it would appear that no commercial fisheries even existed in the region. This is of concern in light of the fact that the summary of findings is what the majority of decision makers and the public rely on for information on the 5-Year Proposed Program and DEIS.

- **The net social value cost does not account for economic impacts to commercial fisheries.**

As mentioned above, the "centerpiece of the comparative analysis" for Section 18(a)(3) "is an estimation of net social value for each planning area that is derived by calculating the value of oil and gas resources minus the cost to industry and the environmental and social costs of developing these resources (p. 12).

The valuation of program alternatives in the Proposed Program suggests quantifiable external or environmental costs for OCS leasing in the NAB planning area at \$13 million (p. 84). First, it is unclear how the analysis to determine this cost was conducted. Page 83 does give a general description of the model used (Offshore Environmental Cost Model) to estimate environmental costs. However, no further details are discussed as to what the particular costs were determined to be for the North Aleutian Basin. The

description of the cost model does state that the impacts of ‘typical activities’ and ‘typical OCS oil spills’ are considered in the model (p. 83).

Based on this information, the suggested environmental cost for OCS development in the North Aleutian Basin of \$13 million is extremely low and is not consistent with the potential for OCS operations to negatively impact commercial fisheries and highly sensitive marine habitats.

The loss of commercial fishing grounds, gear damage and losses, potential negative impacts to marketing abilities including effects on price, reduced catches, increased travel time to fishing grounds, and fisheries closures could have dramatic economic impacts that are quantifiable and rise well above \$13 million. Bering Sea/Aleutian Islands groundfish alone is a billion dollar fishery (NMFS, 2004). Even temporary closures to these fisheries as the result of actual or perceived contamination could result in economic losses well over \$13 million.

Furthermore, the Bristol Bay red king crab fishery had a 2005 ex vessel value of \$83 million (ADF&G, 2006a). The 1985 Final EIS for NAB Lease Sale 92 found OCS leasing in the region would result in “major impacts” to this fishery which were defined as “major disruptions to the industry operations,” frequent conflicts that significantly affect the industry and economic losses that exceed 10% (NAB Lease Sale 92 FEIS, 1985). With current values of the red king crab fishery, this would equate to losses greater than \$8.3 million dollars. It is likely that costs would far exceed the low case scenario of 10% economic losses to the fishery, as the Final EIS also predicted “major impacts” to red king crab as a biological resource which were defined as “regional population or species decline in abundance and/or distribution beyond which natural recruitment does not return to its former level within several generations” (*ibid.*) This suggests that crab populations could be significantly reduced to the point where the fishery would be closed, or at least catch levels severely reduced, for a number of years. These “major” impacts could devastate this lucrative, shellfish fishery for many years, resulting in economic losses well over the \$13 million suggested as the quantifiable costs for developing oil and gas in the NAB Planning Area.

To put such a low price on the costs of developing offshore oil and gas in a region so heavily dependent on living marine resources, especially when past MMS studies have predicted significant economic losses to commercial fisheries, indicates a clear error in preparing a 5-year program that balances the factors required under Section 18.

The environmental costs utilized in the Proposed Program should more accurately reflect the potential for these impacts to commercial and subsistence fisheries to result in large economic losses. MMS should then adjust the projected economic benefit for the North Aleutian Basin Planning Area after calculating an environmental cost figure that more accurately reflects the dramatic economic impacts to renewable fisheries resources that could occur under the proposed action.

- **The Proposed Program does not consider the value of fisheries as a renewable resource.**

Section 18(1) directs MMS to prepare a leasing program that considers the renewable value of OCS resources. Nowhere in the Proposed Program or Draft EIS is it apparent that MMS has analyzed long-term values for renewable fisheries resources.

As mentioned above and in AMCC’s Call for Information comments on the 5-Year Program, the combined annual value of Bristol Bay/southeast Bering Sea fisheries reaches into the billions. Bristol Bay wild salmon ecosystems alone were estimated to

have a net present value of \$6.3 to \$10.6 billion dollars (Duffield et al., 2006). Alaska's groundfish fishery, 90% of which comes from the Bering Sea/Aleutian Islands region, is a \$1.5 billion dollar fishery (NMFS, 2004). The 2005 ex vessel value for Bristol Bay red king crab was \$83 million (ADF&G, 2006a). The 2006 ex vessel value for Bristol Bay salmon fisheries was \$94 million (ADF&G, 2006b). Because fisheries are renewable resources, and provide the basis for a sustainable regional economy, their value is tremendous and reaches far beyond the estimated net benefits of anticipated production in the NAB planning area of \$7.7 billion dollars (p. 33). In order to comply with Section 18, MMS needs to recognize the economic importance of these fisheries as renewable resources in preparing the 5-Year Program.

- **The Proposed Program does not consider the impacts of OCS activities on fisheries marketing.**

In order to properly consider renewable OCS resource values as required by Section 18(1) and "other uses of the sea and seabed, including fisheries..." as required by Section 18(2)(C), there must be an analysis of the potential for OCS operations to affect the marketing of seafood products harvested in the region. This analysis is not made in the Proposed Program or DEIS.

Potential or even perceived contamination can have negative impacts on the ability to market fish. This is especially true for seafood products from Alaska, where brand and quality both depend upon the perception and reality that fish are harvested from near-pristine waters.

Bristol Bay has experienced severe price declines for salmon in past years. However, the region is now situated to take significant steps towards increasing the value of salmon harvested in the region. The Bristol Bay sockeye permit holders have formed a regional seafood development association that will work to create a Bristol Bay salmon brand and to find other avenues for increasing the value of Bristol Bay sockeye (see <http://www.bbrsda.com/> for more information). Offshore drilling in the region could harm these efforts, as routine operations or oil spills could lead to the perception that the products were of lower quality and/or that actual contamination of fish and/or their habitats was occurring.

A Section 18 analysis is arbitrary when it does not consider how OCS development could impact fisheries values in a globally important fishing region by negatively affecting the ability to market and increase seafood product value.

- **The Proposed Program does not weigh the oil and gas potential of the NAB planning area against the potential for damage to fish and their habitat.**

We believe Section 18 requires consideration of the relatively small amounts of oil and gas that could potentially be extracted from the NAB with the potential for OCS activities to impact the nation's most important fishing grounds. The anticipated production under the Proposed Program for the NAB is 0.2 billion barrels of oil (BBO) and 5.0 trillion cubic feet of gas (Tcf) (p. 81). This is minor percentage compared to oil and gas resources in other planning areas of the U.S., especially the Gulf of Mexico.

However, in no other place in the United States does there exist such a density and diversity of commercially harvested species. The Bering Sea is unique in the value of and abundance of seafood products that it produces. Over 20 fish species that support this vital economic sector have essential habitat within the area proposed for leasing (NMFS, 2006). Many of the species (red king crab, sockeye salmon, Pacific cod, etc.)

utilize the region proposed for leasing for a number of life stages, greatly increasing the potential for routine operations and accidents to affect populations.

As mentioned above, some of these impacts are presented in the 1985 Final EIS for NAB Lease Sale 92. The Final EIS predicted “major impacts” to Bristol Bay red king crab, Alaska’s most valuable shellfish species. An offshore oil spill during a time when juvenile or adult salmon were migrating through the Lease Sale 92 area could have population-level impacts and could close the entire Bristol Bay sockeye fishery for a season or more. Such a closure would have widespread economic, social, and cultural impacts within the Bristol Bay region and beyond. Many Bristol Bay sockeye permit holders live outside of the state of Alaska, many in Washington and Oregon. Economic impacts to this fishery would therefore resound far beyond the Bering Sea region, to these states and communities within them.

Furthermore, as the Draft EIS for the Proposed Program describes, impacts to Alaska Native peoples in the region would be disproportionately high due to their dependence on subsistence foods. We appreciate this acknowledgement and believe this is also the case for many of the commercial fishermen and commercial fishing families that rely upon the continued health of the living marine resources in the region to sustain their livelihoods. Furthermore, in many cases, local residents are both subsistence and commercial harvesters, as part of both cultural traditions and today’s cash economy.

The magnitude of the resources at stake, as well as the social, economic, and cultural importance of Bristol Bay and southeast Bering Sea fisheries, should be weighed alongside the small oil and gas potential of the region. MMS even acknowledges in the Draft EIS under its comparison of impacts for Alternative 2 that the amount of oil and gas in the region is small, and would not have substantial effects on domestic availability of oil and gas (DEIS, IV-317). In summary: the small potential for oil and gas development would not have significant effects on domestic oil and gas production. However, the high potential for negative impacts to Alaska’s economically, socially, and culturally important fisheries - which are significant at national and global levels - is not even taken into account. This clear imbalance needs to be addressed by MMS and the Secretary under the Section 18 analysis.

Together, these points illustrate that MMS and the Secretary have not made a good faith effort to consider the value, importance, or potential impacts to the fisheries of Bristol Bay and the southeast Bering Sea as required by Section 18. An accurate assessment of what is at stake economically, ecologically, and socially would likely lead the Secretary to not include Bristol Bay in the 5-Year Program.

❖ Part 2: MMS Should Reexamine the State of Alaska’s Position on OCS Leasing in Bristol Bay as well as the Positions of Potentially Affected Entities

The Proposed Program relies heavily upon the support of Alaska Governor Frank Murkowski and the purported overwhelming support from local government and tribal organizations to justify inclusion of the North Aleutian Basin in the program. We request that MMS further examine these conditions that are cited as the basis for including the NAB planning area in the program. We make this request based upon (1) Alaska’s Governor-elect, Sarah Palin, has not yet developed a position on OCS development in the North Aleutian Basin and (2) upon reexamination, MMS should find that there is not a majority of local governments, villages, tribal organizations, and fishing interests in support of OCS leasing in the region.

The local governments, tribes, and village councils that have recently voiced support over leasing in the Bristol Bay region largely fall within the Aleutians East Borough

region. Aleutians East entities have made it very clear in their resolutions and comments that their support is based upon MMS and industry being able to meet a number of conditions. These conditions include:

- Maximum protection for fisheries resources;
- Exploration and development that is conducted in an environmentally safe manner;
- Lease stipulations requiring oil and gas companies to provide employment and business opportunities to local residents;
- Leasing occurs only in the Lease Sale 92 area; and
- Federal funding that is made available to:
 - Study the effective protection of local fishery resources and environment;
 - Create economic opportunities for residents;
 - Allow local residents to participate effectively in the EIS and Lease Sale; process, including travel and consultancies.

These entities have also made it clear that they reserve the right to withdraw support if these conditions are not met. The two conditions relating to development that is environmentally safe and protects fisheries are guarantees that industry and MMS simply cannot make, particularly in an area like the Bering Sea that provides enormous engineering and operational challenges. There is also abundant experience that human error is cannot be effectively prevented, even in state of the art facilities such as Alaska's North Slope oil fields.

Furthermore, the Governor's submission (as detailed on p.106) included submissions from a number of entities that were intended to demonstrate the 'overwhelming support' for OCS leasing in the NAB planning area region. This submission, however, fails to include the numerous village and tribal councils from the Bristol Bay region and across Western Alaska that have passed resolutions and/or written comments in opposition to OCS leasing in Bristol Bay. We are including copies of these statements of opposition with our comments. Villages, tribal councils, local governments, and other community entities that have submitted comments or written resolutions opposed to OCS leasing in Bristol Bay (or in support of onshore oil and gas development only)include:

- Akiak Native Community
- Alaska Independent Fishermen's Marketing Association
- Alaska Intertribal Council
- Bering Sea Fishermen's Association
- Bristol Bay Coastal Resource Service Area
- Bristol Bay Economic Development Corporation
- Bristol Bay Native Association
- Chevak Native Village
- City of Dillingham
- City of Nondalton
- City of Pilot Point
- Chignik Lake Village
- Curyung Tribal Council
- Egegik Tribal Council
- Igiugig Tribal Council
- Kongiganak Traditional Council
- Kotlik Tribal Council
- Levelock Village Council
- Manokotak Village Council

- Naknek Native Village
- Native Village of Ekuk
- Native Village of Goodnews Bay
- Native Village of Nunam Iqua
- Native Village of Nunapitchuk
- Ohogamiut Traditional Council
- Paug-Vik, Inc.
- Pilot Point Traditional Council
- Platinum Traditional Council
- Port Heiden Native Village
- Twin Hills Native Village
- Ugashik Traditional Council
- Yupiit of Andreefski
- Yukon River Drainage Fishermen's Association

These interests span across the Bristol Bay region and western Alaska, and include tribes, villages, fishing, and community interests that could be affected by offshore leasing in the North Aleutian Basin. OCSLA directs MMS to consider local government, village, and Tribal positions. The picture of overwhelming local support painted by the soon-to-be former Governor and echoed by MMS is not an accurate representation of the sentiment of local people and communities regarding offshore oil and gas development. The Proposed Program should reflect the interests, concerns, and positions of stakeholders equitably.

❖ **Conclusion**

As evidenced in the Proposed 5- Year Program for 2007-2012 and the accompanying Draft EIS, MMS and the Secretary have not made a good faith effort to consider:

- (1) The economic, social, and cultural importance of commercial fisheries that take place within Bristol Bay and the southeast Bering Sea region;
- (2) The potential economic and environmental costs to commercial fisheries as a result of OCS development;
- (3) The value of commercial fisheries as renewable resources; and
- (4) The potential for OCS development to affect the ability to market and increase the value of seafood products from the region, especially Bristol Bay sockeye salmon.

A good faith effort to consider Section 18 factors would result in a much more accurate and informed discussion of the resources of the Bristol Bay region and the potential for OCS development to seriously affect the viability of the resources, livelihoods, values, and industries they sustain. MMS should remove Bristol Bay from the Proposed Program on the basis of the arbitrary and wholly inadequate nature of the Section 18 OCSLA analysis conducted for the North Aleutian Basin planning area.

Furthermore, citing Governor Murkowski's request as the primary reason for including the North Aleutian Basin Planning Area in the 5-Year Program warrants reconsideration. Alaska will have a new Governor starting Dec. 4 who should be consulted in this important matter. Governor Murkowski's submission does not recognize opposition to drilling amongst communities and fishing interests throughout the region, and he limited his review to the entities that support development and ignored contrary views.

In closing, there is no compelling need to develop oil and gas resources in sensitive areas of our ocean's such as Bristol Bay. As the Department of Interior has pointed out, **more than 80% of the nation's undiscovered OCS gas is located in areas already available to the industry for exploration** (MMS, 2004). In addition, huge discoveries of natural gas at Prudhoe Bay, which far outweigh the comparatively small geologic potential in Bristol Bay, remain untapped.

Furthermore, it is estimated that by providing tax incentives to promote the construction of energy-efficient buildings and to stimulate the manufacture of energy-efficient heating equipment, the U.S. could save more than 300 trillion cubic feet of natural gas over 50 years- 44 times more than is estimated to be conventionally recoverable from Bristol Bay (NRDC, 2001). AMCC and WWF support energy strategies which focus on conservation, efficiency, and aggressive application of renewable energy technologies. We believe that such policies are better suited to increase our nation's energy security than are those that would open sensitive areas like Bristol Bay to offshore oil and gas development.

Again, we thank you for this opportunity to represent the interests and values of our members, a constituency of the U.S. public, who have a vested interest and rightful voice in decisions affecting the nation's Outer Continental Shelf.

Sources:

Alaska Department of Fish and Game (2006a) *2005 Preliminary Alaska Commercial Shellfish Catches & Estimated Exvessel Values*. Accessed November 10, 2006 at: <http://www.cf.adfg.state.ak.us/geninfo/shellfish/05value.php> .

Alaska Department of Fish and Game (2006b). *Bristol Bay Salmon 2006 Season Summary*. Accessed November 10, 2006 at: <http://www.cf.adfg.state.ak.us/region2/finfish/salmon/bbay/brbpos06.pdf> .

Duffield, J., D. Patterson , C. Neher, and O.S. Goldsmith (July 2006) *Economics of Wild Salmon Watersheds: Bristol Bay, Alaska*. Report Prepared for Trout Unlimited.

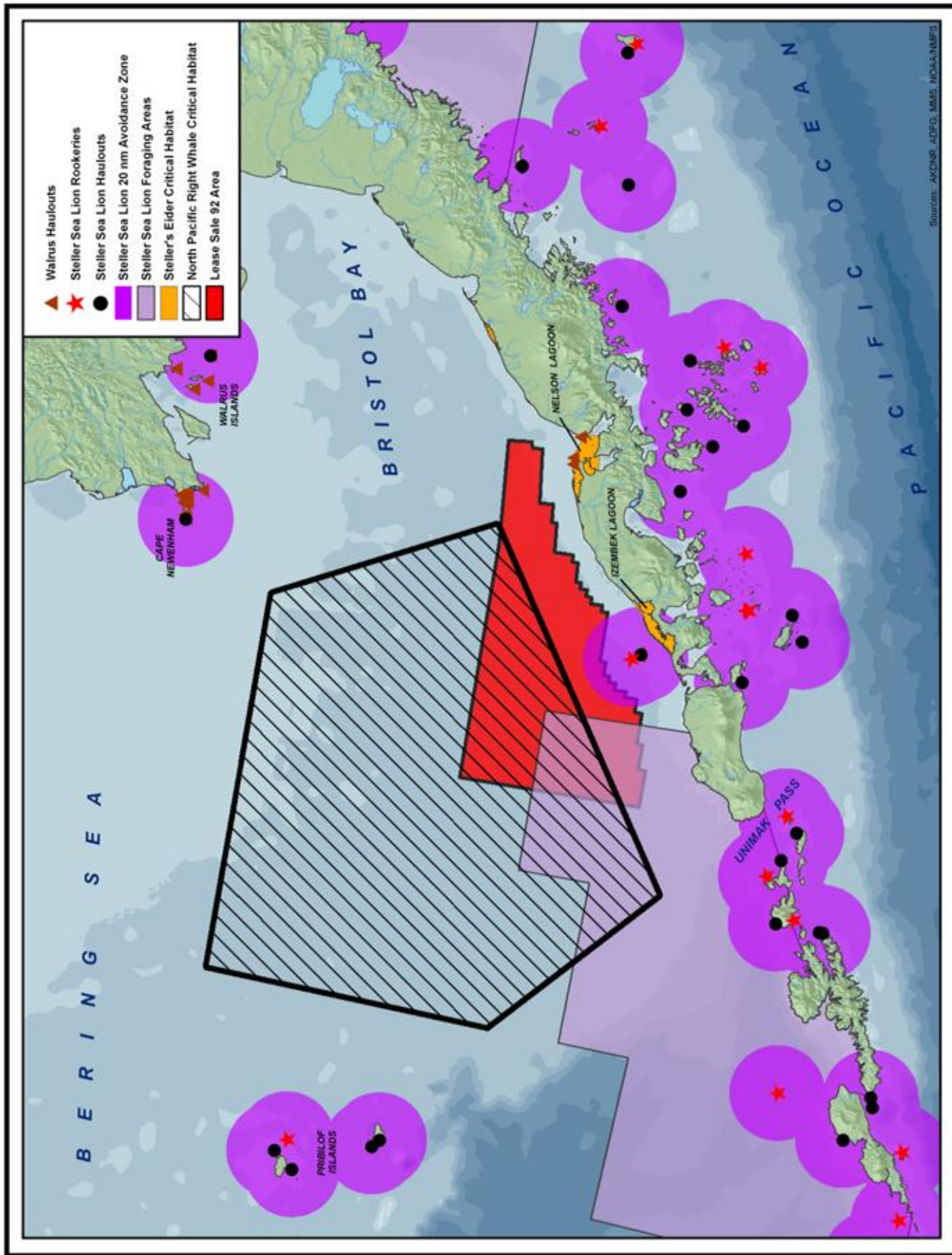
Minerals Management Service (2004). Outer Continental Shelf Petroleum Assessment, 2003 Update.

National Marine Fisheries Service (2006) *Comments Submitted on the Draft Proposed Outer Continental Shelf Oil and Gas Leasing Program*.

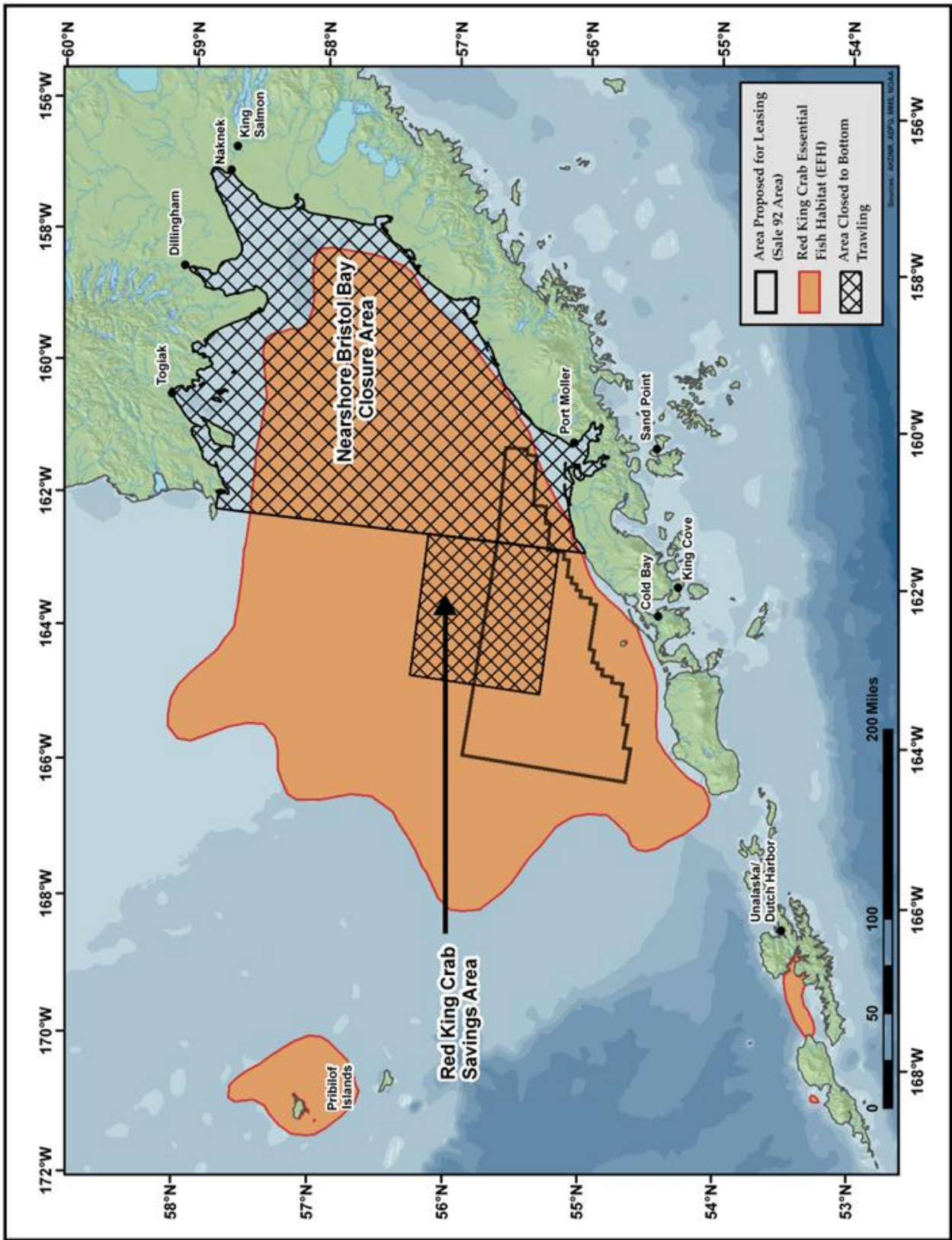
National Marine Fisheries Service. Hiatt, T., Felthoven, R., Seung, C. & Terry, J. (2004) *Stock Assessment and Fishery Evaluation Report for the Groundfish Fisheries of the Gulf of Alaska And Bering Sea/Aleutian Island Area: Economic Status of the Groundfish Fisheries Off Alaska, 2003*.

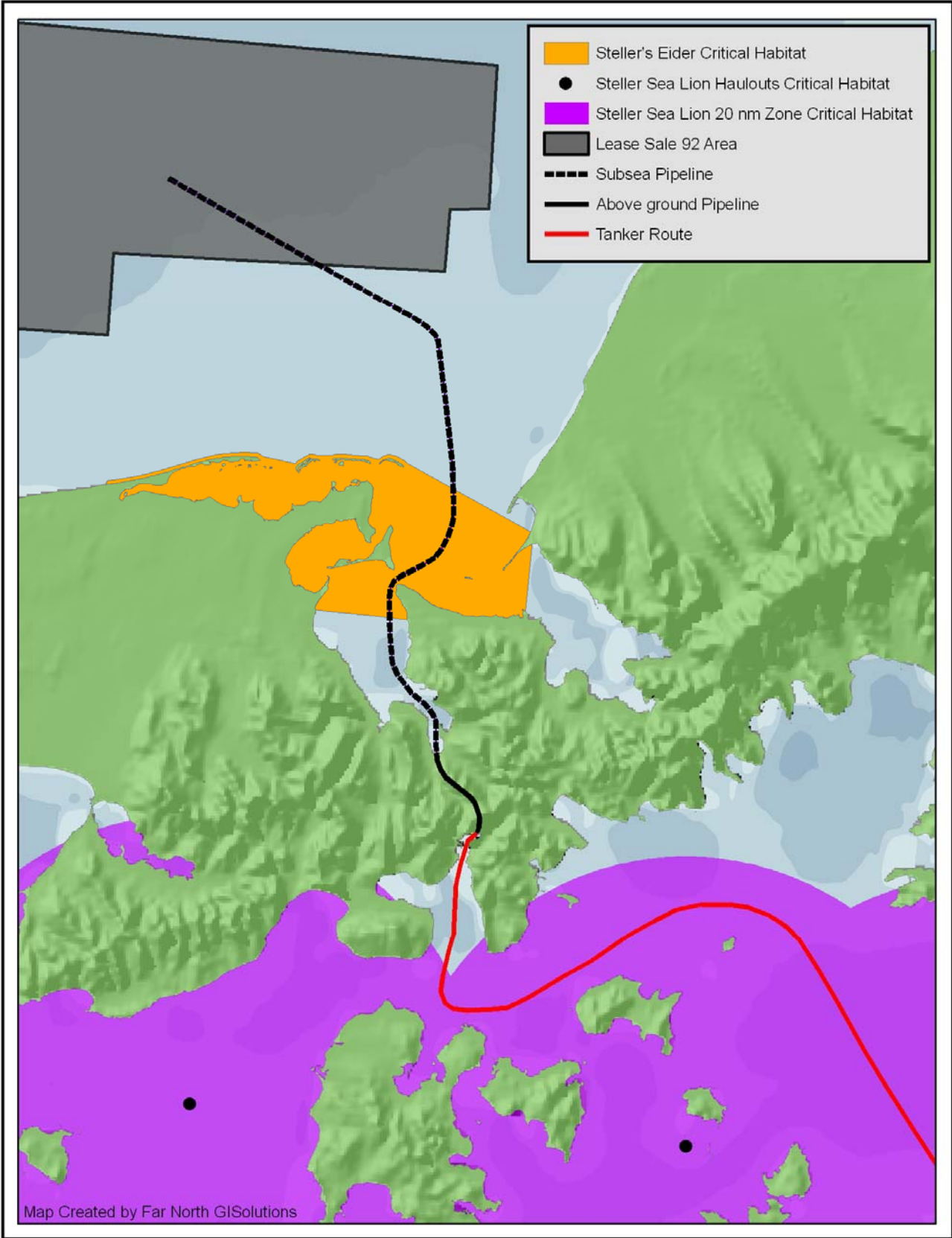
Natural Resources Defense Council (2001) *A Responsible Energy Policy for the 21st Century*, p. 32.

Maps created for the Alaska Marine Conservation Council

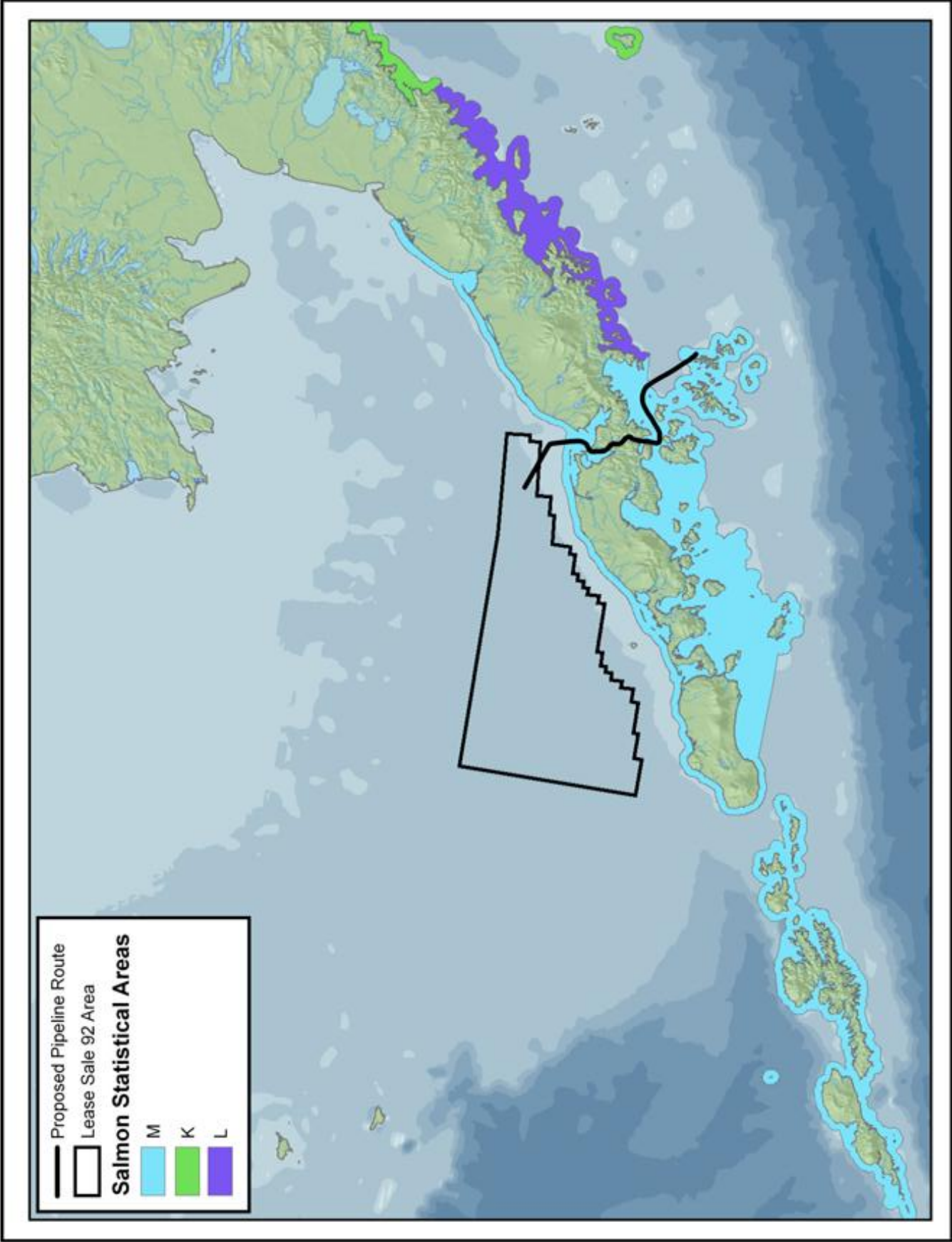


The area proposed for leasing falls within designated Essential Fish Habitat (EFH) for red king crab and overlaps two areas closed to trawling to protect juvenile crab habitat.

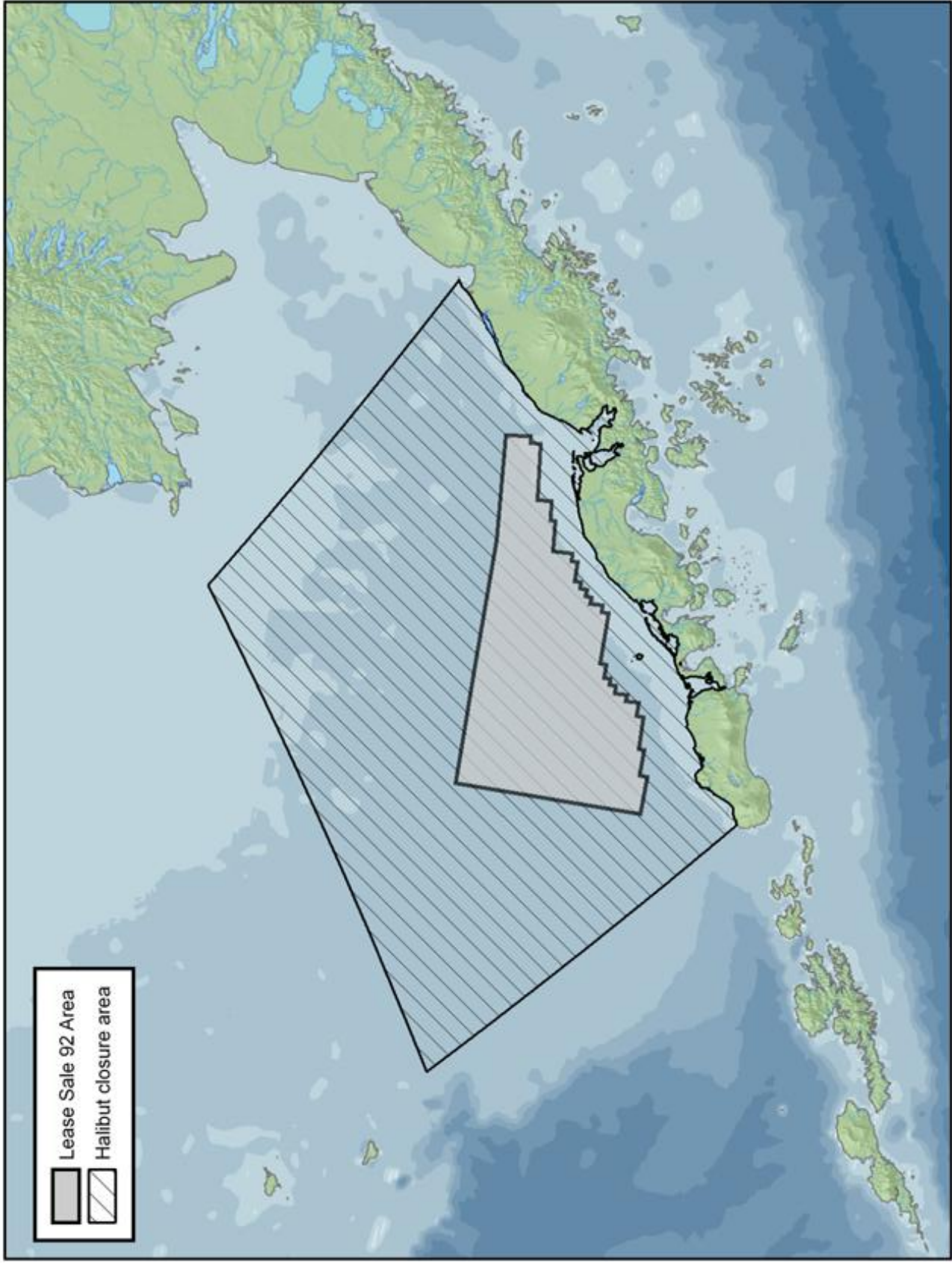




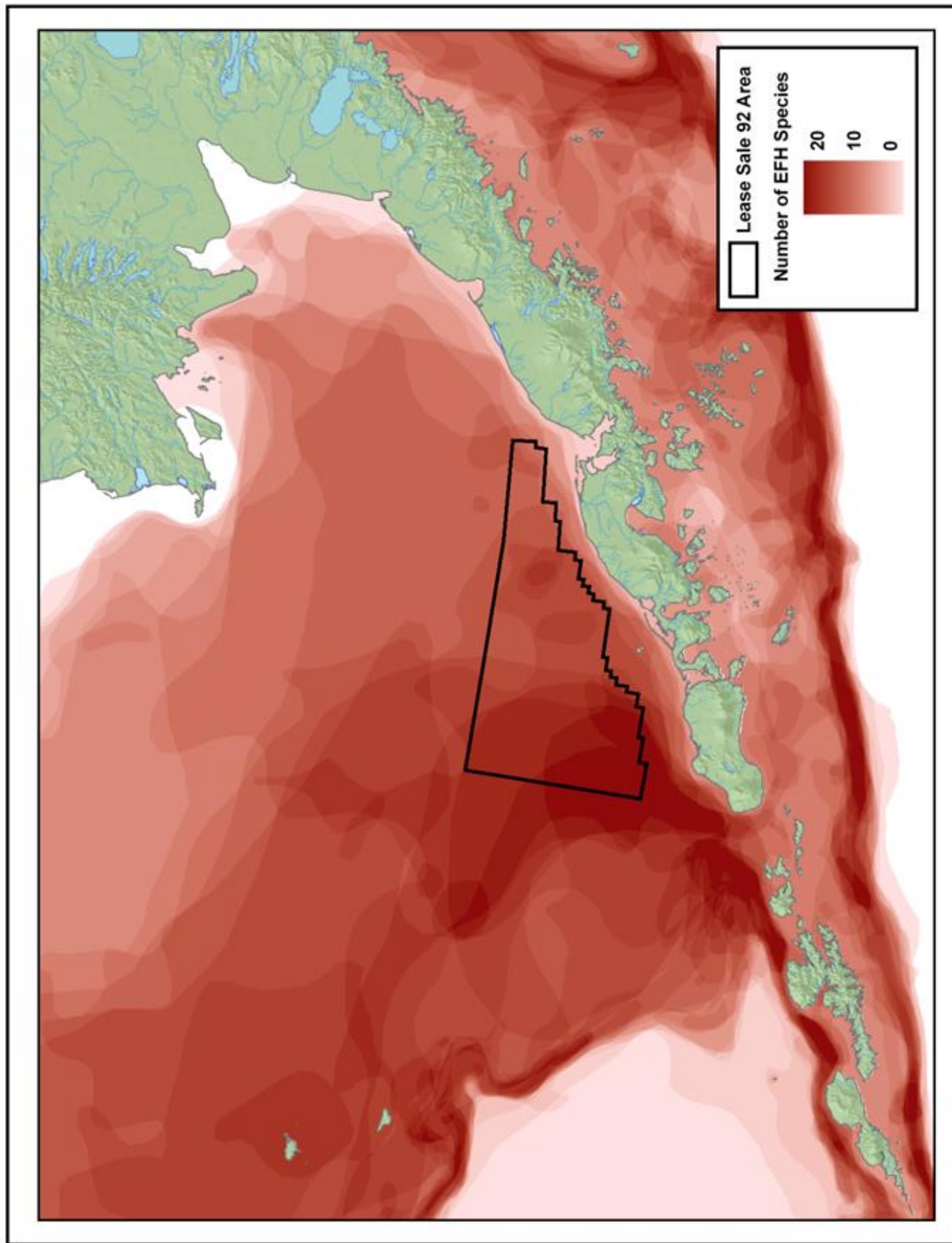
The proposed pipeline route for offshore oil and gas development in the North Aleutian Basin would run through the Area M salmon fishery. The proposed tanker route would run through Area M on the southside of the Alaska Peninsula.



The area proposed for leasing falls within recognized nursery habitat for Pacific halibut. The hatched area has been closed to halibut fishing by the International Pacific Halibut Commission (IPHC) to protect the species during critical life stages.



The area proposed for leasing has been identified by NMFS as providing Essential Fish Habitat (EFH) for more than 20 species.



The area proposed for leasing is within the "ring of fire" - one of the most seismically and volcanically active areas in the world.

