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June 26, 2007

To: **Mr. Jim Costa, California, Chairman**
Subcommittee on Energy and Mineral Resources
1626 Longworth House Office Building
(202) 225-9297 Fax: (202) 225-5255

From: **Kelly Harrell, Friends of Bristol Bay Project Director**
Alaska Marine Conservation Council
P.O. Box 101145
Anchorage, AK 99510

Re: Oversight Hearing on "The Minerals Management Service's Proposed 2007-2012 Program for Oil and Gas Leasing on the Outer Continental Shelf"

Dear Chairman Costa,

The Alaska Marine Conservation Council (AMCC) appreciates this opportunity to provide written testimony for the House Natural Resources Committee hearing on the Minerals Management Service's 5-Year Outer Continental Shelf (OCS) Leasing Program for 2007-2012. On behalf of our board and over 700 members who include commercial fishermen, subsistence harvesters and others whose livelihoods depend on healthy marine ecosystems, we thank you for holding a hearing on proposed OCS leasing in Alaska, a topic very important to Alaska's coastal communities and fishing industry.

AMCC is opposed to the inclusion of Bristol Bay and the southeastern Bering Sea (known as the North Aleutian Basin Planning Area) in the 2007-2012 OCS Leasing Program. This area, often referred to as the nation's 'fish basket,' has a long-history of bipartisan protection stretching back to the *Exxon Valdez* oil spill in 1989. This past January, President Bush lifted the executive ban on leasing in Bristol Bay, ending the legacy of protection for this rich and valuable marine ecosystem. The President took this action despite pleas not to do so from a diverse array of interests including commercial fishing organizations, Alaska Native Tribes and villages, and conservation groups (see attached letter). These groups stand united in their position that **the potential benefits of offshore oil and gas drilling in Bristol Bay are not worth the great economic, ecological, and cultural risks.**

In this 5-year OCS program, MMS has scheduled a lease sale for in 2011 in a 5.6 million acre block of the North Aleutian Basin Planning Area that lies at the center of **the most important region for the commercial fishing industry in Alaska and the nation.** More than 40% of our nation's total seafood harvest comes from the Bering Sea¹ and the renewable fisheries resources potentially impacted by offshore drilling are worth more than \$2 billion annually (see attachment). The area proposed for leasing overlaps fishing grounds and/or habitat for the world's largest sockeye (red) salmon fishery, the globally-important Bering Sea groundfish fishery, the famous Bristol Bay red king crab fishery, and high-valued Pacific halibut fishery. These fisheries resources are the economic and cultural foundation of the region's coastal communities and provide jobs for fishermen and fishing families throughout Alaska and the

¹ NOAA Fisheries. *Fisheries of the United States 2005*. February 2007. Accessible online at: <http://www.st.nmfs.gov/st1/fus/fus05/index.html> .

Pacific Northwest. Any impacts to these renewable fisheries resources would directly affect the vitality of the fishing industry here as well as the nation's supply and exports of seafood products. Furthermore, as fisheries continue to collapse and are overfished within the nation and around the world, the fisheries in the Bering Sea continue to stand as a model for successful and sustainable management of fisheries resources. Offshore drilling would compromise these accomplishments and Alaska's reputation as a leader in fisheries management.

The risk from oil spills is extremely high in the Bering Sea region known for its powerful storms and high frequency of volcanic and seismic activity. **MMS predicts at least one large oil spill and numerous smaller spills will occur if offshore drilling takes place.**² Cleanup capabilities in rough weather and sea ice, which extends south into the North Aleutian Basin Planning Area in the winter months, are simply nonexistent. Even small spills have the potential to cause ecological harm to marine resources and could result in fisheries closures if there is the slightest perception that fish resources were affected. Also, due to the utilization of shallow shelf areas and adjacent coastal habitats by sensitive life forms of fish and crab, and by such species at various life stages (see attached maps), the potential for a pollution event to cause population-level impacts to an economically important fishery is high. For example, sockeye salmon utilize habitats within and surrounding the proposed lease sale area as outmigration routes as smolts, as juvenile feeding grounds, and as adult migration routes. This species, which supports a fishery worth nearly \$100 million in 2006 (see attachment), would therefore be vulnerable to an oil spill throughout a number of important life stages.

The southeastern Bering Sea is a remote region only accessible by air and by boat. Industrial development is non-existent here with the exception of fishing-related activities. In addition to rich fisheries resources, the region also supports around 25 species of marine mammals including the world's most endangered whale- the North Pacific right whale. The area proposed for leasing substantially overlaps designated critical habitat for this species on the brink of extinction (see attached map). The southeastern Bering Sea is also a haven for migratory seabirds and waterfowl and contains the greatest concentration of seabird colonies on Earth. **The continental shelf of the Bering Sea is truly one of the most productive in the world and contains species and habitats that are ecologically important on a global scale.** This 'wet wilderness' is a crown ocean jewel that our nation should take pride in and nurture; not put at risk for the short-term development of relatively small amount of fossil fuel resources.

OCS development in Bristol Bay would dramatically alter the pristine character of this awe-inspiring region that is home to five National Wildlife Refuges and eight state protected areas. The development scenario below for the North Aleutian Basin Planning Area laid out by MMS in the 5-Year Program Final Environmental Impact Statement (EIS) paints a vivid picture of the industrial-scale of activity that could be expected if leasing occurs:

- 4-6 offshore platforms
- up to 20 exploration wells
- up to 200 production wells
- up to 150 miles of offshore pipeline— gas pipeline and condensate/light crude oil pipeline (impacting up to 555 acres of benthic habitat)
- up to 50 miles of new onshore pipeline
- 2 pipeline landfalls
- 1 waste facility
- 1 processing facility

² Minerals Management Service. *Final Environmental Impact Statement, Outer Continental Shelf Leasing Program 2007-2012*. April 2007. Accessible online at: http://www.mms.gov/5-year/2007-2012_FEIS.htm .

- 1 shore base and a new dock or causeway for service vessels in onshore areas along the coast of the Alaska Peninsula, Unimak Island, or north of the Bristol Bay coast
- 1 or more new access roads may be needed for each new facility and for pipeline maintenance activities.³

This network of facilities, support bases, and oil and gas transportation infrastructure would impact hundreds of miles of habitat for fish, marine mammals, seabirds, waterfowl, and terrestrial mammals stretching from the seafloor and water column in the Bering Sea to coastal and inland areas along the north and south side of the Alaska Peninsula. Beyond oil spills and the sprawling footprint of infrastructure, the impacts from seismic surveys, and the discharge of drilling muds and cuttings pose additional risks to the fisheries resources and rich marine life in Bristol Bay and the southeastern Bering Sea. Given what's at stake in the region, the potential impacts of these activities are unacceptable.

The ecological, economic, and cultural risks from offshore drilling in Bristol Bay are extremely high but the potential benefits are minimal. MMS estimates the net economic value of developing oil and gas resources in the North Aleutian Basin at \$7.7 billion dollars over the entire 25-40 year lifespan of the project.⁴ This figure pales in comparison to the \$2 billion dollar annual renewable fisheries economy that offshore drilling would put at risk each year.

The mean estimated technically recoverable resources for the North Aleutian Basin Planning Area are 8.62 trillion cubic feet of gas and 0.75 billion barrels of oil.⁵ This represents less than 1% of the total mean estimated technically recoverable oil in the U.S. OCS (85.88 Bbo) and around 2% of gas (419.88 Tcf).⁶ Clearly, by protecting Bristol Bay, we would not be cutting off access to our nation's ocean energy resources, most of which are already open to exploration and development in the Gulf of Mexico. The relatively small amounts of oil and gas in Bristol Bay would do little to end our nation's reliance on foreign fossil fuels. MMS states in the Final Environmental Impact Statement for the 5-Year Program that, "Most benefits (of the 5-Year Program) would be short-term and would delay the increase in the Nation's dependency on oil imports."⁷ **It is simply not good energy policy, economic policy, or fisheries policy to allow offshore leasing amidst the productive waters of Bristol Bay and the southeastern Bering Sea.**

AMCC urges members of Congress to request that MMS remove Bristol Bay from the 5-Year OCS Leasing Program and strongly hopes that members will work to restore protection for this unparalleled and extremely valuable marine ecosystem. We encourage other members of Congress to support and cosponsor the Bristol Bay Protection Act (HR 1957) introduced by Representatives Inslee, Hinchey, and Gilchrest (see attached letter). This bill would provide permanent protection for the Bering Sea's renewable fisheries economy, the region's coastal communities, as well as the globally important marine wildlife in the region from the potentially devastating impacts of offshore oil and gas development.

³ Minerals Management Service. *Final Environmental Impact Statement, Outer Continental Shelf Leasing Program 2007-2012*. April 2007. Page IV-153; IV-136 Accessible online at: http://www.mms.gov/5-year/2007-2012_FEIS.htm .

⁴ Minerals Management Service. *Final Proposed Leasing Outer Continental Shelf Leasing Program 2007-2012*.

⁵ Minerals Management Service. *Planning Area Resources Addendum to Assessment of Undiscovered Technically Recoverable Resources of the Nation's Outer Continental Shelf*, 2006.

⁶ *Ibid.*

⁷ Minerals Management Service. *Final Environmental Impact Statement, Outer Continental Shelf Leasing Program 2007-2012*. April 2007. Page IV-522. Accessible online at: http://www.mms.gov/5-year/2007-2012_FEIS.htm .

Again, thank you for this opportunity to comment. Please feel free to contact me with any questions or concerns.

Sincerely,

Kelly Harrell
Project Director, Friends of Bristol Bay

Enclosures



Alaskans Urge Congress to Support HR 1957 & S 1311- the Bristol Bay Protection Act

The Alaska Marine Conservation Council (AMCC), an Alaska-based organization whose more than 700 members include commercial fishermen, subsistence harvesters, and others whose livelihoods depend on healthy marine ecosystems, supports the Bristol Bay Protection Act introduced in the House by Representatives Inslee (D-WA), Gilchrest (R-MD), and Hinchey (D-NY) and the companion bill introduced in the Senate by John Kerry (D-MA). The Alaska Marine Conservation Council urges other members of Congress to co-sponsor these important bills.

AMCC has been working closely with communities and fishing interests to protect Bristol Bay from offshore drilling for over four years. **More than 40 local and regional entities including fishing associations, Tribes, villages and other Native organizations have voiced opposition to offshore oil and gas drilling in Bristol Bay.** The livelihoods of local residents, as well as commercial fishermen and subsistence harvesters, are directly tied to the health of the renewable marine resources in this region. These living, marine resources would be put at great risk from offshore oil and gas development. **The federal government's own studies predict drilling in Bristol Bay and the southeastern Bering Sea (North Aleutian Basin Planning Area) would lead to at least one large oil spill, 2 medium-sized spills, and numerous smaller spills.**⁸

By all accounts, Bristol Bay is one of the nation's crown ocean jewels. The bay is a large estuary of the Bering Sea and its broad, shallow continental shelf is one of the most productive in the world. **Approximately 40% of the entire U.S. seafood catch comes from the Bering Sea, including the world's largest sockeye (red) salmon fishery, globally-important Bering Sea pollock, and Bristol Bay red king crab.**⁹ The largest concentration of seabird colonies in North America occurs here. Numerous marine mammal species have important habitat in Bristol Bay- including threatened and endangered species such as the Northern fur seal, Steller sea lion, southwestern sea otter, fin whale, humpback whale, and the extremely imperiled North Pacific right whale.

Bristol Bay has a long history of bipartisan protection from OCS leasing that dates back to the Exxon Valdez oil spill in 1989. In January 2007, President Bush lifted a long-standing executive ban on offshore drilling in Bristol Bay removing the last layer of protection for the region.

The Final 5-Year OCS Leasing Program recently transmitted to Congress for a 60-day review period proposes to hold a lease sale in Bristol Bay (North Aleutian Basin Planning Area) in 2011. **Congress must act to protect Bristol Bay's ecologically, economically, and culturally important renewable resources from the short-term development of fossil fuels.**

By supporting the Bristol Bay Protection Act, you would be:

- Supporting the continued economic development of renewable fisheries resources of the southeastern Bering Sea that are worth more than \$2 billion annually and are vital to local and state economies in Alaska and the Pacific Northwest (see attachment);

⁸ Minerals Management Service. *Final Environmental Impact Statement, Outer Continental Shelf Leasing Program 2007-2012*. April 2007. Accessible online at: http://www.mms.gov/5-year/2007-2012_FEIS.htm .

⁹ NOAA Fisheries. *Fisheries of the United States 2005*. February 2007. Accessible online at: <http://www.st.nmfs.gov/st1/fus/fus05/index.html> .

- Supporting sound economic policy that refuses to risk this fisheries economy for an estimated \$7.7 billion dollar net economic value over the entire 25-40 year lifespan of fossil fuel development in Bristol Bay;
- Helping to protect the jobs of fishermen who have nothing to gain and everything to lose from proposed offshore oil and gas development;
- Ensuring that the four National Wildlife Refuges and eight Alaska state protected areas in the region are not subject to degradation from oil and gas activities and can continue to provide vital habitat to a range of seabird, waterfowl, marine mammal, and terrestrial species;
- Supporting an enlightened vision for our nation's energy policy that refuses to risk economically, ecologically, and culturally important renewable resources for short-term fossil fuel development that would benefit few and could be detrimental to many.

Your support of the Bristol Bay Protection Act will help to safeguard globally important commercial fisheries, diverse marine life, and the economies and traditions that depend on their long term health. Please feel free to contact us for more information or with any questions or concerns.

Sincerely,

Kelly Harrell
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Alaska Marine Conservation Council

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