



Public Employees for Environmental Responsibility

2000 P Street, NW, Suite 240 • Washington, DC 20036

Phone: (202) 265-PEER • Fax: (202) 265-4192

Email: info@peer.org • Web: <http://www.peer.org>

November 16, 2015

Neesha Stellrecht
U.S. Fish and Wildlife Service
101 12th Avenue, Room 110
Fairbanks, AK 99701

Re.: **Comments on Draft Environmental Assessment for the Reintroduction of Steller's Eiders to the Yukon-Kuskokwim Delta, Alaska.**

On behalf of Public Employees for Environmental Responsibility (PEER), we are writing to provide comments on the draft Environmental Assessment for the Reintroduction of Steller's Eiders to the Yukon-Kuskokwim Delta, Alaska. We would like to draw the U.S. Fish and Wildlife Service's ("Service") attention to several concerns, including concerns related to –

- Undisclosed costs and uncertain duration;
- Insufficient consideration of climate change in site selection; and
- Failure to give due weight to risks increasing the likelihood of reintroduction failure.

I. Compliance with the National Environmental Policy Act (NEPA)

Even to a cursory reader, the subject draft Environmental Assessment (draft EA) clearly reads as if it is a justification for a decision already concluded. While the preferred alternative it may have been discussed internally within the Service, the draft EA appears crafted to convey that further debate in the public comment arena is redundant or superfluous (see Matz et al. 2008). Such an approach preempts the letter and intent of NEPA for public scoping and limits the opportunity to explore a full range of alternatives that might otherwise not occur.

This pre-decisional factor is more pertinent given the magnitude of the potential taxpayer investment and duration of the proposed reintroduction effort. The poorly crafted narrative, misrepresentation of data (including the cavalier manner in which the potential duration of the project is presented as "several years") demonstrates a flagrant disregard for agency compliance with NEPA. Additionally, there are Service activities ongoing that may be interpreted as within

the scope of the proposed reintroduction, thereby fragmenting the NEPA process rather than integrate the requirements of NEPA with other planning.¹

II. Costs

With the understanding that the Anti-Deficiency Act precludes the federal commitment of funds outside the normal budgeting process, the draft EA fails to indicate the potential maximum projected costs of the reintroduction effort of \$45 million, over the course of 30 years for a stated goal of 50 breeding hens. In a highly optimistic scenario, if reintroduction is fully successful this amounts to a minimum of \$900,000 per breeding hen. However, a more realistic and probable scenario is far less than 50 breeding hens, which would increase the cost per hen to an even steeper sum.

III. Reintroduction Timeline

The draft EA describes the reintroduction as occurring over “several years.” However, the proposed reintroduction may well span approximately 30 years. This simple discrepancy undermines the credibility of the agency presentation for the proposed reintroduction. Further, it raises the question of what other facts may have been conveniently distorted or overlooked. Given the rate of climate change in the Arctic and subarctic regions, trivialization of such developments minimizes the expected effects of sea level rise, saltwater intrusions, shoreline erosion, permafrost thawing and vegetation shifts. None of these factors are adequately addressed in the draft EA.

IV. Consideration of Reintroduction Logistics

While it is understandable that some site-specific data is sensitive and cannot be disclosed, there should be more detail in the draft EA regarding brood stock, such as

- What surrogate species, source of brood stock replacements and turnover rates for the duration of the project;
- What are the plans for disposal of non-productive hens or unviable eggs;
- How predator control will be dealt with;
- What measures will be used to mitigate effects of climate change;
- What threshold or parameters will be used to determine whether the reintroduction is to be deemed infeasible?

These are among many other details inferred or missing. Until they are filled in, the actual prospects for successful reestablishment of a breeding population in the Yukon-Kuskokwim Delta will remain hopelessly clouded.

a. Lack of Details for Decision Making²

¹ § 1500.2(c).

Unknowns abound in the draft EA, not only from the lack of details, but from the failure to acknowledgement them at all. For example, there is little discussion regarding the cause for the original breeding population to decline or abandon this site. Are those factors still present and if so, how will these affect the successful outcome of the reintroduction effort over the duration of the effort?

Other examples of unaddressed but highly relevant factors in the draft EA include –

- What is the contribution of this subpopulation to the overall population, historically or projected?
- With a cadre of investigators in the field to monitor reintroduction efforts, will this attract predators or create trails leading to surrogate nesting sites?
- As the primary reintroduction site in the Yukon-Kuskokwim Delta, 60°N latitude, is the general demarcation between continuous and discontinuous permafrost, how will the loss of permafrost affect surface vegetation and saltwater intrusion over the duration of the effort.

While the draft EA does discuss climate change, it only does so in terms of climate change's unpredictability. In response to the threat of climate change at the reintroduction site, the Service states that it will simply use "adaptive management strategies to respond to possible environmental changes caused by climate change." No further details are provided.

The draft EA indicates that the Service has failed to adequately factor in climate change. This is problematic because climate change could significantly alter the suitability of the site selected and therefore render the reintroduction futile and a waste of enormous sums of federal funds.

The draft EA recognizes Izembek National Wildlife Refuge as a potential reintroduction site but provides no parameters for using this site concurrently or in lieu of the primary site at Yukon-Kuskokwim Delta.

b. *Predator Management*

The draft EA is vague regarding predator management and provides no details on this highly controversial management action. The draft EA merely identifies the types of likely predators and states that the Service may use predator management efforts at release sites such as fencing and/or mammalian trapping. If this matter is not addressed in this draft EA, will another NEPA compliance address pertinent details prior to implementing predator control activities?

V. Uncertainty and Risk

² § 1502.22.

At the end of the day, enormous sums would be spent with equally great risks – not only for the Steller’s Eider, but also the Service’s credibility with the taxpaying public. Even if the effort is successful, neither the draft EA nor any technical document associated with the recovery plan estimates the total contribution of the reintroduced population to overall species recovery.

It should also be noted that village elders oppose the reintroduction effort because they do not want the increased presence of law enforcement in their community that this reintroduction would bring. However, others support the reintroduction because of the revenue that the effort would bring to the local economy.

VI. Conclusion

PEER appreciates the opportunity to comment on the draft EA for the Reintroduction of Steller’s Eiders to the Yukon-Kuskokwim Delta, Alaska, as well as the Service’s consideration of the issues raised.

Sincerely,

Jeff Ruch
Executive Director