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Roger Sayre, Planning and Environmental Coordinator
Arctic Field Office
Bureau of Land Management
1150 University Avenue
Fairbanks, AK 99709

Subject: Colville River Special Area Management Plan

Dear Mr. Sayre:

This letter transmits the Raptor Research Foundation's (RRF) comments on the Bureau of Land Management's (BLM) proposed Colville River Special Area (CRSA) Management Plan (Plan). RRF is a non-profit organization comprised of approximately 900 members who are predominantly scientists who study and help manage birds of prey and their habitats. RRF was founded in 1966 and has published the scientific journal, *The Journal of Raptor Research* since that time, as well as numerous technical reports and proceedings of symposia held as part of its annual conferences. RRF's purpose is to stimulate the dissemination of information concerning raptorial birds among interested persons worldwide and to promote a better public understanding and appreciation of the value of birds of prey.

BLM's proposed Plan is of great interest to RRF's members. Ten years ago, RRF provided comments to BLM on the Draft Environmental Impact Statement on management of the National Petroleum Reserve-Alaska (NPRA) including recommendations for managing the CRSA (Attachment 1). While RRF is pleased that BLM is developing a management plan for the CRSA, we are disappointed that the Plan proposes a habitat protection setback (i.e., Protection 1) that is half the distance recommended by RRF, participants in the Raptor Disturbance and Mitigation Workshop for the NPRA (Attachment 2), and 47 specialists in raptor biology (Attachment 3). RRF does not believe that scientific information supporting a lesser setback has been developed since these recommendations were provided.

RRF urges BLM to adopt a minimum 2-mile habitat protection setback along both sides of the

Colville, Kikiarorak, and Kogosukruk rivers and their tributaries within the CRSA. RRF believes that a 2-mile setback is necessary to fully protect foraging habitat upon which raptors nesting in the CRSA depend. As you know, federal law requires "Any exploration within [areas] containing any significant subsistence, recreational, fish and wildlife, or historical or scenic value, shall be conducted in a manner which will assure the maximum protection of such surface values to the extent consistent with the requirements of this Act for the exploration of the reserve." (42 USC 6504). Given the extraordinary significance of the CRSA's assemblage of nesting birds of prey, capabilities of modern horizontal drilling technology, and the small proportion of the NPRA that would be affected, RRF believes that a 2-mile setback is entirely consistent with this statutory direction.

Sincerely,

Leonard Young, President
Raptor Research Foundation, Inc.