



The U.S. Shorebird Conservation Plan

Building Partnerships for Shorebird Conservation

Catherine Hickey, Chair
PRBO Conservation Sciences
4990 Shoreline Highway One
Stinson Beach, CA 94970 USA

John Cecil, Vice-Chair
National Audubon Society
545 Almshouse Road
Ivyland, PA 18974 USA

Brad Andres, Coordinator
U. S. Fish and Wildlife Service
P.O.Box 25486, DFC-Parfet
Denver, CO 80225-0486 USA

12 February 2008

Mr. Jonathan Jemming, Director
Resource Development Coordination Committee
Public Lands Policy Coordination Office
5110 State Office Building
P.O. Box 141107
Salt Lake City, Utah 84114-1107

Dear Mr. Jemming,

On behalf of the U.S. Shorebird Conservation Plan, we would like to offer comments on proposed drilling permits currently under review for Gunnison Bay in the Great Salt Lake. The U.S. Shorebird Conservation Plan Council represents a collective of individuals and organizations interested in the long-term conservation of North American-breeding shorebirds, as outlined in the U.S. Shorebird Conservation Plan.

We understand that Pearl Montana Exploration & Development LTD plans to develop exploratory wells in the Great Salt Lake in Gunnison Bay near Spiral Jetty and between the Jetty and Gunnison Island. Although the leases were made in accordance with the 1996 Mineral Lease Plan, we believe the 12-year-old lease needs further review to better consider the natural resources of the Great Salt Lake. We are also concerned that lease decisions are not considering the cumulative effects of all development around Great Salt Lake, such as current mineral leases and the environmental effects if Pearl Montana Exploration & Development LTD decides to pursue production.

We are sure you are aware of the importance of the Great Salt Lake to migrant shorebirds; more than one million shorebirds use the lake to build fat to fuel their long migratory flights. Great Salt Lake is particularly important to species such as the American Avocet, Black-necked Stilt, Marbled Godwit, Long-billed Curlew, Red-necked Phalarope, and Wilson's Phalarope. In addition, Great Salt Lake supports the largest breeding aggregation of Snowy Plovers in the Western Hemisphere. Great Salt Lake's importance to shorebirds was formally recognized when it was dedicated in 1991 as a Western Hemisphere Shorebird Reserve Network site of

hemispheric importance, and when the Gunnison Bay/North Arm, along with other sections of the lake, was recognized as a Globally Important Bird Area in 2004.

Great Salt Lake is also one of the most important sites for transient and breeding waterbirds in the Western Hemisphere. The lake supports some of the largest populations of Eared Grebes, White-faced Ibis, and California Gulls. Gunnison Island, located near the proposed drilling site, is an important breeding site for American White Pelicans. Migrant waterfowl use of the lake is also important both biologically and economically to the state of Utah. For example, approximately 75% of the western population of Tundra Swans uses the lake during their migration from Alaska to California.

As you review these permits for Gunnison Bay drilling, we urge you to carefully consider the public trust value of the lake to migratory shorebirds, waterbirds, and waterfowl. Beyond direct effects on migratory bird populations, such as disturbance and poisoning from heavy metals leaked into the lake during drilling, uninformed development decisions could indirectly affect birds by reducing the quality or quantity of food resources.

Because many shorebirds travel long-distances during their twice-yearly migrations, maintaining high quality stopover habitats across their entire pathway is critical for successfully completing their annual ritual. We ask that you consider the complete footprint of development in and around Great Salt Lake, both present and proposed, when assessing the impacts on shorebirds and other natural resources.

Thank you for your consideration. Please contact Brad Andres, National Coordinator of the U.S. Shorebird Conservation Plan (303-275-2324; brad_andres@fws.gov), if you have questions.

Sincerely,

Catherine Hickey /s/

Chair, U.S. Shorebird Conservation Plan Council

xc: Governor Jon M. Huntsman, Jr.
Mr. Michael Mower, State Planning Coordinator
Mr. John Harja, Director, Public Lands Policy Coordination Office
Mr. John Baza, Director, Utah Division of Oil, Gas and Mining