

MEMORANDUM

State of Alaska

Department of Fish and Game
Habitat Section

TO: James Hyun
Office of Project Management and
Permitting Alaska Department
of Natural Resources

DATE: December 26, 2025

THRU: Ken Bouwens *KB*
Southcentral Regional Supervisor

SUBJECT: ADF&G comments on
BOEM Cook Inlet BBC1 Lease
Sales 2026

FROM: Amber Stephens *ADS*
Habitat Biologist II

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The Alaska Department of Fish and Game (ADF&G) received the Bureau of Ocean Energy Management's (BOEM's) proposed Notice of Sale (NOS) for the Cook Inlet OCS Oil and Gas Lease Sale (Lease Sale BBC1) as required by the One Big Beautiful Bill Act. The NOS outlines the proposed size, timing, and location of the lease sale. ADF&G has reviewed the NOS package, including the lease stipulations, which remain unchanged from those included in the Cook Inlet Lease Sale 244 Final NOS (82 FR 23291), published on May 22, 2017. ADF&G would like to provide the following comments for BOEM to consider.

Stipulation No. 2 Protection of Biological Resources

It is unclear how BOEM will identify biological populations or habitats that may require additional protection under Stipulation 2. It is not specified whether this will be accomplished through agency consultation, review of existing reports, or other mechanisms.

As part of the process for identifying special biological resources, ADF&G recommends voluntary consultation with ADF&G's Threatened, Endangered, and Diversity (TED) Program (ADF&G email contact: julie.hagelin@alaska.gov). The TED Program has spatial data related to key "species of greatest conservation need" (SGCN) habitat types within the project area and other species-specific data that can help avoid adverse effects from exploration or development. SGCN are identified in the 2025 State Wildlife Action Plan (SWAP) as a voluntary, nonregulatory alternative to the federal listing process under the Endangered Species Act (ESA). By addressing population declines early, ADF&G designates SGCN to prevent future ESA listings and ensure that natural resource use continues to benefit Alaskans without interruption or additional federal regulation.

The proposed lease area includes high and moderate value habitats for at risk SGCN and includes "Important Bird Areas" (IBAs) for several SGCN species (Table 1). ADF&G recommends that the species listed in Table 1 be considered under Lease Stipulation 2. This proactive approach will help ensure development proceeds without ESA related regulatory burdens.

Additionally, the following mapping tools can assist with identifying additional species' ranges and their habitats in the proposed project area, including species identified in the SWAP.

NMFS species and Critical Habitat:

[Alaska Protected Resources Division, Species Distribution Mapper](#)

USFWS species and Critical Habitat:

[Information for Planning and Consulting, IPaC, database](#)

Stipulation No. 9 Protection of Gillnet Fishery

The northern half of the lease sale area is within the Cook Inlet Economic Exclusion Zone (EEZ). Salmon fishing within the EEZ is managed by the National Marine Fisheries Service, so we recommend modifying this stipulation to prohibit “on-lease marine seismic surveys during the drift gillnet fishing season as designated each year by the Alaska Department of Fish and Game (ADF&G) *and/or the National Marine Fisheries Service (NMFS)*”, approximately mid-June to mid-August.”

Attachments: Table 1.

Email cc:

Al Ott, ADF&G Habitat, Fairbanks
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Table 1. “Species of greatest conservation need” (SGCN) identified in the [2025 State Wildlife Action Plan](#) with known or suspected population declines that also have “high value” and “moderate value” habitats within the project area. Species listed under the Endangered Species Act are indicated in bold. High value habitats support key breeding, migratory, feeding or non-breeding activities of SGCN. Moderate value habitats may be used regularly as travel corridors, or for feeding and non-breeding activities, but are unlikely to support breeding.

SGCN with habitat of HIGH VALUE in project area	Scientific Name	Important Bird Area (IBA)		
		Lower Cook Inlet	Kachemak Bay	Clam Gulch
Aleutian tern	<i>Onychoprion aleuticus</i>			
American golden-plover	<i>Pluvialis dominica</i>			
American herring gull	<i>Larus smithsonianus</i>			
Black scoter	<i>Melanitta americana</i>		Marine: winter; Nearshore: spring	
Black turnstone	<i>Arenaria melanocephala</i>			
Black-bellied Plover	<i>Pluvialis squatarola</i>			
Black-legged kittiwake	<i>Rissa tridactyla</i>			
Crested auklet	<i>Aethia cristatella</i>			
Dunlin	<i>Calidris alpina</i>			
Glaucous gull	<i>Larus hyperboreus</i>			
Greater yellowlegs	<i>Tringa melanoleuca</i>			
Horned grebe	<i>Podiceps auritus</i>			
Hudsonian godwit	<i>Limosa haemastica</i>			
King eider	<i>Somateria spectabilis</i>			
Least auklet	<i>Aethia pusilla</i>			
Least sandpiper	<i>Calidris minutilla</i>			
Lesser yellowlegs	<i>Tringa flavipes</i>			
Marbled godwit	<i>Limosa fedoa</i>			
Marbled murrelet	<i>Brachyramphus marmoratus</i>	Marine: summer and winter	Marine: summer and winter	
Pacific golden-plover	<i>Pluvialis fulva</i>			
Parasitic jaeger	<i>Stercorarius parasiticus</i>			

Pelagic cormorant	<i>Urile pelagicus</i>		Marine: winter	
Pigeon guillemot	<i>Cepphus columba columba</i>		Marine: winter	
Red knot	<i>Calidris canutus</i>			
Red-faced cormorant	<i>Urile urile</i>			
Rock sandpiper	<i>Calidris ptilocnemis</i>			
Ruddy turnstone	<i>Arenaria interpres</i>			
Semipalmated sandpiper	<i>Calidris pusilla</i>			
Short-billed Dowitcher	<i>Limnodromus griseus</i>			
Short-billed gull	<i>Larus brachyrhynchus</i>			
Steller's eider	<i>Polysticta stelleri</i>		Nearshore: spring	Nearshore: spring
Surf scoter	<i>Melanitta perspicillata</i>		Marine: winter	
Western grebe	<i>Aechmophorus occidentalis</i>			
Western sandpiper	<i>Calidris mauri</i>			
Whimbrel	<i>Numenius phaeopus</i>			
Yellow-billed loon	<i>Gavia adamsii</i>			
SGCN with habitat of <u>MODERATE VALUE</u> in project area	Scientific Name	Important Bird Area (IBA)		
		Lower Cook Inlet	Kachemak Bay	Clam Gulch
Killdeer	<i>Charadrius vociferus</i>			
Kittlitz's murrelet	<i>Brachyramphus brevirostris</i>	Marine: summer	Marine: summer	
Long-billed Dowitcher	<i>Limnodromus scolopaceus</i>			
Pink-footed shearwater	<i>Puffinus creatopus</i>			
Red phalarope	<i>Phalaropus fulicarius</i>			
Red-necked phalarope	<i>Phalaropus lobatus</i>			
Sharp-tailed sandpiper	<i>Calidris acuminata</i>			
Short-tailed albatross	<i>Phoebastria albatrus</i>			
Surfbird	<i>Calidris virgata</i>			
Tufted puffin	<i>Fratercula cirrhata</i>			