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July 13, 2004

NPR-A Planning Team
 Bureau of Land Management, Alaska State Office (931)
 222 West 7th Avenue
 Anchorage, AK 99513-7599

Re: Proposed Amendment to the Integrated Activity Plan for the Northeast National Petroleum Reserve – Alaska

Dear NPR-A Planning Team,

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Please accept these comments on the Draft Amendment to the Northeast National Petroleum Reserve – Alaska (NPR-A) Integrated Activity Plan/Environmental Impact Statement (IAP/EIS). I urge you to name Alternative A, the No Action Alternative as the Preferred Alternative, rather than Alternative B in the final draft of the IAP/EIS.

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The primary problem with Alternative B is the vast discrepancy between the additional environmental impact from adopting this plan and the potential additional benefit from adopting this plan. Alternative B makes available for exploration only 9% more of the NPR-A than is available through the No Action Alternative. It has been suggested that making the entire NPR-A available for exploration (a 13% increase in available lands from the No Action Alternative) would only create the potential of discovering an additional 2 billion barrels of oil.¹ Currently the U.S. consumes over 20 million barrels of oil per day.² Thus, even if all 2 billion barrels of oil were discovered in the smaller area of land made available for exploration under Alternative B, the recoverable oil could only sustain U.S. oil needs for a mere 100 days. This is hardly a valid means of ensuring long term independence from foreign oil producers.

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Basic

The limited resources expected to be discovered by adoption of Alternative B cannot justify the additional environmental impact of this plan. According to the Draft Amended IAP/EIS, Alternative B will create additional impact to water quality, water resources, air quality, soils, birds, fish, mammals, cultural resources, and every other area of concern. These impacts have the potential to cause permanent damage to the local environment, all for a possible supply of an additional 100-day supply of oil. Particularly disconcerting is the potential impact to the Teshekpuk Lake. As noted in the Draft Amended IAP/EIS, “[t]he water flow patterns in this extraordinarily flat landscape are complex, and the outlets and inlets can reverse flow, depending on lake levels and stream flows.”³ The exploration activities that would be allowed under Alternative B have the potential to significantly affect both lake levels and stream flows at Teshekpuk Lake, which would harm this ecologically important area.

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Teshekpuk
Lake

¹ Northeast NPR – Alaska, at <http://69.20.72.207/nenpra/default.html> (last visited July 13, 2004).

² See <http://www.eia.doe.gov/emeu/ipsr/t24.xls> (last visited July 13, 2004).

³ Draft Amended IAP/EIS, at 2-5 (2004).

5

A second problem with Alternative B is the use of performance-based stipulations for environmental protection. Compared to the prescriptive-based stipulations outlined in the 1998 plan and employed in the No Action Alternative, the performance-based stipulations provide inadequate protection of environmental interests. The performance-based stipulations provide too much leeway for industrial interests by allowing industry to use economic costs to influence their choices of environmental impact mitigation practices. This is an inexcusable loophole that will surely be exploited by industry to avoid proper environmental protection.

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In sum, the Bureau of Land Management has not proposed significant justification for choosing Alternative B as the "Preferred Alternative" considering the minute potential additional benefit and the massive potential additional environmental impact of this plan over Alternative A. As such, I urge the Bureau to adopt Alternative A, the No Action Alternative, as the Preferred Alternative in the Final Draft of the IAP/EIS.

Sincerely,



P. Matthew Shudtz