

August 16, 2004

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Northeast NPR-A Plan Amendment Bureau of Land Management Alaska State Office
Alaska State Office
222 West 7th Avenue
Anchorage, AK 99513-7599

Subject: Please DO NOT Open NPR-A for Drilling or Development

Dear Northeast NPR-A Plan Amendment Alaska State Office:

1

Please accept this letter as my statement for the public record that I ask the Administration to reject the opening of the northeastern planning area of the National Petroleum Reserve-Alaska (NPR-A) at this time. The only CONSERVATIVE thing to do is to save any energy resources that may be present for future dire needs. Furthermore, the wholesale opening of all important wild areas regardless of their importance to birds and wildlife is simply unconscionable.

2

I write also for my husband who is also strongly opposed to your preferred so-called alternative for the amending the oil and gas leasing plan for the northeastern planning area of the National Petroleum Reserve-Alaska (NPR-A).

3

We both urge you to instead abandon this sweeping and reckless change and instead select Alternative A, the No Action Alternative, at this time. It is imperative that fair consideration be given to all uses of these public MULTIPLE USE lands! Our comments are that this plan runs roughshod over any other legitimate use of these lands. Millions like us wish to see at least 25 percent of the acreage in the planning area preserved as wilderness. This is most critical in the areas that are critical to millions of migratory waterfowl, such as the critical and fragile Teshekpuk Lake region.

4

Opening all the lands contemplated by the Administration is simply too great of a risk to the bird and wildlife species that summer there. Spills will occur. Even worse, the simple presence of development will impact the caribou herds that calve in the region. , the consequences too likely to be irreversible.

005
Birds

This leads to our other specific comment, that you cannot ethically ignore your own Interior Department's scientists and data. This data, gathered between 1999 and 2003, unambiguously shows how an average of 47 percent of the brant and 44 percent of the white-fronted geese that now molt on lakes that would be partly or wholly unprotected in your preferred alternative. Those are huge population impacts that are not reasonably brushed aside for political expediency. Further, the preferred alternative would diminish protection for the caribou by fully

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6 75 percent. Available science clearly indicates that geese are highly sensitive to disturbance during the molt. And it shows that caribou that give birth to their young in this area are also at risk from the kind of disturbance your preferred alternative would permit. These risks are simply not acceptable, and neither are they necessary. The energy that could be developed here would take ten years to reach market and would represent scant days of our national use. These lands are simply more valuable to the public protected as wilderness.

7 There is no data to show that these areas, which rightly are CLOSED under the existing leasing plan, can be safely opened. Where is there any scientifically based evidence that these areas can be opened safely? There is none! Your proposal would jeopardize a globally significant ecological resource. For that reason it is not logical and it does not meet the stewardship responsibilities that the Interior Department must operate under. Adequate study and research supporting the political conclusions you desire must be in place before a Plan like this can legally and ethically take effect.

8 The BLM must study the complete impacts on the entire Teshekpuk Lake Surface Protection Area. We feel that it clearly deserves our nation's most careful protection. It is not reasonable that your preferred alternative A would reduce protection to a scant 213,000 acres, less than five percent of the planning area. That level of protection will not begin to protect the geese, the caribou or the dozens of other species that now find safety there.

At this time, we do not see any choice but for the Agency to select Alternative A, the No Action Alternative. We ask that you please do so as your final decision for this plan. Thank-you,

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