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Comment: NE NPRA Amendment Planning Team
c/o Susan Childs
Bureau of Land Management
Alaska State Office
222 West 7th Avenue
Anchorage, AK 99513-7599

Dear NPR-A Planning Team,

1

Thank you for the opportunity to comment on the Bureau of Land Management's (BLM) draft integrated activity plan and environmental impact statement (IAP/EIS) for the northeast National Petroleum Reserve - Alaska (NE NPRA). The Wildlife Conservation Society (WCS) is a science-based conservation organization with historical and current efforts in the arctic coastal plain of Alaska. In the 1950s (then as the New York Zoological Society) we undertook field studies that helped establish the Arctic National Wildlife Refuge. Currently, we collaborate with BP, ConocoPhillips, the US Fish and Wildlife Service, Manomet Bird Observatory, and others in testing the impacts of oil development infrastructure (and associated increases in nest predators like arctic fox, raven, and gulls) on tundra-nesting birds in the North Slope oilfields.

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We have serious concerns about the proposed development plans in the northeast portion of the National Petroleum Reserve-Alaska. The NPR-A is our largest single piece of public land in the United States, and is widely recognized for its considerable wildlife and wilderness values, as well as its importance for subsistence hunting. As in other recent amendments of planning we feel that the alternatives represent far too aggressive development plans. In particular we feel the following issues, as further explored in this letter, require serious attention:

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- Alternatives B and C would adversely affect wildlife in the Teshekpuk Lake Special Area, in particular, but also the Colville River Special Area. The risk of impacting waterfowl in the Teshekpuk Lake Special Area is high.

004
Special
Designation

- Special Area designation in the NPR-A was intended to confer protection. The current and recent BLM development plans do not reflect this. The BLM needs to define what Special Areas are and what they mean on the land before subsequent development is laid out. We suggest the BLM formally stipulate specific wildlife protection actions in each of the Special Areas.

005
Cumulative

- The dearth of information the cumulative effects of two issues in particular - oil and gas development and climate change -- on wildlife, particularly shorebird distribution patterns, are poorly considered in this IAP/EIS, and make any real consideration of further development premature.

006
Special
Designation

The Teshekpuk Lake Special Area is perhaps the most important region of the NPR-A for wildlife. It is a truly unique place in the world. It is clearly the most significant goose

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006 (Cont'd)
Special
Designation

molting area in the circumpolar arctic. Up to thirty percent of the Pacific Flyway Brant Geese population molts in this region. This is also an important molting area for Canada Geese, Snow Geese, and White-fronted Geese. There is considerable scientific literature that makes clear these molting geese are easily stressed by anthropogenic disturbance, and that such stress could negatively affect these populations. It is also the major calving ground for the Teshekpuk Lake caribou herd which numbers about 45,000. Further, the Teshekpuk Lake Special Area contains a significant number of the world's population of Yellow-billed Loons, and large numbers of the Federally Endangered Spectacled Eider, plus important populations of other sensitive and/or declining species like King Eider, Long-tailed Ducks, Buff-breasted Sandpipers, and Dunlin. The proposed 213,000-acre no-lease zone is wholly inadequate for protecting this important region and its considerable importance to wildlife.

007
Special
Designation

The Colville River Special Area will also be affected by development. This Special Area is important for its high densities of nesting peregrine falcons, gyrfalcons, and rough-legged hawks. How such proposed development might affect these species and others in this region of the NPR-A is unknown.

008
Special
Designation

The concept of and protection afforded by Special Area status in the NPR-A is unclear at best. The history of Special Areas suggest that they be afforded "maximum protection" consistent with exploration issues. The recent history of development proposals by the BLM, including the current IAP/EIS, suggests very little consideration for protection. In fact, the 213,000-acre no-lease zone in the Teshekpuk Lake Special Area is clearly too small to encompass the critical habitat needed for waterfowl staging and molt protection as so violates the concept of maximum protection. We suggest that the Department of the Interior make clear just what Special Areas really stand for, and therefore what status and importance the three Special Areas have as development plans continue to encompass the NPR-A. We feel the American public should know up front if these Special Areas really mean anything more than abstract areas on a map. If the concept of Special Areas is to have any real value, their value and protection should be established prior to ongoing development plans. We suggest that the BLM specifically lay out the protection needed for waterfowl staging and molting habitat in the Teshekpuk Lake Special Area, and define the parameters of protection for raptors in the Colville River Special Area. We strongly feel that these Special Areas need be fully protected, their wildlife value asserted formally, and their existing boundaries afford them real protection from development.

009
Cumulative

The Wildlife Conservation Society is a science-driven conservation organization. We are collaborating with others to evaluate whether there is an effect of oil development on nesting shorebirds and waterfowl. In this light, we strongly feel that existing information on wildlife species and wildlife habitat was poorly integrated in this IAP/EIS. There is no real effort to imagine and integrate concerns over cumulative effects from the ever-growing infrastructure and activities related to oil development on the North Slope. That the IAP/EIS did not thoroughly and realistically address potential and actual environmental impacts means that the proposed alternatives cannot be meaningfully assessed.

010
Wildlife

There are virtually no data from on-the-ground studies of wildlife, wildlife habitat needs,

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010 (Cont'd)
Wildlife

wildlife interactions, and demographic patterns in the NPR-A. Such information is critical to any realistic environmental assessment. Most all wildlife geographic and abundance patterns available are only from aerial surveys. There are no data for waterfowl or shorebirds, for example, which identify where "source" and "sink" demographic areas are. Further, there are no on-the-ground data to identify key regions of shorebird abundance, as this group is too small to reliably assess from aerial surveys. The paucity of on-the-ground studies means a critical dearth of needed ecological information concerning this diverse assemblage of species.

011
Global
Warming

Concerns regarding the changing climate of the arctic are not addressed. The interactive effects of widespread thermokarst, soil erosion, plant changes, and how these issues might affect the coastal plain environs for wildlife was scarcely mentioned. Most critically, changes in sea level would likely dramatically force shifts in animal distributions in low-lying arctic coastal plain areas of the NPR-A. The question is no longer if climate change is occurring, but how and when its affects will become manifest. There is scarce consideration of this huge issue, and its likely strong effects on wildlife and habitats in the arctic coastal plain as they may relate to the environment of the northeast NPR-A. .

012
Cumulative

Finally, and most important, the recent National Academy of Sciences report, "Cumulative Environmental Effects of Oil and Gas Activities on Alaska's North Slope (2003)" makes clear that although there are several solid individual studies of how oil activity affects the arctic coastal plain wildlife and environs, yet there is no assessment of the potential cumulative effects in this IAP/EIS. Recently, Assistant Interior Secretary Rebecca Watson told a coalition of conservation groups that the department had told lower 48 Bureau of Land Management state and regional officers they have the right to defer leasing until effects on wildlife are studied more thoroughly. We ask for similar consideration in the NPR-A.

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In light of the concerns outlined above, we recommend "Alternative A - No changes to the current plan" as the preferred alternative. This option still leaves 86% (4 million of a total 4.6 million acres) of the NPR-A to oil and gas leasing. Alternatives B (96% development) and C (100 % development) represent blueprints for development that give wholly insufficient consideration of ecosystem and subsistent needs of the region.

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We recognize the nation's need for increased supplies of energy, and do believe that the NPR-A has a role in providing oil and gas resources to the country. We also believe that Americans citizens and American industry must inevitably shift their dependence on oil to other sources of energy. We feel that the lasting value of the arctic coastal plain lies in its wildness and its wildlife, and we urge the BLM to consider a more balanced management strategy than the aggressive development options provided.

Sincerely,

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Attached: None