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Central Sierra Environmental Resource Center

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NE NPR-A Amendment Planning Team
Bureau of Land Management
Alaska State Office
222 West 7th Ave.
Anchorage, AK 99513-7599

Dear NE NPR-A Amendment Planning Team:

We are submitting this letter regarding the proposed amendment to the oil and gas leasing plan for the northeastern National Petroleum Reserve-Alaska.

001
Wetlands

Our Center is concerned by proposals to reduce the size of the Teshekpuk Lake Surface Protection Area and to allow oil development in a large portion of this area. This area is one of the most important wetlands complexes in the circumpolar Arctic, and is an area of international ecological importance where exploration is inappropriate. The cumulative impacts on waterfowl and caribou due to increased disturbance, displacement and predation resulting from the oilfield development would imperil these wildlife populations.

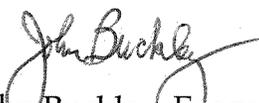
002
Caribou

In particular, the no-lease area of 213,00 acres proposed to protect goose molting habitat is inadequate to protect the biological integrity of the Teshekpuk Lake caribou herd. Past experiences in the Prudhoe Bay and Kuparuk oilfields indicate that pregnant cows and cows with newborn calves avoid infrastructure. Since Teshekpuk Lake is currently used as a corridor between the herd's main foraging area and the insect relief area of the Beaufort Sea coast, development activities would likely displace caribou from their traditionally preferred habitat and decrease herd health and abundance.

003
Alternatives

When over 87% of the 23.5 million acre preserve is available for oil and gas activity, we do not believe that opening this extremely valuable and sensitive ecological area reasonably balances oil development and biological resources. There is no scientific evidence to support the belief that best practice measures would sufficiently mitigate the environmental impacts to vulnerable wildlife populations. Therefore, we ask you to protect the entire Teshekpuk Lake Surface Protection Area and to Adopt Alternative A.

Thank you for considering these comments,


John Buckley, Executive Director


Michael Milne, Staff biologist