Website Comment **196264**

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Comment: To Whom It May Concern:

1

The comments I offer below reflect my personal experiences within the NPR-A and other areas of arctic Alaska. Specifically, I participated in the 1987-1988 experimental goose disturbance studies that the U.S. Fish and Wildlife Service conducted in the East Long Lake-West Long Lake-Island Lake study areas. Prior to that, I conducted studies of yellow-billed loon breeding ecology on the Colville River delta in 1983-1984.

General Comments

2

003 Birds

I support Alternative A. The 1998 Record of Decision provides a perfectly viable and strong jusification for the exclusion of the Teshekpuk Lake Special Area from oil and gas leasing, and the current draft EIS does not provide a convicing basis for overturning that former decision. I am particularly concerned that the 213,000 acre proposed goose molting exclusion area is insufficient. Specifically, leasing is proposed in the township that contains the southern half of East Long Lake and the eastern portions of West Long Lake and Goose Lake. These are significant goose molting lakes. I am further concerned that this EIS is a classic piece of obfuscation. For example, on page 4-204, the second full paragraph states that the proposed alternative would be "providing setbacks from goose molting lakes within which permanent oil and gas facilities would be prohibited" "protect the goose molting lakes from oil and gas-related disturbance by requiring features that would screen or shiled human activity from the view of any goose molting lake". The paragraph goes on to reference Lease Stipulation K-4. On page 2-30, Lease Stipulation K-4 allows for oil facilities to be constructed IN THE LAKE provided the facility is more than 3/4ths mile from shore! This paragraph and this lease stipulation are in diagreement with one another. Furthermore, it will be impossible to screen any facility located in the middle of a goose molting lake from the molting geese, especially since their response to disturbances (natural or human) often results in their movement into the lake for protection.

4

I am further appalled that drilling facilities are being proposed to be allowed in the basin of Teshekpuk Lake itself. The risks to the lake from spills is too great, and the assured aesthethic alteration of the lake is unacceptable.

5

On page 1-6,the EIS states BLM expects any plan amendment to have a life of 10-15 years. Yet here BLM is proposing to abandon the plan in less than 6 years after its adoption. This revision appears politically motivated, rather than resource motivated. It is of further curiousity to me that the draft EIS (see page 1 of executive summary) states the BLM is proposing "to consider" opening portions of planning area formerly closed, that the EIS on page 1-10 states that one aspect of this amendment "is possible oil and gas leasing" and that the "Welcome" page of the EIS website clearly states that "BLM HAS NOT made any decision to ... Open additional lands for oil and gas leasing" whereas in a BLM press release dated June 9, 2004 and updated Jluy 14, 2004, Director Henri Bisson presents this as a specific proposal rather than a plan to study it. It seems this is a foregone conclusion that oil and gas leasing will occur, contrary to statements otherwise in the EIS.

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006 Stips & ROPs

The prescriptive based stipulations need to be maintained. The preformanced-based stipulations are often too vague and unenforceable, nor are they consistent. For example, in the Executive Summary of the EIS, in the shaded box, is a statement that the minimum height of any new pipeline would be 7 feet; in the BLM press release already referenced is a statement they would be 5 feet. These inconsistencies do not allow reviewers to fully understand exactly what is being proposed. For another example, on page 3 of the executive summary is another preformance based stipulation: "minimize disruption of caribou movement". "Minimization" is impossible to measure, hence uneforceable. Another example: on page 2-19 Stipulation D-1 states explatory drilling is prohibited in fish bearing lakes. But in reality its not, because drilling is being allowed in goose molting lakes and Teshekpuk Lake (see p.2-29, 2-78). Another example: top of page 2-21, a requirement is "consideration shall be given ..." How is "consideration" measured and enforced? On page 2-24 (Stipulation F-1.e.) is the statement, "Aircraft use ... in the Goose Molting Area should be minimized ..." "Should be" and "minimized" are two vague concepts; how are they measureable and eforceable? On p. 2-31, Stipulation K-4.h., what are "nonessential helicopter overflights"? Are oil companies expending revenues on flights they consider frivolous, or would they consider every flight "essential"? And on the same page Stipulation K-4.i. states, regarding overflights in goose molting area, "... restrictions may include ..." How is this enforceable?

007 Alternatives

The range of alternatives considered in the draft EIS is inadequate (see page 2-9). Alternatives that would open up less areas than allowed in the 1998 ROD should be consdiered as well. They seem to be dismissed because of the 1998 ROD, but if that is the basis for dismissing them, than current Alternatives B and C should be dismissed as well.

Specific Comments:

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Page 2-3. Is the "President's National Energy Development Policy Group" the secretive group advising Vice President Dick Cheney? If so, who comprises that group of advisors and to what extent are they driving this decision by BLM to revisit the 1998 ROD?

009 Birds

Page 2-22. Special Conditions in Yellow-billed Loon Habitats. On the surface, these conditions appear to be good measures for protecting yellow-billed loons. I am concerned however, that there are hidden provisions elsewhere that may render these moot.

010 Stips & ROPs

Page 2-23, Stipulation E-12. Since eider surveys are required before authorization of construction (see p. 2-22), why not REQUIRE ground-based wildlife surveys at the same time rather than level it to the discretion of the AO?

011 Stips & ROPs

Page 2-56, Stipulation K-1.a. Colville River. Why is an exception to this provision to allow publicly funded roads within 1-mile of the Colville River needed? Why cannot publicly funded roads also be offset one-mile from the river? Is there a specific proposal for just such a public road that would benefit the oil industry? If so, that should be disclosed. If not, this exception should be eliminated. The Colville River is a critical travel corridor for big game species that are easily exploited, and a road close to the river would have

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profound effects on the rate of exploitation and the viablility of their populations.

012 Fish

Page 3-33. I have found that tapped lakes are largely devoid of fish (see my 1986 Master's thesis, which you reference regarding yellow-billed loons). References here to the contrary should be cited. I would like to know who derived these results, what time of year they sampled, and what methodology they used. Any events that convert non-tapped lakes to tapped lakes would result in signficant impacts to waterbird habitat and fish habitat

013 Pipelines

Page 4-28, paragraph 1. The statement that any new pipelines would follow roads (I interpret this to be permanent roads) seems contradictory to the statements on page 4-13 that winter roads are now in vogue over permanent gravel roads, especially in light of the lack of gravel resources in the planning area. Please explain this apparent discrepancy.

014 Basic

Page 4-28, paragraph 2, last sentence. If production from this planning area may be delayed 5-10 years as a result of limitations on pipeline capacity, and if it is BLM's expectation that plans have a life of 10-15 years, what is the justification for recommending modifications to the 1998 ROD so early into the Plan's life? Alternative A seems to best address the current realities of the situation as well as meet BLM policy regarding life of plans.

015 Stips & ROPs

Page 4-219, fourth paragraph. Stipulation K-4 does NOT provide the setbacks from goose molting lakes as implied here. Stipulation K-4 allows for drilling IN THE LAKES in the Goose Molting Area.

016 Impact

Page 4-222. first paragraph regarding eiders. The statement that "The potential types of effects" of increased predation would be the same for Alternatives A and B is an example of obfuscation. The "types of effects" is not the issue the EIS needs to address; the issue the EIS needs to address is the magnitude or extent of the effects of alternative B versus Alternative A.

Attached: None