

Section I

Introduction

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I. INTRODUCTION

Preview of this Section

Section I provides important background regarding this Integrated Activity Plan/Environmental Impact Statement (IAP/EIS). This section:

- describes the legislative and regulatory authority upon which the IAP/EIS is based;
- explains why the Bureau of Land Management (BLM) defines the Northwest National Petroleum Reserve-Alaska (NPR-A) Planning Area as it does;
- provides an administrative history of the NPR-A;
- discusses Special Areas, a designation unique to NPR-A;
- explains several technicalities about the Northwest Planning Area's boundaries;
- describes the relationship of this document to prior BLM plans;
- describes how this IAP/EIS is being constructed with the help of the public; and
- lists the major issues raised during scoping and considered in this IAP/EIS.

When you have finished reading this section, you will understand the reasons this IAP/EIS is being prepared, some of the basics regarding how it is being prepared, and the major issues that the IAP/EIS examines.

A. PURPOSE AND NEED

The Bureau of Land Management (BLM) initiated the Northwest National Petroleum Reserve-Alaska (NPR-A, also referred to as the Reserve) Integrated Activity Plan/Environmental Impact Statement (IAP/EIS) to determine the appropriate multiple-use management of this 8.8-million-acre area consistent with existing statutory direction for its management (Map 01 and Map 02). Specifically, the Naval Petroleum Reserves Production Act of 1976 (NPRPA), as amended, encourages oil and gas leasing in NPR-A while requiring protection of important surface resources and uses. To carry out its management responsibilities, BLM is addressing three major questions in this IAP/EIS.

1. What lands should BLM offer for oil and gas leasing?
2. What measures should be developed to protect important surface resources from the impacts of oil and gas activities?
3. Consistent with the existing statutory direction for the area, what non-oil and gas land allocations should be considered for this portion of the NPR-A?

1. Authority

Congress authorized "an expeditious program of competitive leasing of oil and gas" in the NPR-A in 1980 (P.L. 96-514, Dec. 12, 1980). Leases that the BLM issued in 1982 and 1983 have now expired. Federal land in the Northwest NPR-A is currently unavailable for leasing because existing National Environmental Policy Act (NEPA) documentation is dated and no longer adequate; however, none of the public land in the Northwest NPR-A Planning Area is closed, i.e., withdrawn from oil and gas leasing. If BLM decides to undertake renewed leasing in the Planning Area, the final IAP/EIS will be the basic NEPA analysis for that authorization. The Record of Decision (ROD) will identify those areas that will be made available and unavailable for leasing.

The BLM is undertaking this IAP/EIS to fulfill the mandates of the President's energy policy and BLM's responsibilities to manage these lands under authority of two laws passed in 1976--the Naval Petroleum Reserves Production Act (NPRPA) and the Federal Land Policy and Management Act (FLPMA). The President's energy policy directs the Secretary of the Interior (the Secretary) to "consider additional environmentally responsible oil and gas development, based on sound science and the best available technology, through further lease sales in the National Petroleum Reserve-Alaska."

The Northwest NPR-A IAP/EIS addresses BLM responsibilities under the NPRPA and FLPMA through a NEPA-required process. The document provides the public and government officials an opportunity to take a comprehensive look at future management of the area, including the potential for oil and gas leasing and possible Wilderness and Wild and Scenic Rivers Act designations. The BLM expects the plan to have a life of 10 to 15 years, though it may prove suitable for either a shorter or longer period.

The authority for the management options in the IAP/EIS comes from several statutes, including NEPA, the Alaska National Interest Lands Conservation Act (ANILCA), the Wilderness Act, the Wild and Scenic Rivers Act, and particularly FLPMA and the NPRPA. Under FLPMA, the Secretary has broad authority to regulate the use, occupancy, and development of the public lands and to take whatever action is required to prevent unnecessary or undue degradation of the public lands (43 U.S.C. § 1732).

Under the NPRPA, the Secretary has the authority to conduct oil and gas leasing and development in the NPR-A (42 U.S.C. § 6508). The NPRPA also provides that the Secretary "shall assume all responsibilities" for "any activities related to the protection of environmental, fish and wildlife, and historical or scenic values" (42 U.S.C. § 6503(b)). In addition, the NPRPA authorizes the Secretary to "promulgate such rules and regulations as he deems necessary and appropriate for the protection of such values within the reserve" (42 U.S.C. § 6503(b)). The NPRPA, as amended, contains special provisions that apply to any exploration or development activities within areas "designated by the Secretary of the Interior containing any significant subsistence, recreational, fish and wildlife, or historical or scenic value" (42 U.S.C. § 6504(b), 6508). Portions of the Teshekpuk Lake and the Colville River Special Areas are within the Northwest NPR-A Planning Area. These provisions require that any oil and gas exploration or development within a special area "shall be conducted in a manner which will assure the maximum protection of such surface resources to the extent consistent with the requirements of [the] Act for the exploration of the reserve" (42 U.S.C. § 6504(b), 6508). Oil and gas activities must include or provide for "conditions, restrictions, and prohibitions as the Secretary deems necessary or appropriate to mitigate reasonably foreseeable and significantly adverse effects on the surface resources of the NPR-A" (42 U.S.C. § 6508(1)). In conducting this IAP/EIS, BLM is fulfilling these statutory mandates.

This IAP/EIS is consistent with the major goal of the NPRPA, namely helping to meet the total energy needs of the Nation by assessing opportunities for oil and gas production on Federal lands in the Northwest NPR-A Planning Area while protecting other resources. Because it takes years to find, delineate, and develop a producing oil or gasfield in the remote arctic environment, oil and gas leasing is not conducted to meet today's need but to meet future needs.

The U.S. currently imports more than half of its petroleum supply, and the Federal Government projects that the proportion of the Nation's oil coming from overseas will continue to climb, approaching two-thirds by 2020. Oil

production in the U.S. overall and on Alaska's North Slope declined through 2001 (U.S. Department of Energy, 2002; Alyeska Pipeline Service Company, 2001, 2002). According to the DOE, importation of foreign oil significantly increases this country's trade deficit. Domestic oil production, especially on Federal lands, contributes directly to the health of the Nation's economy and to Federal revenues. The oil industry provides jobs, many of them high-skill and high-pay jobs. Lease sales, rentals, bonuses, and royalties from Federal oil and gas leases contribute to the Federal treasury, as do taxes paid by oil companies and their workers. Oil produced from the NPR-A would be transported using excess capacity of the existing Trans-Alaska Pipeline System (TAPS), which would be available in the timeframe projected for development of new NPR-A fields.

In addition to management actions in this IAP/EIS that contribute to ensuring a healthy and productive ecosystem, the BLM is engaged in inventory and monitoring to meet that goal. (Appendix A describes ongoing and anticipated inventory and monitoring efforts.) For example, BLM has worked with Ducks Unlimited since 1994 to define the vegetative land cover of the NPR-A and the agency is now linking this habitat information with wildlife data compiled by the USDO, Fish and Wildlife Service (FWS), and the Alaska Department of Fish and Game (ADF&G). The BLM has also worked with the U.S. Geological Survey (USGS) since 2001 on two projects. One is providing digital infrared imagery of the northeastern part of the Northwest NPR-A Planning Area to inventory vegetation health; the other is providing elevation measurements at 5-m increments to a precision of no more than 2 m. The BLM is also conveying lands within the Planning Area to Alaska Natives on the North Slope through conveyance of Native Allotments to individuals and conveyance of lands to corporations as authorized under the Alaska Native Claims Settlement Act (ANCSA). The latter include conveyances to Atqasuk corporation, Olgoonik corporation, and Ukpeagvik Inupiat corporation (the ANCSA village corporations for Atqasuk, Wainwright, and Barrow) and to the Arctic Slope Regional Corporation (ASRC) (the ANCSA corporation for North Slope Alaska Natives). These inventories and conveyances will continue under all alternatives considered in this IAP/EIS.

The Northwest IAP/EIS also fulfills BLM's mandate under Section 1320 of ANILCA, 43 U.S.C. § 1784, authorizing the Secretary, at his discretion, to "identify areas in Alaska which he determines are suitable as wilderness." This same provision of ANILCA however, states that public lands in Alaska, including NPR-A, are not subject to Section 603 of FLPMA, 43 U.S.C. § 1782. This section requires the completion of Wilderness reviews and describes the procedures for managing any lands recommended for Wilderness designation to Congress, pending Congressional action. Consequently, this plan identifies specific areas for consideration as Wilderness under the discretionary authority of ANILCA Section 1320, and not under FLPMA §603. Under Alternative C, BLM would manage lands it identifies for possible recommendation by the Secretary for Wilderness designation as Wilderness Study Areas (WSA's), pending Congressional action on the Wilderness recommendation.

Section 1320 of ANILCA also exempted the NPR-A from Section 202 of FLPMA, 43 U.S.C. § 1712. This section requires the preparation of land use plans (called Resource Management Plans, or RMP's) as provided in BLM regulations. Because of this exemption, the current IAP/EIS is not an RMP (as most BLM planning efforts are called). The statute (FLPMA § 202) and regulations governing the preparation of RMP's (43 C.F.R. Subpart 1610) do not apply to the current planning effort.

This plan does not address legislative proposals that would authorize hardrock mining or wildlife refuge designations or land identification for exchange to Native corporations. For further discussion of these and other management actions not addressed in this IAP/EIS, see Section II.G.

2. Determining the Boundary of the Planning Area

Recent oil activities in the Northeast NPR-A have helped to prompt this IAP/EIS and helped to define the Northwest NPR-A Planning Area boundaries. Following completion of the Northeast NPR-A IAP/EIS in 1998, the BLM held an oil and gas lease sale in 1999, leasing 133 tracts. Oil companies have explored and continue to explore for oil on these leased lands. ConocoPhillips Alaska, Inc. has announced promising discoveries on some of its Northeast NPR-A leases. In June 2002, oil companies purchased an additional 60 leases in the Northeast NPR-A (Map 09). With the recent discoveries of oil in the Northeast NPR-A and the prospect of development in that area, lands farther west in the Reserve have become of greater interest for oil exploration. The discoveries suggest there is oil potential for certain geological structures in parts of the Northwest NPR-A, particularly near the coast as it stretches west-northwest across much of northern Alaska toward Barrow. The BLM has included all of the west-northwest-trending coastal lands west of the Northeast NPR-A Planning Area in this IAP/EIS because of the assessment that the oil potential is greatest in this portion of the Reserve. If industry extends oil production infrastructure into the Northeast NPR-A from current oil fields the cost of developing the small to medium oil fields that may exist in the Northwest NPR-A Planning Area declines.

The growing interest in Alaska's North Slope gas reserves has also helped to prompt this IAP/EIS and to define the Planning Area's boundaries. In the past two years, industry, the State of Alaska, and the Federal Government have expressed great interest in developing means to transport North Slope gas to market. Industry has invested millions of dollars in engineering, environmental, and legal studies for a gas pipeline, and the Federal and State Governments have examined ways to encourage and expedite construction. The President's energy policy calls for a coordinated effort to expedite construction of a gas pipeline from Alaska to the contiguous 48 states. As a result of petroleum exploration and development and companies' greater interest in gas, BLM has included some lands west of Umiat in the Northwest IAP/EIS. While these lands hold prospects for oil, they have relatively greater prospects for gas.

The Northwest NPR-A Planning Area is also configured to consider the surface use issues of the local residents. Consequently, the boundaries of the Planning Area encompass lands surrounding Barrow, Atkasuk, and Wainwright, three communities in the NPR-A that are west of the Northeast NPR-A Planning Area. The plan addresses subsistence resources and access, which are of special interest to local residents.

Responding to comments received during scoping, BLM has modified its initial proposal for the Planning Area. Some commenters suggested that some issues--including Wild and Scenic River (WSR) designation--related to the future management of the upper Colville River drainage be addressed as part of a future plan that would look at larger parts of the upper Colville River. Consequently, the BLM redefined the southern Northwest NPR-A Planning Area boundary to exclude the Awuna River, a major tributary of the Colville River. The BLM will address future management of a segment of the Colville River in this IAP/EIS, but will forego examination of the uppermost Colville River basin until it plans for the southern NPR-A.

Defining the Planning Area as it does enables BLM to do a more detailed study of the surface and subsurface resources of greatest immediate interest and to plan specifically for the protection of the outstanding surface resources in the area. The majority of the lands in the Planning Area are part of the flat and wet lowlands of the arctic coastal area. The Planning Area does not extend into the high mountains of the Brooks Range that have a very different ecosystem and very different issues than do the lands closer to the coast. The Planning Area also excludes uplands identified as the core calving area of the Western Arctic herd (WAH) of caribou, which deserves special focus in a plan for the southern NPR-A. Consequently, BLM has limited the scope of the Northwest NPR-A IAP/EIS to lands of greatest interest for oil and gas development and lands of local interest rather than all of the NPR-A.

B. BACKGROUND

1. Administrative History of the National Petroleum Reserve-Alaska

In 1923, President Warren G. Harding created the Naval Petroleum Reserve Number 4 in northern Alaska (commonly called PET-4) as a defense measure. In an era in which naval armaments around the world regularly appeared in newspaper headlines and the U.S. Navy was converting its ships to oil power, the President issued an Executive Order (E.O.) establishing PET-4, noting that "the future supply of oil for the Navy is at all times a matter of national concern." He observed that "there are large seepages of petroleum along the Arctic Coast of Alaska," but existing laws to "promote development seem imperfectly applicable in the region because of its distance, difficulties, and large expense of development" (E.O. 3797-A, Feb. 27, 1923). The E.O. withdrew the lands from the application of the land and mineral laws for six years. The time limit was later deleted. For more than half a century after that, the Navy and the U.S. Geological Survey (USGS) explored the region for oil.

By the mid-1970's, the Navy's dependence on oil was dwarfed by that of the Nation's economy. The oil embargo of 1973 magnified this need. There was also a rising environmental consciousness and interest in the variety and richness of wildlife and other values in PET-4. Consequently, President Gerald Ford signed the NPRPA to develop PET-4 and the other three Naval Petroleum Reserves, but to do so "in a manner consistent with the total energy needs of the Nation" (P.L. 94-258, Apr. 5, 1976).

The NPRPA authorized production of oil from the reserves in the contiguous 48 states. Two of the three petroleum reserves in these states are now extensively developed. For example, the Elk Hills, California reserve has produced over 1.1 billion barrels of oil, including 17.3 million in 2000. This production level earns it the ranking of eleventh largest producer in the U.S. outside Alaska (U.S. Department of Energy, 2001a).

The law transferred management of PET-4 to the Secretary and renamed it the National Petroleum Reserve-Alaska and prohibited petroleum production from NPR-A until authorized by Congress. In 1980, Congress granted that authorization and directed the Secretary to undertake "an expeditious program of competitive leasing of oil and gas" in the Reserve (P.L. 96-514, Dec. 12, 1980). The immediate outcome of the authorization was the series of lease sales held by BLM in the early 1980's.

2. Existing and Proposed Special Areas within the Northwest NPR-A Planning Area

The NPRPA states that any petroleum exploration within:

areas designated by the Secretary of the Interior containing any significant subsistence, recreational, fish and wildlife, or historical or scenic value, shall be conducted in a manner which will assure the maximum protection of such surface values to the extent consistent with the requirements of this Act for exploration of the reserve (42 U.S.C. § 6504(b)).

Based on this authority, the Secretary, in 1977, designated three Special Areas. Portions of two of these areas--the

Teshkepuk Lake Special Area and the Colville River Special Area--are within the Planning Area (Map 34). The Teshkepuk Lake Special Area, the western edge of which is in the extreme northeast corner of the Northwest NPR-A Planning Area, protects migratory waterfowl and shorebirds. The Colville River Special Area, a portion of which is in the southernmost part of the Planning Area, protects the arctic peregrine falcon, which was an endangered species in 1977 (see Section III.B.1).

The Special Areas and their resources are the focus of many of the management actions and protective measures in the alternatives presented in Section II.C . These Special Areas and their resources are described in Section III.B.1 of this IAP/EIS. While none of the alternatives under consideration in the IAP/EIS modifies or eliminates any of the existing Special Areas, the Preferred Alternative and Alternative B propose creating a new Special Area at Kasegaluk Lagoon, in the extreme western portion of the Planning Area.

3. Northwest NPR-A Planning Area Boundaries

The location of the Northwest NPR-A Planning Area in relation to Alaska's North Slope is shown on Map 01 and the location of the Planning Area in relation to the rest of the NPR-A is shown on Map 02. Of the 9.4 million acres within the exterior boundary of the Planning Area, BLM administers 8.8 million acres of surface lands. Within the exterior boundary of the Planning Area, BLM administers the rights to 9.1 million acres of Federal oil and gas estate. (Note: The 9.1 million acres of Federal oil ownership are not identical to the 9.1 acres of Federal gas ownership.) This IAP/EIS offers options for the future management of all BLM-managed surface and subsurface estate within the exterior Planning Area boundary. Although the IAP/EIS discusses potential decisions to be applied to the "Planning Area," these decisions do not extend to lands outside BLM's authority. Specifically, they do not extend to surface and subsurface estate owned by the North Slope Borough and ANCSA regional or village corporations, mostly near Atkasuk, Barrow, and Wainwright; the surface lands within certified Native Allotments owned by individuals; or military lands at Point Barrow. The plan does however, explain leasing decisions on subsurface mineral estate that underlies some ANCSA village corporation surface estate and Native Allotments. The cumulative impacts section of this IAP/EIS (Sec. IV.F) considers cumulative impacts of reasonably foreseeable activities on these adjacent non-Federal lands. For more information on land status, see Section III.C.6.a.

A few technicalities regarding the boundary of the Planning Area are worth mentioning.

- Much of the eastern boundary of the Northwest NPR-A IAP/EIS Planning Area is the eastern bank of the Ikpikpuk River since the eastern bank of the Ikpikpuk River formed the western boundary of much of the adjacent Northeast NPR-A Planning Area.
- E.O. 3797-A defines NPR-A's boundary along the Colville River as the "highest highwater mark . . . on the [western] bank." The U.S. District Court in Alaska has construed this mark to be "on and along the bank at the highest level attained by the waters of the river when they reach and wash the bank without overflowing it" (*Alaska v U.S.*; A78-069 Civ). Thus, the Colville River, its southern bank, and its northern bank up to "highest highwater mark" lie outside the Planning Area.
- The northern boundary of the Planning Area encompasses the bays, lagoons, inlets, and tidal waters between NPR-A's outlying islands and the mainland west of the Ikpikpuk River. Inclusion of these features is consistent with the U.S. Supreme Court decision in *U.S. v Alaska*; No. 84, Orig. decided on June 19, 1997. In that decision, the Supreme Court determined that the NPR-A included tidally influenced waters and that those waters and their submerged lands did not transfer to the State at statehood.

4. Relationship of the IAP/EIS to Past BLM Plans in the Planning Area

The Congress first authorized an oil and gas leasing in the NPR-A in the Department of the Interior and Related Agencies' Fiscal Year (FY) 1981 Appropriations Act (P.L. 96-514, Dec.12, 1980). To meet the provisions of NEPA to conduct lease sales, the BLM completed an Environmental Assessment (EA) of the NPR-A in 1981 and an EIS in 1983 (USDO, BLM, 1983). The 1983 EIS deleted some areas from leasing and recommended stipulations, especially in areas with high surface values (see Section III.B.1 for additional information on the 1983 EIS). In 1997, BLM began planning for the Northeast NPR-A, including all lands in NPR-A east of the Northwest NPR-A Planning Area. The Northeast NPR-A IAP/EIS culminated in a Record of Decision (ROD) in October 1998 that superseded the decisions of the 1983 EIS and included a decision to make 4 million acres available for oil and gas leasing. Analogous to the Northeast NPR-A plan, the Northwest NPR-A plan--to be adopted at completion of this IAP/EIS--will establish guidelines for future management of the Northwest NPR-A Planning Area and will supersede management guidelines developed under the 1983 EIS.

The NPR-A has been the subject of several studies since its creation more than a quarter century ago. Section 105(c) of the NPRPA mandated studies of the resources of the NPR-A, which were published in 1978 and 1979. In 1985, the BLM completed separate habitat and mineral evaluations of the Teshekpuk Lake Special Area (USDO, BLM, 1985a, b). Current planning draws from these previous studies and incorporates data from research and monitoring conducted since that time.

5. IAP/EIS Planning Process for Northwest NPR-A

A Notice of Intent to Plan (Notice) and a Call for Nominations and Comments (Call) that were published in the Federal Register on November 15, 2001, launched the current BLM initiative in Northwest NPR-A. The Notice and Call asked the public to help the agency identify issues and resources relevant to planning and to any potential oil and gas leasing. They also asked oil companies to identify their areas of interest within the Planning Area.

The draft IAP/EIS was released for public review and comment in January 2003. The public comment period ended April 2, 2003. Upon receiving the public's comments, BLM and MMS reviewed and updated the analyses as necessary, responded to specific comments, and prepared the final IAP/EIS, identifying a Preferred Alternative. The Preferred Alternative is a mix of elements offered under the various alternatives presented in the draft IAP/EIS with modifications based on input received during the public review period. For example, the Preferred Alternative would make the entire Planning Area available for oil and gas leasing as under Alternative A and would adopt many of the stipulations from Alternative C. Additional stipulations and required operating procedures (ROP's) were developed from comments received on the draft IAP/EIS. At least 30 days after release of this final IAP/EIS, BLM will issue a Record of Decision (ROD) finalizing its decision on future management of the Northwest NPR-A Planning Area.

Concurrent with the NEPA analysis, BLM, in cooperation with MMS, is analyzing geologic data, including massive amounts of seismic data. Should BLM determine in its ROD to hold one or more lease sales, these data will assist the Federal Government in designating oil and gas lease tracts and establishing appropriate values for acceptable bids. Substantial work on this "tract-evaluation process" would be completed before issuance of the ROD; additional analysis would be done after any lease sale to determine the acceptability of bids.

Additional management actions may be required after issuance of the ROD. For example, creation of a Special Area would require action by the Secretary, and establishment of a Wild and Scenic River (WSR) or a Wilderness Area would require Congressional action. If the ROD makes lands available for oil and gas leasing, the first sale could occur in early summer of 2004. For analysis purposes, the IAP/EIS assumes that all lands the ROD

identifies as available for leasing will be offered in this first sale. Readers should bear in mind however, that the first sale may offer only part of the lands determined to be available in the ROD. Subsequent sales could offer additional tracts for leasing as well as re-offer tracts not leased earlier. The area offered would be within the area identified in the ROD as available for leasing. The timing of the second and subsequent sales, if any, would depend in part on the response to the first sale and the results of the exploration that would follow. The BLM anticipates that this IAP/EIS will fulfill the NEPA requirements for the first sale. Before conducting each additional sale, the agency will conduct a NEPA analysis, tiering from the IAP/EIS. If the analysis in the IAP/EIS is deemed valid, the NEPA analysis for any second or subsequent sale may require only a determination of NEPA adequacy or an EA to support the ROD. If parts of the Planning Area are leased as one outcome of the IAP/EIS, additional NEPA analysis will be conducted during the permitting process for the exploration and development stages.

C. ISSUES

Through a public process, the BLM has sought to define the issues associated with the land allocation and resource protection decisions for the Northwest NPR-A (Note: For additional description of BLM's consultation and coordination efforts see Section VI). The BLM has reviewed the concerns and questions raised during public scoping and the agency has integrated solutions to many of the issues into elements of the alternatives evaluated in this IAP/EIS. In response to comments and suggestions during scoping, BLM also redrew the southern boundary of the Planning Area to allow for a more comprehensive look at the future management of the upper Colville River basin in a projected Southern NPR-A plan. The major issues addressed in the Northwest NPR-A IAP/EIS are listed here.

- *Protection of Biological Resources and Human Uses.* A common concern expressed during scoping was the impact that oil and gas activities could have on the biological resources and the primitive natural values of this area. Local residents are very concerned with these issues relative to their subsistence use (see the separate issue point below addressing subsistence). There is also a concern for the protection of raptors and migratory waterbirds that find valuable habitat in the Northwest NPR-A. Because of the Planning Area's extensive coastline and especially because of the valuable estuarine habitat afforded by its many and large bays and lagoons, there is a concern that BLM give careful consideration to potential impacts to fish and marine mammals. Commenters were also concerned with the cumulative impacts associated with extending oil and gas activities into the Northwest NPR-A, including the potential for development offshore in the Beaufort and Chukchi seas. Finally, some commenters supported, while others opposed, identifying Wild and Scenic Rivers and Wilderness Study Areas.
- *Protection of Subsistence Resources and Access.* North Slope residents urged BLM to carefully consider impacts to subsistence resources and access to those resources. They are especially concerned that oil and gas activities could affect the caribou, fish, and marine mammal populations that they depend upon for a portion of their subsistence. They are worried that oil and gas pipelines or roads may affect caribou migration, that oil spills could affect fish or marine mammals, and that shoreline development such as docks or causeways could impact marine animal migrations. North Slope residents also urged that neither oil and gas developments nor BLM's land use designations restrict their access to subsistence resources and their ability to travel between communities.
- *Provision for an Opportunity to Access Oil and Gas Resources in this Remote Area.* Some commenters expressed concern that BLM's restrictions on activities not be so restrictive as to make oil and gas development impractical. They urged that BLM, when designing protection measures, consider the short construction season in the Northwest NPR-A and the logistical problems to reach this area, as remote as it is from existing oil and gas infrastructure.