



THE WILDLIFE SOCIETY

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NE NPR-A Amendment Planning Team
Bureau of Land Management (930)
Alaska State Office
222 West 7th Avenue
Anchorage, AK 99513-7599

Dear Planning Team:

The Wildlife Society appreciates the opportunity to comment on the Northeast National Petroleum Reserve-Alaska Final Amended Integrated Activity Plan/ Environmental Impact Statement (FEIS). The Wildlife Society (TWS), founded in 1937, is an international non-profit scientific and educational association dedicated to excellence in wildlife stewardship through science and education. Our mission is to enhance the ability of wildlife professionals to conserve diversity, sustain productivity, and ensure responsible use of wildlife resources for the benefit of society. The society's membership includes over 8,000 professionals and students with expertise in all aspects of wildlife research and management.

The Northeast National Petroleum Reserve-Alaska Final Amended Integrated Activity Plan/ Environmental Impact Statement (FEIS) identifies a preferred alternative that allows oil and gas leasing on hundreds of thousands of acres of previously protected land within the northeast section of the National Petroleum Reserve-Alaska (NPR-A). This plan represents an unprecedented departure from policies that have consistently protected critical fish and wildlife habitats within the Teshekpuk Lake Special Area ever since it was designated by the Secretary of the Interior in 1977. Although Teshekpuk Lake itself will be deferred from leasing for 10 years, seven tracts ranging from 46,000 to 59,000 acres each and encompassing the entire region north of the lake will be available for leasing. This area was protected as a no-lease zone under the previous planning process that culminated in the 1998 Record of Decision. Development of this sensitive area will fragment critical calving and insect-relief habitat for the Teshekpuk Lake Caribou Herd and the most important goose molting area in the circumpolar Arctic.

Wetlands north and east of Teshekpuk Lake support tens of thousands of Pacific brant, greater white-fronted geese, Canada geese, and lesser snow geese during the flightless molt period. The area is unique and of international significance for North American and Russian populations of geese that are important to the nations of the United States, Canada, Mexico, Japan and Russia. The FEIS proposes to protect geese via a "No Surface Occupancy" zone (NSO) within the goose molting area. Inspection of FEIS Map 2-4 indicates that the NSO may be based on buffers of variable width (ranging from 1/4 mile to 1 mile) around lakes used by molting geese, but the derivation of the NSO boundary is not described, nor is there a

science-based evaluation of the effectiveness of the NSO zone in mitigating impact to molting geese.

Given what is known about the response of molting geese to disturbance, there is ample reason for concern about the effects of aircraft overflights and increases in predators likely to accompany development, and the proposed NSO zone will not substantially reduce these risks. Studies cited by the FEIS show that geese in the Prudhoe Bay oil fields were disturbed by pedestrians and boat traffic at distances of well over 1/4 mile, and brant at Teshekpuk Lake responded to helicopters at distances of several kilometers, indicating that the NSO buffer widths will be ineffective in minimizing these types of disturbance. Helicopter take-offs and landings, and overflights at intermediate heights (1550-2500' above ground level), were particularly disturbing to flightless brant. We can predict (based on data from the nearby Alpine oil field) that a Processing Facility within the goose molting area would average 18 helicopter landings and take-offs per day during the summer months, when molting geese are present. Irrespective of the NSO zone, this level of activity will undoubtedly disturb birds, and altitude restrictions cannot mitigate this effect. The FEIS fails to acknowledge this, and is vague with respect to limitations on aircraft use when molting geese are present. As further evidence of the insufficiency of the NSO zone, pipelines and roads will be allowed, and the human activity associated with these structures could have profound negative consequences for molting geese.

The BLM will offer for lease all of the insect relief and calving areas of the Teshekpuk Lake Caribou Herd in NE NPR-A. Within each of the seven proposed lease tracts north of Teshekpuk Lake, up to 300 acres of permanent surface disturbance (i.e., gravel fill) is allowed. In addition, linear features such as pipelines and roads are permitted. The resulting network of roads, pads, airstrips and pipelines could interfere with the ability of the Teshekpuk Lake Caribou Herd to migrate to and from insect relief areas. The resulting change in land protection status could also significantly reduce calving success and productivity of the herd. Experience with the Central Arctic Herd has clearly shown that parturient cows are displaced by industrial activity and structures; it is not possible to reduce or mitigate disturbance of caribou during calving; and, no evidence suggests the Teshekpuk Lake Caribou Herd can simply move to another calving area. Furthermore, the preferred alternative will force unpalatable choices between minimizing air traffic for the benefit of geese, and minimizing the road network for the benefit of caribou.

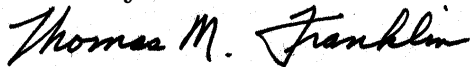
BLM's proposed performance-based stipulations and required operating procedures are intended to protect important goose molting and caribou calving habitats while providing greater flexibility for oil exploration and development. However, the effectiveness of proposed stipulations and procedures remains unknown, as does the degree to which compliance will be achieved. Consequently, the ability to mitigate potential impacts will be hampered by: (1) difficulties in measuring wildlife response and (2) the scarcity of practical options for major alterations in oil field design and operation once production is underway. In this context, the intent to open essentially the entire goose molting and caribou calving areas to leasing and development, while relying on unproven stipulations and required operating procedures, poses an unacceptable risk.

The stated intent to implement performance-based stipulations through the principles of adaptive management is undermined by the failure of the FEIS to commit to a substantial and effective monitoring program. The brief sections (p. 2-56) that describes inadequate monitoring requirements and the vague references to studies (p. 2-15) are inadequate substitutes for a comprehensive and effective monitoring plan. Further, the proposed stipulations and required operating procedures typically are couched in ambiguous terms that provide no quantifiable standard by which to measure success. Finally, the FEIS makes no commitment to structuring oil and gas activity as management “experiments” that test the effectiveness of recommended mitigation. Unless corrected, these deficiencies will prove fatal to an adaptive management regime.

TWS is unaware of any new scientific information, methods, techniques, or management recommendations nor any new technology in oil and gas exploration, development or production since the 1998 Record of Decision that will offset expected adverse effects of the Preferred Alternative (Alternative D) to molting geese, the Teshekpuk Lake Caribou Herd, and other wildlife resources. The FEIS does not present new biological information or sound science to justify any reduction in long-standing protection from leasing of this unique and irreplaceable area.

TWS recommends the BLM adopt Alternative A - the No Action Alternative. The No Action Alternative provides the greatest protection to molting geese, breeding and staging migratory birds, and the Teshekpuk Lake Caribou Herd. The BLM Preferred Alternative will result in unacceptable risks and impacts to wildlife resources. Thank you for considering the views of wildlife professionals.

Sincerely,



Thomas M. Franklin
Executive Director (Acting)

cc: The Honorable Gale Norton, Secretary of the Interior
Kathleen Clarke, Director, Bureau of Land Management
Steve Williams, Director, Fish and Wildlife Service
Pete Domenici, Chair, Senate Energy and Natural Resources Committee
Richard Pombo, Chair, House Resources Committee