ENVIRONMENTAL IMPACT STATEMENT FOR ALPINE SATELLITE DEVELOPMENT PLAN

SCOPING SUMMARY REPORT

May 2003

ENTRIX, Inc.

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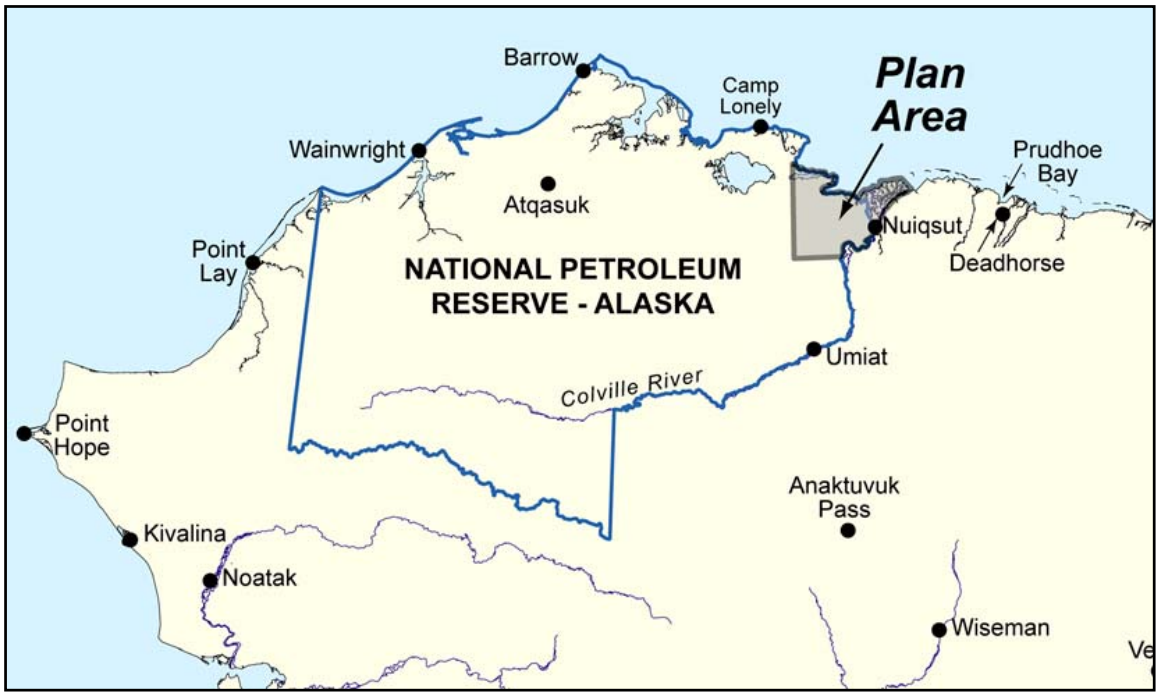
LIST OF ACRONYMS AND SYMBOLS

ASDP	Alpine Satellite Development Plan
BLM	Bureau of Land Management
CD	Colville Delta
COE	U.S. Army Corps of Engineers
CPAI	ConocoPhillips Alaska Incorporated
DEIS	Draft Environmental Impact Statement
DOI	U.S. Department of Interior
EPA	U.S. Environmental Protection Agency
IAP	Integrated Activity Plan
MMS	Minerals Management Service
NEPA	National Environmental Policy Act
NOI	Notice of Intent
NPR-A	National Petroleum Reserve-Alaska
NPRA-NE	Northeast Planning Area of National Petroleum Reserve-Alaska
NPRA-NW	Northwest Planning Area of National Petroleum Reserve-Alaska
NRC	National Resource Council
NSB	North Slope Borough
ROD	Record of Decision
TOC	Table of Contents
U.S.	United States
U.S.C.	United States Code

1. INTRODUCTION AND BACKGROUND

The Bureau of Land Management (BLM) and three cooperating agencies—U.S. Army Corps of Engineers, U.S. Environmental Protection Agency, and the State of Alaska—are preparing the Alpine Satellite Development Plan environmental impact statement (EIS) to examine potential oil and gas development of leases in the Colville Delta and the eastern National Petroleum Reserve-Alaska (NPR-A). ENTRIX, Inc., is BLM's contractor for the EIS. The EIS will analyze full-field development for the plan area shown on the map below. Included in the EIS will be an analysis of ConocoPhillip's proposal for developing five oil and gas production pads that would be satellites to its existing Alpine facility.

The EIS is being prepared in compliance with the National Environmental Policy Act (NEPA). This document summarizes the issues and concerns raised by the public during the scoping period that began on February 18, 2003, with the *Notice of Intent to Prepare an Environmental Impact Statement* published in the Federal Register. This formal scoping period ended on March 31, 2003.



2. PROPOSED DEVELOPMENT

2.1 Full-Field Development

The area the EIS is looking at encompasses approximately 890,000 acres on the North Slope of Alaska. The plan area includes most of the Colville River delta and part of the NPR-A extending about 35 miles west of the North Slope community of Nuiqsut. The EIS will analyze potential development of oil and gas resources within this plan area. Full-field development contemplates using production pads and processing facilities in addition to the existing and currently proposed pads and facilities to develop known and potential oil and gas resources in the planning area.

The ConocoPhillips proposed development is a subset of full field development and is described in the following section.

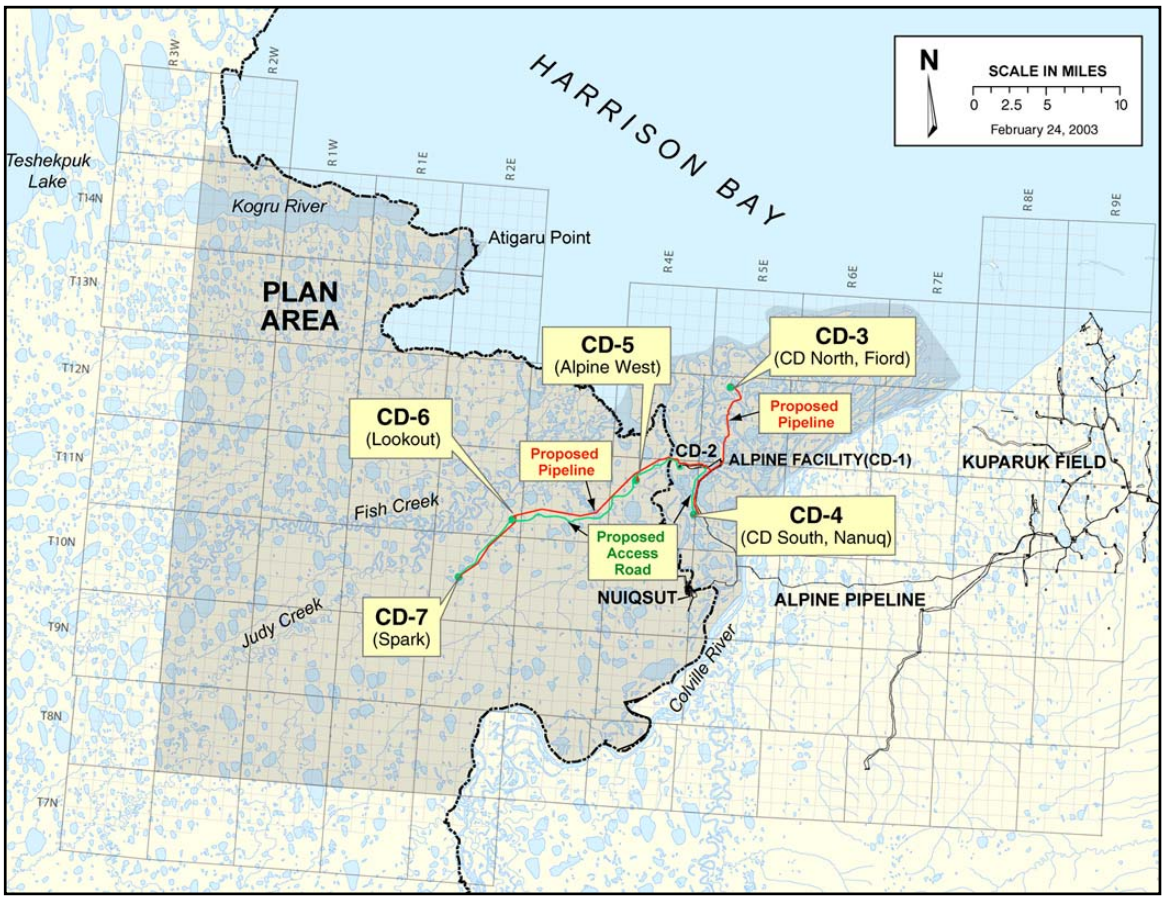
2.2 The ConocoPhillips Development Plan

ConocoPhillips proposes to develop two production pads in the Colville River delta (CD-3 and CD-4; called CD North and CD South during exploration) and three production pads in NPR-A (CD-5, CD-6 and CD-7; called Alpine West, Lookout, and Spark during exploration). All five satellites are within about 20 miles of the existing Alpine Central Processing Facility (Alpine). The satellites would send produced fluids through pipelines to the Alpine processing facility. Crude oil would travel through the Alpine and Kuparuk pipelines to the Trans Alaska Pipeline System.

Each of the satellites would consist of a single gravel pad. Four of the five sites would be connected to the Alpine Central Processing Facility by a gravel road. The road to the sites in NPR-A would include a bridge over the Colville Nigliq Channel. The fifth site CD-3 will have no access road; instead, it will have a landing strip.

Typical pad facilities for the Alpine satellites would include 20 to 30 wells, as well as equipment for lighting, heat, surveillance, and emergency power generation. ConocoPhillips would upgrade facilities at Alpine to accommodate fluids from these satellites. No significant hydrocarbon processing facilities would be located at the satellites. Most fuels and chemicals would be stored and handled at Alpine or contained in small aboveground storage tanks at the satellites.

Pipelines for the Alpine satellites would likely consist of a three-phase production line (containing oil, water, and gas), a gas line, a seawater injection line, and possibly a diesel line. The new pipelines would be built so the pipe would be a minimum of five feet above the tundra.



Gravel for the Alpine satellites would come either from an existing gravel-mine site near Nuiqsut or a new site identified in NPR-A. Ice roads would be used to haul gravel during construction. Initially, fresh water for ice roads and for operational needs would come from lakes in the area. ConocoPhillips is currently researching longer-term water sources.

All personnel would likely be based at Alpine. Personnel would man drill sites part-time and visit the sites as dictated by the activity level and spill prevention requirements. All-weather gravel roads would provide access to CD-4, CD-5, CD-6, and CD-7 and support year-round drilling. Winter-only drilling is proposed for CD-3, with operation and maintenance to be performed remotely from Alpine. Personnel would periodically visit the satellite by aircraft or ice road. ConocoPhillips does not propose any permanent camp facilities at any of the satellites. Production processing would occur at Alpine. Electrical power to the Alpine satellites would be provided by Alpine, or it would be generated on-site.

ConocoPhillips proposed to start building facilities for the Alpine satellites in the winter of 2005. Construction would take place in stages, beginning with the Colville Delta satellites (CD-3 and CD-4). Construction of the NPR-A satellites (CD-5, CD-6 and CD-7) is expected to be complete in the winter of 2010.

ConocoPhillips expects to produce the first oil from the Alpine satellites at CD-4 in the summer of 2006, with production from the other satellites coming on line over the following four years.

3. SCOPING PROCESS

This section describes the purpose of scoping, the EIS preparation team's methods of notification for the scoping meetings and presents the details of the scoping meetings.

3.1 Purposes and Notification

Scoping meetings are held to give the public an opportunity to review and comment on the ConocoPhillips proposal and the full field development within the Plan Area shown in Section 1. Scoping occurs at the very beginning of the EIS development process to provide the BLM an opportunity to explain the EIS process and identify the public opportunities to provide input and become involved in the process. Scoping gives the public an opportunity to identify issues and concerns, and make recommendations to BLM on the ConocoPhillips proposal and full-field development.

BLM published a Notice of Intent (NOI) in the *Federal Register* on February 18, 2003, announcing the intent to begin preparation of the EIS. The NOI can be found online at http://www.alpine-satellites-eis.com. Notices of public scoping meetings were published in the *Anchorage Daily News (*February 27, and March 5, 2003), *Fairbanks Daily News Miner* (March 6 and March 19, 2003), *Arctic Sounder* (March 6 and March 13, 2003), and the *Alaska Journal of Commerce* (March 9 and March 16, 2003). Public announcements were also made on radio stations in Barrow and Fairbanks. An audio summary was prepared in Inupiaq language, which was broadcast on KBRW radio in Barrow prior to the Barrow public meeting. Inupiaq language interpreter Rosie Kailegak made frequent announcements on the citizens' band radio in Nuiqsut to, in her words, "encourage the young folks to come to the meeting since they are the ones who will be affected by the development for years to come."

3.2 Scoping Meetings

BLM conducted four scoping meetings in Anchorage, Barrow, Nuiqsut and Fairbanks between March 6 and March 20, 2003.

Thursday, March 6, 2003
Anchorage, Z. J. Loussac Library, Wilda Marston Theater
(38 people signed in, six commented—one person more than once)

Monday, March 17, 2003
Barrow, North Slope Borough Assembly Chambers
(11 people signed in, 14 people were counted, 12 commented—some more than once)

Tuesday, March 18, 2003
Nuiqsut, Nuiqsut Community Center
(39 people signed in, five commented—some more than once)

Thursday, March 20, 2003
Fairbanks, Chena River Convention Center
(24 signed in, four commented; two comment sheets were returned at this meeting)

Meetings were held in the villages of Barrow and Nuiqsut due to their proximity to the proposed development. The meetings in Anchorage and Fairbanks provided an opportunity for urban residents with ties to the North Slope to comment on the proposed oil and gas development.

The sign-in sheets show 112 people attended the scoping meetings, but this figure is probably low since not everyone signed in at all the meetings. The meeting in Nuiqsut was attended by many school-age children. Each meeting was preceded by an 1.5-hour "open house" period designed to give people an opportunity to ask questions and take an in-depth look at the materials—maps, handouts, etc. —and ask questions of the planning team, agency. and applicant. For the Barrow and Nuiqsut meetings, the comment sheet and meeting agenda were translated into Inupiaq, and a translator was available at the Barrow and Nuiqsut meetings. The handouts consisted of a copy of the scoping newsletter, meeting agenda (English and Inupiat), comment sheet (English and Inupiat), and a map of the plan area showing the location of the CPAI proposed satellites, road, and pipelines.

A formal presentation was made at 7:00 p.m. followed by a formal comment period. The presentation and comments were recorded by a certified court reporter. Full transcripts from each of the meetings can be found on the Alpine Satellite Development Plan (ASDP) EIS web site at http://www.alpine-satellites-eis.com.

4. SCOPING COMMENTS SUMMARY

4.1 Number of Comments

Comments were accepted during the comment period from a variety of sources. The web site (http://www.alpine-satellites-eis.com) provided an on-line form. The ENTRIX project office address and telephone number was provided for mail and telephone comments. Scoping meeting handouts included a comment form that could be returned to the project team via fax or mail. During the scoping period, February 18, 2003 through March 31, 2003, 36 comments were received through the following media:

- Telephone 1
- Fax 5
- Online 13
- Mail 13
- Via Comment Forms 3

We received no "form letter" type comments.

4.2 Summary of Comments

The following summarizes the scoping comments received on the ASDP EIS through the media noted above. Comments are summarized in two main subject headings – 1) EIS Technical Issues and 2) EIS Process Issues.

General comments were received supporting development such as "the benefits that the Alpine Satellites would bring to this nation far outweigh the minimal and temporary impacts this development may incur" and the project "means business opportunities for Alaskan contracting and service companies." Comments urging special care or expressing concern about development contained statements such as "Oil development in the region is characterized by a trail of broken promises" or "growing gap between promise and practice on Alaska's North Slope."

4.2.1 Comments on EIS Technical Issues

Access and Transportation

- NPRA-NE stipulations said "no permanent roads."
- A commitment to roadless development except where environmentally preferable or infeasible was made in the Environmental Assessment for the Alpine development.

- Carefully explain and justify decisions on roads vs. no roads.
- Study ice conditions in Nigliq Channel to assure adequate design parameters for the bridge.
- Make sure bridge over Nigliq is high enough so it does not obstruct navigation.
- Pipe coating should be non-reflective, dull, and its effect on caribou studied.
- Roads and pipelines should be designed and constructed to "minimize the hindrance to caribou movements" (7-feet, 10-feet and 12-feet heights mentioned).
- Look at burying pipelines in the road to eliminate concerns for restricting caribou movements.
- Pipeline crossings should use horizontal directional drilling (HDD) techniques. (Gary Schultz comment)
- Investigate the difference between predicted and actual levels and effects of fixed-wing and helicopter traffic at Alpine.
- Use of both gravel pads/road and temporary ice roads is prudent and consistent with the theme of small footprint development.
- Drill pads less than 10 acres per site make a small footprint.
- Route flights to CD-3 over the bay to minimize impacts to local residents.
- Compare whether roads may be less destructive to wildlife than air traffic of the volume seen at Alpine.
- The whole CD-3 area is known critical waterfowl habitat—waterfowl are impacted by flights.
- Consider not constructing an airstrip at CD-3.
- Use Nuiqsut lands and the Nuiqsut Airstrip for a staging and transportation center (instead of the Alpine airstrip) (Gary Schultz comment)

Birds

- Consider unique wildlife – identified in the Northeast NPR-A Integrated Activity Plan/Environmental Impact Statement (IAP/EIS), particularly Spectacled Eider, long tailed ducks and other shore birds near CD-3, CD-4, CD-5, CD-6 and CD-7 areas contain high on-shore densities of King and Common Eider.
- Route flights to and from CD-3 (CD-North) over the bay to minimize impacts to nesting birds.
- Birds will nest near roads, but leave the area after months of air traffic.
- Protect endangered species.
- Colville River Delta is "vital habitat to diverse and abundant populations of waterfowl and shorebird species."
- Consider affects of the degradation and fragmentation of habitat.
- Predatory species—Glaucous Gulls, Common Raven, Jaegers—are attracted to human settlements or oilfield facilities and increasingly prey on other species—of particular concern are loss of Spectacled Eider eggs and young.
- People conducting studies of nesting birds in the area (of CD-3) tend to increase rates of predation—"they provide scent and visual markers to nests for predators."
- To control predation "never allow ravens to nest on any facility structure." Their presence is detrimental to breeding birds in the area.

- Black Brant—up to 20 percent of the entire Pacific flyway can molt in the Teshekpuk area.
- King Eider populations have declined by about 50 percent in the last 20-25 years.

Climate, Meteorology, and Air Quality

- Poor air quality may be contributing to increased asthma rates in Nuiqsut.
- What effect will global warming have on these developments?
- Do gas flares contribute to air quality changes in the community of Nuiqsut?
- Not all ecological changes are related to the oil and gas industry.

Cultural Resources

- Kuukpik Corporation strongly disagrees that impacts from full field development on Nuiqsut residents and their subsistence activities can be understood by referencing general studies conducted on the North Slope or the few data gathered on Alpine-related impacts. The concept of full field development is very different here given the proximity of the subsistence dependent community to the development and is not comparable to more remote development.
- Consider location and impacts to Native allotments, subsistence cabins, cultural sites, burial sites, et cetera.

Cumulative Impacts

- Cumulative impacts to the subsistence activities of Nuiqsut must be thoroughly addressed in the EIS.
- Cumulative impacts to hunters "excluded from traditional hunting areas" and hunting areas are "largely avoided in the vicinity of oil and gas facilities."
- Nuiqsut villagers no longer hunt to the east of the Colville River.
- Cumulative impacts to subsistence users when the "potential for increased industrialization of areas north and west of Nuiqsut to severely limit the lands now remaining available or utilized by subsistence hunters."
- Cumulative impacts to the residents of Nuiqsut experiencing "divisions regarding how best to deal with both the effects and opportunities associated with expanding industrial development and over what the community's role should be in the process. There is a need for steady cash employment, but industry jobs take residents away from their families, communities, and cultural activities and responsibilities. There have been persistent concerns over air quality and the overall effects of industrial operations on the health of residents."
- Consider cumulative impacts in the context of the National Resource Council (NRC) report "The Essential Tradeoff" that discusses the "balance between the benefits of development and the costs to the environment and people, the down side."
- Carefully review and consider the recommendations of the National Resource Council's recently released report.
- Consider that not all environmental problems facing the ecosystem are related to oil and gas development—changing weather patterns, natural fluctuations in game populations,

30 years of population growth—all factors causing change need to be considered in conjunction with oil and gas development.

- Evaluate the predicted (during Alpine planning) and actual use of resources including water, gravel and hydrology in the plan area.
- Evaluate current facility development on disruption of wildlife and subsistence—use as a "rough indicator of the reliability of such predictions" to evaluate what might be expected in the plan area.
- Cumulative impacts analysis must address the displacement of caribou from traditional calving, insect relief and hunting areas.
- Cumulative impacts must address ice road river crossings that may have restricted fish movement and may have contributed to poor fish harvests.
- Impacts to arctic environment and global warming.
- Cumulative impacts to Nuiqsut compounded "because the proposed fields are situated so close to Nuiqsut and located within our subsistence grounds."
- Staging, mobilizing and housing construction crews in Nuiqsut creates "multiple, interrelated and cumulative impacts to the community."
- Look at cumulative effects around Harrison Bay and Teshekpuk Lake as development gets closer.
- What are the effects of CD-1 and CD-2 (the existing Alpine Central Processing facility and production pad)?
- If you look at this project and the Northwest NPR-A DEIS (Map 101) this "truly is the proverbial camel's nose into the tent."
- Consider the cumulative impacts of a "multi-faceted planning process which may very well change the face of the North Slope for decades to come."
- Concerned with the "growing footprint" of oil and gas development across the Arctic—the domino effect.

Fish

- Nuiqsut concerned about contaminants in fish.
- Colville River Delta provides "extensive spawning, rearing and over-wintering habitat for more than 20 species of anadromous and freshwater fish."
- Whitefish are the most abundant and important fish resource to local subsistence users.
- Arctic Cisco declines noticed both in total harvest and catch rates.
- Regarding the Broad White Fish, or ahnalik,—"these fish have complicated lifestyle that requires use of several types of habitats: lake habitat, deep river, spawning habitat, small ephemeral streams for accessing summer feeding areas…" and this needs to be considered in the EIS.
- CD-6 should not be placed within the Fish Creek exclusion zone.

Freshwater Resources

- Ice road construction and operation water consumption is a concern with possible impacts to ecology of surrounding lakes and wetlands i.e., hydraulic interrelationships.

- Investigate the difference between predicted and actual levels and effects of water use at Alpine.

Geology and Geomorphology

- Where will the gravel in NPR-A come from?
- Has the permafrost protected us so far from contaminants injected into the soil?

Land Use

- Balance "development while still affording the most protection for our fragile and unique environment."
- Discuss impacts to wilderness "character" of area.
- Set aside bond or funds to remove abandoned oilfield infrastructure.
- Rezoning will be necessary.
- Kuukpik has additional land selections that may be made in the area.
- BLM should complete allotment transactions in the area.

Marine and Coastal Biological Resources

- Colville River is the largest river on the North Slope both in total length and watershed area.
- Protect fish and wildlife.
- Consider unique wildlife—identified in the Northeast NPR-A IAP/EIS
- Minimize activity in summer months (May 15 to September 15) to reduce impacts on wildlife.
- Support protection of endangered species.
- Protect endangered bowhead whale.

Noise

- Fixed wing and helicopter traffic to oil and gas development creates noise.
- Noise from drilling affects fisheries.

Physical Oceanography and Coastal Water Quality

- Concerned about ocean disturbances from airboats at the mouth of the Colville River.

Recreation

- Pipelines and roads limit Nuiqsut's recreational access.
- Impacts to commercial guides in the Colville River Delta.

Sociocultural

- "Inupiat have been on this land for centuries" and the oil industry is the visitor and not the Inupiat.

- The plan area includes the community of Nuiqsut, home to approximately 450 residents.
- Colville River Delta is a traditional "gathering and trading place for the Inupiat people who have also harvested the rich and varied wildlife resources of the region."
- Proximity to development creating significant change in social structure of community "haves versus have-nots."
- Years of poor subsistence harvest saw "increases to alcohol and drug abuse, domestic violence, suicide attempts and successes, and conflicts among the people."
- What do we do when the global need for energy changes activities "that have been handed down for thousands of years?"
- Local people want to continue living their subsistence way of life, but "their leaders or their corporation and their government want the lease sale."

Socioeconomics

- Oil and gas development is "inevitable and generally a good thing that brings economic benefits to our local people, the State of Alaska, and our nation."
- Development impacts commercial guides in the Colville River Delta.
- The National Petroleum Reserve-Alaska was set aside for oil development.
- Small step in addressing the Nation's energy needs.
- Kuukpik owns the surface estate for CD-4 and CD-5 and may have a financial interest in other pads as well after future land selections are completed and transferred.
- Alpine developed with close coordination with local community and regional governments.
- Proposed development would create jobs for Alaskans.
- Proposed development help offset the decline in North Slope oil and gas production.
- State of Alaska, local communities and businesses benefit from responsible resource development.
- Development would help stem declining state and local revenues, with significant near-term revenues.
- Economics should not take precedence over environmental protections.
- Information on oil volumes at the various sites should be presented.
- Development will help lessen our dependence on foreign oil.
- Community most affected by development must receive "some direct benefit from industrial development in its own back yard."
- Development provides an opportunity to improve lives and standard of living for Inupiat and general populations on Alaska's North Slope.
- Development provides opportunity for lower cost fuels for North Slope villages—commenters noted that fuel costs in Nuiqsut are higher than anywhere else in the U.S. and Nuiqsut is closer than any other town to the U.S.'s largest oil field.
- Strong comment made several times that the money from the existing developments is not getting to the village(s).
- Commenter noted that only 2 people from Nuiqsut have jobs from the Alpine development and that training is non-existent.
- North Slope Borough (NSB) lands can be a revenue stream to fund borough operations.

- Give us a prediction of how much oil and what kind of lifespan you are expecting for the field.
- Address socioeconomic impacts to "communities that are affected, impacted, and have a cumulative impact on all these things happening to them."

Spills and Safety

- Industry has proven track record for safe, responsible development in sensitive habitat areas.
- Operations generate cuttings and mud, how will these be dealt with?
- How will oil spills be handled?
- Industry has 25-year track record of safe operation.
- Would like to see faster response time with a dedicated helicopter based at Alpine.
- What effects will we see from injecting fluids into the ground?
- Adopt the North Slope Borough Science Advisory Committee's recommendations that reject the Mineral Management Service risk assessment and oil spill probability estimate methodology.

Subsistence

- Nuiqsut is the only community in the immediate vicinity of the proposed action.
- Project is detrimental to present and future traditional and cultural uses of the area
- Consider location and impacts to subsistence cabins.
- Impacts to subsistence may be underestimated if development happens too quickly--Need more time to evaluate impacts to Nuiqsut of nearby development. In the short period since the construction of Alpine, development has already had negative impacts on Nuiqsut and their subsistence resources. These impacts may increase with time. If future developments occur too quickly in the Colville Delta, they may be underestimated because there has not been enough time to assess them fairly.
- Areas around oil and gas facilities are treated as off-limits and every expansion effectively decreases the area available for subsistence activities.
- Because of nearby development, data on subsistence and cultural changes must be gathered in Nuiqsut to be meaningful.
- Elderly residents will be especially affected because they traditionally hunt near the village.
- Activities are too close to Native allotments.
- There should be no hunting restrictions in the development area.
- Pipelines and roads would be placed in hunting areas and berry picking areas important for subsistence users.
- Facilities are within historical subsistence habitat for wildfowl, caribou and to a smaller extent, moose.
- Nuiqsut residents warned of contaminants in fish—"it was suggested that we not eat more than six burbot in a year…when they did come they said go ahead and eat the fish we have other foods that have higher levels. They did not take into consideration the way

that we eat the fish, the quantities we eat and how the liver is a delicacy that is shared with the elders and children."

- Provide independent interpretation of subsistence consumption style and rates to determine true exposure to contaminants.
- Provide funding to assess the health of subsistence foods—fish, caribou, etc.
- Consider effects from industrial materials humans cannot smell but the animals can.
- Identify the hunters' travel routes and find a way to maintain and not interfere with them.
- Impact of "increase in speedy subsistence mobility" – 100 mph snowmachines, inboard jet boats on the Colville River.
- Because of reduced population of animals or animals avoiding development, subsistence hunters need to travel farther to get animals, adding to the inherent dangers of subsistence hunting.

Terrestrial Wildlife

- Concern about impacts to polar bear denning.
- Compounding the problem of a reduced area for subsistence is the avoidance phenomena exhibited by caribou around oil and gas facilities, roads and pads. The economic impact of being forced to travel farther should not be overlooked.
- The effects of obstacles (roads, pipelines) may be greater on caribou near the edge of their normal migratory range.
- Look at burying pipelines in the road to eliminate concerns for restricting caribou movements.
- In recent years, there has been a reduction in the number of caribou in the Colville River Delta.
- Extension of the pipeline and road corridors within the Delta may act to corral the caribou or may stress the caribou through deflection or delayed movements.
- The pipelines may have a visual impact on caribou movements. Reflective v. burnished pipe must be studied.
- Additional data needs to be collected on snow cover and drifted snow related to facilities that may obstruct the movement of both caribou and subsistence hunters (ability to pass under pipelines on snowmachines).
- CD-6 and CD-7 are within calving area for Teshekpuk Lake caribou herd.
- Protect endangered terrestrial species.
- Caribou migration changes—"caribou have not migrated through the village [Nuiqsut] in three years when it is part of why we live here."
- Designate special areas on and off shore as protected polar bear habitats.
- Update polar scientific data to replace data that is dated, sparse and sometimes contradictory.
- Consider the degradation and fragmentation of habitat.
- Predatory species—foxes and bears—are attracted to human settlements and oilfield facilities, increasing predation on other species.
- Special care should be taken on the western side of the plan area to not restrict caribou movements.

Traditional Knowledge

- Integrate traditional knowledge into EIS process.
- Talk to Nuiqsut residents and weigh their input greater than others.
- Project is detrimental to present and future traditional and cultural uses of the area.

Visual and Aesthetic Characteristics

- Pipeline coating should be non-reflective.
- Do not want to see powerline poles stretching across the development area—suspend them on the vertical support members or bury them in the roads, if roads are constructed.
- Development should be "as small and unobtrusive as possible."

Wetlands and Vegetation

- Advances in technology reduce development footprint, consolidate facilities and preserve more acreage for habitat.
- Drill pads less than 10 acres per site make a small footprint.
- Use of both gravel pads/road and temporary ice roads is prudent and consistent with the theme of small footprint development.

4.2.2 Summary of Comments on the EIS Planning Process

Purpose and Need for the Proposed Development

- Oil and gas development is "inevitable and generally a good thing that brings economic benefits to our local people, the State of Alaska, and our nation."
- Kuukpik owns the surface real estate for CD-4 and CD-5 and may have a financial interest in other pads as well after future land selections are completed and transferred.
- State of Alaska, local communities and businesses benefit from responsible resource development, development with help by providing significant near-term revenues.
- NSB lands can be a revenue stream to fund borough operations.
- Proposed development would create jobs for Alaskans.
- Proposed development could help offset the decline in North Slope oil production.

Purpose and Need for EIS

- Balance "development while still affording the most protection for our fragile and unique environment."
- The National Petroleum Reserve-Alaska was set aside for oil development.
- Impacts to the residents of Nuiqsut because of "divisions regarding how best to deal with both the effects and opportunities associated with expanding industrial development and over what the community's role should be in the process. There is a need for steady cash employment, but industry jobs take residents away from their families, communities, and cultural activities and responsibilities. There have been persistent concerns over air quality and the overall effects of industrial operations on the health of residents."

- Kuukpik owns the surface real estate for CD-4 and CD-5 and may have a financial interest in other pads as well after future land selections are completed and transferred.
- Economics should not take precedence over environmental protections.

EIS Process, Schedule, and Public Involvement

- Any exceptions to requirements stemming from the Northeast NPRA IAP/EIS should apply only to the five satellites currently proposed by CPAI. No exceptions should be made to allow full field development.
- Nuiqsut needs objective and independent technical guidance and advice to review and comment on the EIS.
- Commenters in Anchorage, Barrow and Nuiqsut indicated a need to have more time to review and comment.
- Agencies must determine how much project modification will be allowed for future developments, within the plan area, without supplemental EIS analysis.
- Project engineering is not complete—design changes may occur as the EIS is underway.
- Need comprehensive planning by BLM and other federal and state agencies, in partnership with the NSB and potentially affected communities to identify the scope, intensity, direction and consequences of development.
- Will there be additional meetings after completion of CD-3 and CD-4? Consider separate hearings in Nuiqsut before development of CD-5, CD-6 and CD-7.
- Let the "villages get together or their designees and then work this out right."
- Concerns should be "more about subsistence use and the people that live on the land and not just the animals that live on the land."
- The suggestion that BLM has switched to the full field approach in response to community concerns that large development projects were being permitted on a "piecemeal" basis is disingenuous.
- A full field development EIS is being attempted to streamline future development permitting and minimize future NEPA requirements. Accelerating the pace of development will reduce community input on decision-making and the opportunity to closely and carefully monitor impacts to subsistence.
- The EIS should analyze full-field development of a plan area larger than the area encompassed by the CPAI proposal. A maximum development scenario should be considered because development "for too long has been conducted in a piece-meal fashion with a severe underestimation of the associated impacts or footprint."
- EIS should not be used to undo protections provided by Northeast NPR-A IAP/EIS
- Full field development approach was announced in the *Federal Register* prior to any consultation with Kuukpik or KSOP.
- Calling the EIS the Alpine Satellite Development Plan is very misleading. Full field development is really multi-field development because many of the locations will be more than 25-30 miles from Alpine, thus too far to be considered satellites.
- Full field development should be considered under Cumulative Effects within the NEPA framework not as part of the proposed action and alternatives. This is fitting with the spirit and purpose of NEPA.

- If there isn't another EIS after this development, it will be much more difficult to implement what is learned from CD-5, CD-6 and CD-7.
- Full field development is contrary to 16 U.S.C. 3112(1) and the provisions of 42 U.S.C. 6508. The Michael Gold decision does not support the full field approach in a case such as this.
- Statutes do not address speed or efficiency in obtaining permits, rather they emphasize the least impact possible on rural residents who depend on the subsistence resources.
- The Table of Contents (TOC) for the ASDP EIS should be based on the NPRA NE EIS TOC, not the NPRA NW TOC.

Development of Alternatives and Mitigation Measures

- The EIS should analyze full-field development of a plan area larger than the area encompassed by the CPAI proposal. The full-field development should include "the maximum foreseeable level of development…envision an additional 5-10 production sites, processing facilities, additional roads, pipelines, airstrips, minesites, water use sites, ice road corridors and concurrent exploration activity within the area and beyond. …high levels of aircraft traffic, vehicle traffic, water use and noise. …vastly increased amounts of activities and facilities." "…envision along with these vastly increased amounts of activities…" corresponding impacts to the effected environment.
- Develop a true "no action" alternative.
- Support continuing studies of oil and gas development effects.
- Commenters noted that more long-term monitoring is needed to more effectively tell what actually happens and that mitigation needs to be modified as results from those long-term studies reveal the "true" impacts.
- Advances in technology reduce development footprint, consolidate facilities and preserve more acreage for habitat.
- Development must meet stringent environmental and safety standards
- Provide mitigation to local community including: financial support, employment and training, hazardous materials documentation, geographic response strategies; river, stream and lake set-backs; above ground pipelines raised to 10-feet; community involvement; and continuing studies of wildlife, subsistence and socio-culture issues.
- Concerned with tendency of BLM to "break promises" regarding development limitations and lease stipulations.
- Base stipulations on sound science and fact.
- Apply "strictest" environmental standards to development.
- Scientific studies and applicable research should be used as the basis for public policy recommendations and management decisions.
- Support for imposing maximum mitigation measures at CD-3 to protect critical waterfowl habitat—completely halt aircraft usage in the summer months.
- Development should be "as small and unobtrusive as possible."
- EIS process needs to give the Nuiqsut residents "greater weight than the comments from anybody else…people in Nuiqsut are risking the most from this development."
- Mitigation measures should include training programs and jobs for North Slope residents

Cost should not be determinative as noted in the Michael Gold case.