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U.S. Fish and Wildlife Service

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Coastal Plain Oil and Gas Leasing Program Supplemental Environmental Impact Statement

FINAL

Volume 1: Chapter 1 through 4, References, Glossary

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U.S. Department of the Interior
Bureau of Land Management
U.S. Fish and Wildlife Service

In Cooperation with:

Native Village of Kaktovik
Iñupiat Community of the Arctic Slope
Native Village of Venetie Tribal Government
Venetie Village Council
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Environmental Protection Agency
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United States Department of the Interior



BUREAU OF LAND MANAGEMENT
U.S. FISH & WILDLIFE SERVICE

Dear Reader:

We are pleased to present the Coastal Plain Oil and Gas Leasing Program Final Supplemental Environmental Impact Statement (Leasing SEIS) in accordance with the National Environmental Policy Act (NEPA) as amended. The Leasing SEIS was developed by the Bureau of Land Management (BLM) and United States Fish and Wildlife Service (USFWS) as joint lead agencies to address deficiencies in the previous NEPA analysis in the 2019 Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS) and the 2020 Record of Decision (ROD) approving the Arctic National Wildlife Refuge Coastal Plain Oil and Gas Leasing Program (85 *Federal Register* 51754).

The joint lead agencies have prepared this Leasing SEIS in accordance with NEPA to implement an oil and gas leasing program in the Coastal Plain of the Arctic National Wildlife Refuge. This Leasing SEIS serves to inform BLM's implementation of the Public Law (PL) 115-97, Section 20001(c)(1), requirement to hold two lease sales of at least 400,000 acres each by December 22, 2024. It also informs management of on-the-ground oil and gas activities, including seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain.

The Leasing SEIS considers and analyzes the environmental impacts of four action alternatives for implementation of an oil and gas program in the Coastal Plain, including the areas to offer for sale, and the indirect impacts that could result in consideration of hypothetical development. The joint lead agencies have identified Alternative D2 as the preferred alternative. All action alternatives, including the preferred alternative, were designed to meet Section 20001 of PL 115-97 and to account for all purposes of the Arctic National Wildlife Refuge. This Leasing SEIS does not in itself authorize on-the-ground oil and gas exploration or development activities; it evaluates which lands will be offered for lease and the terms and conditions to be applied to leases and on-the-ground oil and gas activities. Future on-the-ground actions requiring BLM approval, including proposed exploration plans and development proposals, would require further NEPA analysis based on the project-specific proposal.

Although Section 20001(a)(2) and (b)(2)(A) of PL 115-97 assigns responsibility to the BLM for administering the oil and gas program, it is understood that all activities, including plan development, study development, and consideration of exceptions, modifications, waivers, or any operations that will be conducted on the surface of the Coastal Plain would include close coordination with the USFWS to ensure that its considerations as the surface management agency would be taken into account. In addition, the BLM would coordinate with other appropriate federal, state, and North Slope Borough (NSB) agencies, Tribal Governments, Alaska Native Claims Settlement Act (ANCSA) corporations, and other Native organizations as appropriate.

The analysis of alternatives presented in this Leasing SEIS is informed by the public input gathered from the 60-day public scoping period and the extended 60-day comment period on the Draft Leasing SEIS. The joint lead agencies held in-person public meetings in Utqiagvik, Venetie, Arctic Village, Fort Yukon, Anchorage, and Fairbanks. In conjunction with the Draft Leasing SEIS public meetings, the BLM held subsistence hearings in Utqiagvik, Venetie, Arctic Village, and Fort Yukon, pursuant to Section 810(a) of the Alaska National Interest Lands Conservation Act (ANILCA). Four virtual public meetings were also held during the public comment period. An ANILCA 810 hearing was also held in Kaktovik on March 21, 2024, after the close of the public comment period. The joint lead agencies received written comments by hard copy mail, email, online comments from ePlanning, as well as handwritten and verbal testimony at public meetings. Modifications to the Draft Leasing SEIS were made based on public comment, cooperating agency coordination, Tribal and ANCSA corporation consultation, and the joint lead agencies' internal reviews of the Draft Leasing SEIS. Consistent with 43 Code of Federal Regulations 1503.4, the joint lead agencies reviewed all comment submissions received during the Draft Leasing SEIS public comment period and evaluated all substantive comments. Responses to substantive comments are provided in Appendix T.

The Leasing SEIS may be accessed on the project website at <https://eplanning.blm.gov/eplanning-ui/project/2015144/510>. To request a digital copy, please contact the BLM and USFWS Project Management Team:

- Serena Sweet, BLM Project Manager at (907) 271-4543
- Stephanie Kuhns, BLM Project Manager at (907) 271-4208
- Bobbie Jo Skibo, USFWS Project Manager at (907) 441-1539

Individuals in the United States who are deaf, blind, hard of hearing, or have a speech disability may dial 711 (TTY, TDD, or TeleBraille) to access telecommunications relay services for contacting Ms. Sweet or Ms. Skibo. Individuals outside of the United States should use the relay services offered within their country to make international calls to the point-of-contact in the United States.

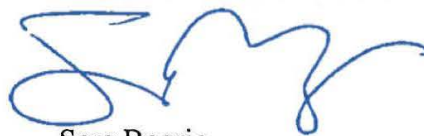
A Record of Decision will be issued no sooner than 30 days after publication of the Leasing SEIS Notice of Availability in the *Federal Register*.

Thank you for your continued interest in the Coastal Plain Oil and Gas Program Leasing SEIS. We appreciate the information and suggestions you contributed to the planning process.

Sincerely,



Steven M. Cohn
BLM Alaska State Director



Sara Boario
USFWS Alaska Regional Director

Coastal Plain Oil and Gas Leasing Program Final Supplemental Environmental Impact Statement

Joint Lead Agencies: United States (US) Department of the Interior (DOI), Bureau of Land Management (BLM) and US Fish and Wildlife Service (USFWS)

Cooperating Agencies: US Environmental Protection Agency, State of Alaska, Iñupiat Community of the Arctic Slope, Native Village of Kaktovik, Native Village of Venetie Tribal Government, Venetie Village Council, and the Arctic Village Council

Proposed Action: In accordance with Section 20001 of Public Law 115-97 (PL 115-97), establish and administer a competitive oil and gas program for leasing, developing, producing, and transporting oil and gas in and from the Coastal Plain in the Arctic National Wildlife Refuge (Arctic Refuge; <https://www.fws.gov/refuge/arctic/about-us>).

Abstract: The BLM will implement an oil and gas leasing program for the Coastal Plain in the Arctic Refuge, as required by PL 115-97. This Coastal Plain Oil and Gas Leasing Program Supplemental Environmental Impact Statement (Leasing SEIS) will inform the BLM's implementation of PL 115-97, Section 20001(c)(1), which requires the BLM to hold not fewer than two oil and gas lease sales.

In the Leasing SEIS, the BLM considers four action alternatives. Alternatives B, C, D, and D2 propose a range of the extent of the Coastal Plain that would be available for lease sale—from 26 to 100 percent of the 1.56 million-acre Coastal Plain—while balancing the five statutory purposes of the Arctic Refuge. These alternatives include lease stipulations and required operating procedures (ROPs) designed to mitigate impacts on resources and their uses. Alternative B offers the opportunity to lease the entire program area, and there would be the fewest acres with no surface occupancy stipulations. Alternative B mirrors the BLM's preferred alternative from the 2019 EIS. Alternative C would make portions of the Coastal Plain unavailable for lease sale to protect biological and ecological resources and would use the same lease stipulations and ROPs as Alternative D1 from the 2019 EIS to mitigate impacts on resources. Alternative D includes a new suite of lease stipulations and ROPs and includes considerations for climate change impacts and coordination with local communities to help ensure protections for public health, safety, and the environment. In response to cooperating agency input and public comment on the Leasing Draft SEIS, the joint lead agencies developed Alternative D2. Alternative D2, the preferred alternative, offers the statutory minimum of 400,000-acres for a second lease sale within the northwest portion of the program area with the highest hydrocarbon potential, while providing protection for key resources. The No Action Alternative, Alternative A, does not meet the purpose and need of the SEIS but is included to provide a baseline for comparative analysis. Alternative C and D2 from the 2019 EIS were not carried forward for analysis in the SEIS.

In the Leasing SEIS, the BLM considered and analyzed the environmental impact of these various leasing alternatives, including the areas to offer for sale, and the indirect impacts that could result in consideration of the hypothetical development scenario. These include potential effects from future on-the-ground oil and gas activities on climate and meteorology, air quality, noise, physiography, geology and minerals, petroleum resources, paleontological resources, sand and gravel, soil, water, solid and hazardous waste, vegetation and wetlands, wildlife, landownership and uses, cultural resources, subsistence uses and resources, sociocultural systems, environmental justice, recreation, visual resources, special designations (including marine protected areas, water bodies eligible and suitable for designation as Wild and Scenic

Rivers, and wilderness characteristics, qualities, and values), transportation, public health, and the economy.

For further information: Contact Serena Sweet of the BLM at (907) 271-4543, Stephanie Kuhns of the BLM at (907) 271-4208, or Bobbie Jo Skibo of the USFWS at (907) 441-1539, or visit the Leasing SEIS website at <https://eplanning.blm.gov/eplanning-ui/project/2015144/510>.

Executive Summary

INTRODUCTION

The Bureau of Land Management (BLM) and United States Fish and Wildlife Service (USFWS) as joint lead agencies, have prepared this supplemental environmental impact statement (hereafter Leasing SEIS) in accordance with the National Environmental Policy Act of 1969, as amended (NEPA), to address deficiencies in the previous NEPA analysis in the 2019 Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement and the 2020 Record of Decision (ROD). The BLM issued the Final Coastal Plain EIS in 2019 and signed a ROD for the leasing program on August 17, 2020 (85 *Federal Register* 51754).

The 2020 ROD approved a program to implement Section 20001 of Public Law (PL) 115-97—or the Tax Act—(December 22, 2017), directing the BLM to manage the oil and gas leasing program in the Coastal Plain. The Tax Act also requires the BLM to hold two lease sales of at least 400,000 acres each by December 2024. Following issuance of the 2020 ROD, the BLM conducted its first lease sale in the Coastal Plain on January 6, 2021, and a total of nine tracts in the Coastal Plain were leased. Secretarial Order (SO) 3401 (June 1, 2021) placed a temporary pause on leasing program activities in the Coastal Plain and the Principal Deputy Assistant Secretary for Land and Mineral Management issued lease suspension letters to the lessees. The Secretary of the Interior’s review of the 2019 EIS detailed in Secretarial Order 3401 identified multiple legal deficiencies in the underlying record supporting the leases, including, but not limited to: (1) insufficient analysis under NEPA, including failure to adequately analyze a reasonable range of alternatives in the EIS; and (2) failure in the August 17, 2020, ROD to properly interpret Section 20001 of the Tax Act. Two leases were subsequently cancelled at the lessees’ request. On September 6, 2023, the Deputy Secretary of the Interior issued a decision cancelling the remaining seven oil and gas leases due to pre-leasing legal deficiencies. There are currently no leased tracts within the program area.

The Coastal Plain program area is composed of approximately 1,563,500 acres in the approximately 19.3-million-acre Arctic Refuge (**Map 1-1**, Program Area, in **Appendix A**). The oil and gas leasing program must consider and balance the Arctic Refuge purposes set out in Section 303(2)(B) of Alaska National Interest Lands Conservation Act (ANILCA), as amended by Section 20001 of PL 115-97.

Section 20001 of PL 115-97 requires the Secretary of the Interior, acting through the BLM, to establish and administer a competitive oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain area within the Arctic Refuge. The Leasing SEIS will serve to inform the BLM’s implementation of PL 115-97, Section 20001(c)(1), i.e., the requirement to hold a second lease sale by December 22, 2024. This Leasing SEIS evaluates which lands to offer to lease and what terms and conditions to apply to those leases and oil and gas activities; it does not in itself authorize on-the-ground exploration or development. Future on-the-ground actions requiring BLM approval, including potential exploration and development proposals, would require further NEPA analysis based on the project-specific proposal.

The BLM developed the revised hypothetical development scenario in recognition of not only the rights granted by an oil and gas lease but also PL 115-97’s direction to the Secretary to “manage the oil and gas

program in the Coastal Plain in a manner similar to the administration of lease sales under the Naval Petroleum Reserves Production Act of 1976 (including regulations).”

The hypothetical development scenario has been revised to address the legal deficiency related to the 2,000-acre interpretation, whereby all alternatives in the 2019 EIS were analyzed as having 2,000 acres of surface disturbance. The original assumptions have been revised to be applied proportionally across the new range of Leasing SEIS alternatives to estimate the number of acres that could be developed under each alternative.

PURPOSE AND NEED

Purpose: The joint lead agencies have undertaken this Leasing SEIS to inform the BLM’s administration of the oil and gas leasing program in the Coastal Plain consistent with PL 115-97. **Need:** Section 20001 of PL 115-97 requires the Secretary of the Interior, acting through the BLM, to establish and administer a competitive oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain area within the Arctic Refuge. Further, Section 20001(c)(1) of PL 115-97 requires that at least two lease sales be held by December 22, 2024, and that each sale offer for lease at least 400,000 acres of the highest hydrocarbon potential (HCP) lands within the Coastal Plain, allowing for up to 2,000 surface acres of federal land to be covered by production and support facilities.

Any oil and gas program alternative must consider all five statutory purposes of the Arctic Refuge, none of which are superseded by any other. Purposes of the Arctic Refuge and their association throughout the SEIS are presented in Section 1.5.1 (**Table 1-2**).

Decisions to Be Made: The BLM’s decisions will include which tracts of land to offer for lease and the terms and conditions to be applied to such leases and subsequent authorizations for oil and gas activities. The decisions evaluated in this Leasing EIS and its record of decision (ROD) would not authorize any on-the-ground activity associated with the exploration or development of oil and gas resources on the Coastal Plain. The Tax Act requires at least 400,000 acres be offered at each of the required sales of “areas that have the highest potential for the discovery of hydrocarbons” (PL 115-97, Section 20001(c)(1)).

The USFWS continues to manage all federal lands in the Coastal Plain as part of the Arctic Refuge, including both potential leased and unleased areas; however, the BLM manages all aspects of the oil and gas program, including issuing and administering oil and gas leases and issuing permits for all oil and gas activities.

Although Section 20001(a)(2) and (b)(2)(A) of PL 115-97 assigns sole responsibility to the BLM for administering the oil and gas program, it is understood that all activities, including plan development, study development, and consideration of exceptions, modifications, waivers, or any operations that will be conducted on the surface of the Arctic National Wildlife Refuge would include coordination with the USFWS to ensure that its considerations as the surface management agency are taken into account. In addition, the BLM would coordinate with other appropriate federal, state, and North Slope Borough (NSB) agencies, Tribal governments, Alaska Native Claims Settlement Act corporations, and other Native organizations as appropriate.

PROGRAM AREA

The USFWS is the predominant land manager in the program area. Other lands in the Coastal Plain include Alaska Native lands conveyed pursuant to the Alaska Native Claims Settlement Act (ANCSA) and Native allotments (see **Table ES-1**).

Table ES-1
Land Administration Included in PL 115-97 Coastal Plain

Subject to the BLM's Oil and Gas Leasing Authority	Acres	Outside the BLM's Oil and Gas Leasing Authority	Acres
USFWS-managed lands, including submerged lands	1,562,600	Native-conveyed	24,400
Native allotment	900	Native-selected	4,400
Total	1,563,500	Total	28,800

Source: BLM and USFWS GIS 2022

Note: Acreages are rounded to the nearest 100.

The Coastal Plain program area is referred to as the 1002 Area. The program area includes all federal lands and waters comprising approximately 1,563,500 acres of the Coastal Plain within the 19.3 million-acre Arctic National Wildlife Refuge.

The program area excludes a northern coastal portion of Air Force-administered lands near Kaktovik. As subsurface mineral interest owner, the BLM may lease subsurface of allotments; however, allotment holders retain ownership of the surface. Lands outside the BLM's oil and gas leasing program authority are those lands excluded from the definition of the Coastal Plain in PL 115-97, Native conveyed lands, and Native-selected lands.

As acknowledged by PL 115-97, State selection rights under the Alaska Statehood Act to approximately 20,000 acres in the northwest portion of the Coastal Plain are the subject of a pending lawsuit filed by the State of Alaska in the U.S. District Court of Alaska (*State of Alaska v. Department of the Interior*; Docket No. 3:22-cv-00078-SLG). The US currently owns and manages this land.

The Arctic National Wildlife Range was established in 1960 by Public Land Order 2214 "For the purpose of preserving unique wildlife, wilderness and recreational values. The USFWS would continue management of these lands under the guidance of its current comprehensive conservation plan (CCP) (USFWS 2015a) and any amendments thereto. The BLM does not have authority to enter into cooperative agreements for co-management of surface resources in the Arctic Refuge; surface lands are not BLM-managed lands under the Federal Land Policy and Management Act (FLPMA) Section 307(b).

SCOPING AND ISSUES

The BLM conducted formal scoping for the Leasing SEIS following publication of a Notice of Intent in the *Federal Register* on August 4, 2021. In September 2021, the BLM held six virtual public scoping meetings. Oral comments were captured by a court reporter at all meetings. The BLM formally accepted scoping comments through October 4, 2021. The USFWS was not yet confirmed as a joint lead agency during the SEIS public scoping period. Chapter 1 contains details of key issues, issues outside the scope of the Leasing SEIS, and dismissed issues identified during scoping.

DRAFT SEIS PUBLIC COMMENTS

The US Environmental Protection Agency (EPA) published the Notice of Availability of the Draft SEIS in the *Federal Register* on September 8, 2023, initiating a 45-day public comment period. In response to public comments received, the comment period was extended an additional 15 days to November 7, 2023, for a total of 60 days. In September and October 2023, the joint lead agencies held public meetings to receive comments on the Draft SEIS. Public meetings were held in Utqiagvik, Venetie, Arctic Village, Fort Yukon, Anchorage, and Fairbanks. In conjunction with the Draft SEIS public meetings, the BLM held subsistence hearings in Utqiagvik, Venetie, Arctic Village, and Fort Yukon, pursuant to Section 810(a) of ANILCA. An ANILCA 810 hearing was also held in Kaktovik on March 21, 2024.

A total of 112,963 comment letter submissions were received; 792 of which were considered unique submissions and 112,171 were part of form letter campaigns. Overall, more than 1,807 substantive comments were identified. The BLM will not issue its decision on the leasing program, called the ROD, until at least 30 days after the EPA publishes the Notice of Availability of this Final SEIS in the *Federal Register*.

ALTERNATIVES

Alternative A—No Action Alternative

Under Alternative A, the No Action Alternative, no federal minerals in the Coastal Plain would be offered for future oil and gas lease sales after the ROD for this Leasing SEIS has been signed. Alternative A would not comply with the directive under PL 115-97 to establish and administer a competitive oil and gas program for leasing, developing, producing, and transporting oil and gas in and from the Coastal Plain in the Arctic Refuge and to hold at least two lease sales (total) by December 22, 2024. It also would not meet the purpose of the Arctic Refuge to provide for an oil and gas program in the Coastal Plain, set out in Section 303(2)(B)(v) of ANILCA. Under this alternative, current management actions would be maintained, and resource trends are expected to continue, as described in the Arctic Refuge Revised CCP (USFWS 2015a).

Alternative A would not meet the purpose and need of the action, which is the BLM's implementation of PL 115-97, including the requirement to hold not fewer than two lease sales and to permit associated oil and gas activities; however, Alternative A is being carried forward for analysis to provide a baseline for comparing impacts under the action alternatives, as required by the CEQ NEPA regulations.

Alternative B

Alternative B uses the same lease stipulations and ROPs as Alternative B from the 2019 EIS, with minor edits where appropriate (BLM 2019). This alternative would offer the opportunity to lease the entire program area with the fewest acres with NSO stipulations; however, it would provide additional protections in the form of other lease stipulations and ROPs that would apply to oil and gas activities to reduce potential impacts. An estimated 2,000 acres of surface disturbance would occur under Alternative B. Once 2,000 acres of disturbance are reached, then no additional disturbance would be allowed pursuant to Section 20001(c)(3) of the Tax Act (see **Appendix C**). Seismic exploration would be allowed to occur across the entire program area. Areas of the Coastal Plain that would be available for lease sale and applicable stipulations under Alternative B are shown in **Map 2-1**, Alternative B, and **Map 2-2**, Alternative B, Lease Stipulations (**Appendix A**).

Alternative C

Alternative C includes the same lease stipulations and ROPs as Alternative D1 in the 2019 EIS, with minor edits where appropriate (BLM 2019). Land within the program area that would be available for lease sale and applicable stipulations are shown in **Map 2-3**, Alternative C, and **Map 2-4**, Alternative C, Lease Stipulations. As compared to Alternative D in the 2019 EIS, the key changes under this alternative for the Leasing SEIS include the following: seismic exploration would only be allowed in areas available for lease sale, and the reasonably foreseeable development-estimated total area of surface disturbance would be 1,464 acres (a reduction of 536 acres) (see **Appendix C**). Under Alternative C, portions of the Coastal Plain would not be available for lease sale (**Table 2-1**). In addition, a large portion of the area available for lease sale would be subject to NSO stipulations. In some instances, more prescriptive ROPs are analyzed under Alternative C than under Alternative B.

Alternative D

Alternative D addresses the NEPA deficiency identified by the Secretary in SO 3401 regarding the failure of the 2019 EIS (BLM 2019) to adequately analyze a reasonable range of alternatives and is derived from Alternative D2 in the 2019 EIS. This new alternative incorporates more protective lease stipulations and ROPs than any alternative previously analyzed, has the most acres with NSO stipulations, and stresses protection of the four conservation-orientated statutory purposes of the Arctic Refuge. Alternative D also includes considerations for climate change impacts through facility location and construction, and coordination with local communities to help ensure protections for public health, safety, and the environment. In considering where to apply NSO stipulations, the joint lead agencies took into account the use of horizontal extended reach drilling, which can extend up to 6 or more miles from the surface drilling location. Alternative D was developed collaboratively by joint lead agency specialists, with input from cooperating agencies, and traditional knowledge from Tribal governments. Alternative D meets the legal requirements to conduct a second lease sale as required by Section 20001(c)(1) of the Tax Act. The RFD estimates that the total area of surface disturbance under Alternative D would be 1,040 acres (see **Appendix C**). Additionally, seismic exploration would only be allowed in areas available for lease sale. Areas of the Coastal Plain that would be available for lease sale and applicable stipulations for Alternative D are shown in **Map 2-5**, Alternative D, and **Map 2-6**, Alternative D, Lease Stipulations.

Alternative D2 (Preferred Alternative)

In response to cooperating agency input and public comments on the Draft Leasing SEIS, the BLM and USFWS developed Alternative D2, a variation on Alternative D, making available the Tax Act's statutory minimum acreage of 400,000 acres for a second lease sale in the northwest portion of the program area that has the highest potential for the discovery of hydrocarbons. This includes, in part, the area previously covered by the seven oil and gas leases cancelled by the Deputy Secretary of the Interior on September 6, 2023, and therefore, now potentially available for future lease sale. Lands in the medium and low hydrocarbon potential areas are closed to leasing under this alternative (which are closed to leasing under the No Action Alternative). The RFD estimates the total area of surface disturbance under Alternative D2 would be 995 acres, the lowest of the four action alternatives (see **Appendix C**). Seismic exploration would only be allowed in areas available for lease sale. Areas of the Coastal Plain that would be available for lease sale and applicable stipulations for Alternative D2 are shown in **Map 2-7**, Alternative D2, and **Map 2-8**, Alternative D2, Lease Stipulations (**Appendix A**).

HYPOTHETICAL DEVELOPMENT SCENARIO

The BLM developed a hypothetical development scenario for oil and gas exploration, development, production, and abandonment in the PL 115-97 Coastal Plain. This hypothetical development scenario projects the reasonably foreseeable oil and gas exploration, development, production, and abandonment/reclamation over the expected life of the program. Of the approximately 1,563,500 acres of federal land in the Coastal Plain, an estimated 427,700 acres are projected to have high potential for petroleum resources, 658,500 acres have medium potential, and 477,200 acres have low potential. The hypothetical baseline scenario assumes all potentially productive areas can be open under standard lease terms and conditions, except those areas outside the BLM's oil and gas leasing authority. This unconstrained scenario represents the maximum level of development that could occur in the program area with no management restrictions except those mandated by law. **Appendix C** contains a more detailed description of these activities and the resources that would be required under each phase.

The BLM used the unconstrained hypothetical development scenario for each alternative, based on differing terms and conditions relating to environmental protection. It did this so that it could analyze a range of impacts on resources. Section 20001(c)(3) of PL 115-97 states that the Secretary shall authorize up to 2,000 surface acres of federal land on the Coastal Plain to be covered by production and support facilities during the term of the leases (see **Section 1.9.1**). **Table ES-2**, below, shows the hypothetical projected facilities and the associated surface disturbance estimates by alternative that would occur after applying discretionary management decisions.

The program area contains an estimated mean of 7.69 billion barrels of technically recoverable oil and 7.04 trillion cubic feet (TCF) of technically recoverable natural gas (Attanasi 2005). Due to high costs associated with operating in the Arctic, it is extremely unlikely that all technically recoverable resources would be produced. The US Energy Information Administration estimated that a total mean of approximately 3.4 billion barrels of oil (BBO) would be produced in the Arctic Refuge by 2050 (Van Wagner 2018). Estimated natural gas production from the Coastal Plain ranges from 0 to 7 TCF of gas produced (Attanasi 2005). See **Appendix C** for more information on development potential, assumptions behind potential estimates, and estimates for the baseline future hypothetical development scenario for petroleum.

Table ES-2
Hypothetical Projected Facilities and Estimated Surface Disturbance by Action Alternative¹

Facility Type	Alternative B		Alternative C		Alternative D		Alternative D2	
	Number of Potential Facilities	Estimated Acres of Disturbance	Number of Potential Facilities	Estimated Acres of Disturbance	Number of Potential Facilities	Estimated Acres of Disturbance	Number of Potential Facilities	Estimated Acres of Disturbance
CPF, airstrip, anchor well pad, and other associated service facilities	4	200	2	100	1	50	1	50
Satellite pads	14	168	9	108	6	72	3	36
Roads	172 miles	1,290	134 miles	1,005	98 miles	735	98 miles	735
Vertical support members (pipeline miles)	212 miles	8	175 miles	7	120 miles	5	110 miles	5
Seawater treatment plant	1	15	1	15	1	15	1	15
Barge landing and storage	1	10	1	10	1	10	1	10
Gravel pits and stockpiles ²	—	309	—	220	—	154	—	144
Total (approximate)	—	2,000	—	1,464	—	1,040	—	995

Sources: BLM 2004, 2012; US Army Corps of Engineers (USACE) 2017

¹All potential facility numbers and surface disturbance acreages are general hypothetical estimates and are not based on specific project proposals. Acreages are approximate and are rounded to the nearest acre.

²The number of gravel pits is dependent on the locations of gravel resources in relation to project components and thus is unknown at this time.

— = not applicable

IMPACT ANALYSIS

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on-the-ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain.

The proposed leasing alternatives are a result of surface resource and management considerations and describe areas to offer for lease and the terms and conditions that would apply to exploration and development activities; they do not specifically propose development of oil and gas resources. For this reason, the analysis relies on a hypothetical development scenario consistent with those alternatives and PL 115-97 in a good faith effort to identify indirect effects of leasing that are not known at this time but nonetheless could be considered “reasonably foreseeable” (40 CFR Section 1508.8(b)) (see **Appendix C**).

The BLM and USFWS have relied on the best available science to inform its consideration of the environmental impacts surrounding an oil and gas leasing program in the Coastal Plain; however, the nature, abundance, and quality of the data often vary, depending on the action, the geographic region in which it occurs, and the environmental resources that may be affected. All these variables influence the understanding of how certain oil and gas exploration and development activities may affect environmental features.

If leases were explored and developed, the following general impacts would be expected from future oil and gas exploration, development, and production activities under all action alternatives:

- Potential impacts on subsistence users, both from impacts on subsistence species and from direct disturbance of hunts, displacement of resources from traditional harvest areas, and hunter avoidance of industrialized areas
- Potential impacts on water quality caused by water extraction and construction of ice roads and pads, gravel mining, and wastewater discharges from a central processing facility (CPF)
- Potential impacts from exploration, development, and production on air quality and air quality-related values due to air pollutant emissions
- Greenhouse gas (GHG) emissions from exploration, development, and production, produced oil and natural gas downstream combustion, and permafrost surface disturbance
- Potential impacts on topography, geology, soils, and permafrost from gravel mining and placing fill for infrastructure development
- Potential impacts on birds from predators and increased human presence
- Potential impacts on marine mammals, including human-polar bear interactions; vehicle, aircraft and boat traffic and noise disturbance; and accidental, unplanned take by vessel strikes or oil spills
- Potential impacts on terrestrial mammals, including disturbance from vehicle and aircraft noise, human presence, and habitat fragmentation and loss
- Disturbance and loss of permafrost, vegetation, and wetlands

- Potential impacts on state employment, labor income, and revenues
- Potential impacts on North Slope Borough (NSB) employment, income, and revenue
- Potential impacts on cultural resources by lease development
- Visual impacts from infrastructure and artificial light
- Loss or reduced quality of some access to recreation and use opportunities around areas leased for energy infrastructure

Residents of Kaktovik are the primary users of the program area and would therefore be most likely to experience potential impacts from future development. The community of Nuiqsut could experience impacts on caribou, waterfowl, and fish harvests from development. Residents of Arctic Village, Venetie, and other communities beyond the program area that rely on the Porcupine Caribou Herd and Central Arctic Caribou Herd could experience potential impacts from future development on caribou and, to a lesser extent, waterfowl. Incremental development of oil and gas-related infrastructure throughout the program area may erode cultural connections to, and subsistence uses of these lands for the Iñupiat, Inuvialuit, and Gwich'in.

CONSULTATION AND COORDINATION

The BLM and USFWS are the joint lead agencies for this SEIS. Section 20001(a)(1) of PL 115-97 explicitly directs that the Coastal Plain oil and gas program be managed by the Secretary of the Interior, acting through the BLM. However, the BLM Authorized Officer will coordinate with the USFWS, in their role as the Refuge land manager, as detailed in Section 1.4, Decisions to be Made, and Chapter 2, Table 2-3 (footnote 1).

Participating in the Leasing SEIS as cooperating agencies are the Environmental Protection Agency; State of Alaska; Native Village of Kaktovik; Iñupiat Community of the Arctic Slope; Native Village of Venetie Tribal Government; Venetie Village Council; and the Arctic Village Council.

The BLM and USFWS also consulted with federally recognized tribal governments during preparation of this Leasing SEIS; including Arctic Village Council, Iñupiat Community of the Arctic Slope, Native Village of Kaktovik, Native Village of Venetie (Venetie Village Council), Native Village of Venetie Tribal Government, Beaver Village Council, Birch Creek Tribal Council, Chalkyitsik Village Council, Gwitchyaa Zhee Gwich'in Tribal Government (Fort Yukon), Naqsragmiut Tribal Council (Anaktuvuk Pass), Native Village of Barrow Iñupiat Traditional Government, Native Village of Nuiqsut, Native Village of Stevens, Circle Village Council, and the Native Village of Eagle.

The joint lead agencies offered these entities the opportunity to participate in formal government-to-government consultation, to participate as cooperating agencies, or to simply receive information about the project. The dates and locations of government-to-government meetings that have taken place are provided in **Chapter 4**. The BLM also consulted with the Kaktovik Iñupiat Corporation and the Arctic Slope Regional Corporation under the DOI's Policy for Consultation with ANCSA corporations.

The BLM is consulting with the Alaska State Historic Preservation Office (SHPO) in accordance with Section 106 of the National Historic Preservation Act. This is because the BLM has a responsibility to consider the effects of the proposed leasing program on historic properties, which are properties listed on or eligible for listing on the National Register of Historic Places (NRHP). This consultation is to determine how proposed activities could affect cultural resources listed on or eligible for listing on the NRHP. Formal

consultations with the SHPO may also be required during implementation of individual projects. SHPO consultations for the leasing program are ongoing and will be completed by the time the Leasing SEIS ROD is signed.

Consultation was previously completed for this project with both the USFWS and the National Marine Fisheries Service (NMFS) under Section 7 of the ESA. Consultation with the USFWS and NMFS was reinitiated as part of developing this SEIS to address changes to the range of alternatives and mitigation measures (see **Chapter 4**). Biological opinions will be issued by USFWS and NMFS prior to the issuance of the ROD.

Section 810 of ANILCA focuses on issues related to the effects of proposed activities on subsistence use. An ANILCA Section 810 notice and public hearing is required if a proposed action may significantly restrict subsistence uses and needs. A preliminary evaluation and finding of effects on subsistence uses and needs from actions that could be undertaken under the five alternatives considered in this Leasing SEIS is provided in **Appendix F**. In the preliminary evaluation, the BLM found that the cumulative case presented in this SEIS may significantly restrict subsistence uses for the community of Kaktovik. As a result, a public hearing was held in the potentially affected community of Kaktovik on March 21, 2024. In addition, at the request of the Gwich'in Tribes, public hearings were held in Arctic Village, Venetie, Utquiagvik, and Fort Yukon despite not having a positive “may significantly restrict” findings.

The BLM has found in the final evaluation that the cumulative case considered in this Leasing SEIS may significantly restrict subsistence uses for the community of Kaktovik. A positive finding was not made for the Gwich'in communities because the evaluation did not find population-level effects to the Porcupine Caribou Herd would occur as a result of the leasing program.

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K	Vegetation and Wetlands, Birds, Terrestrial Mammals, and Marine Mammals
L	Fish and Aquatic Species
M	Cultural Resources
N	Subsistence Uses and Resources
O	Environmental Justice
P	Economy
Q	Essential Fish Habitat
R	Air Resources Technical Support Document
S	Bureau of Land Management Energy Substitution Model
T	Analysis of Incomplete and Unavailable Information
U	Response to Comments

ACRONYMS AND ABBREVIATIONS

Full Phrase

$\mu\text{g}/\text{m}^3$	micrograms per cubic meter
μPa	micro Pascal
AAAQS	Alaska Ambient Air Quality Standards
AAC	Alaska Administrative Code
ACCS	Alaska Center for Conservation Science
ACP	Arctic Coastal Plain
ACRC	Alaska Climate Research Center
ADCCED	Alaska Department of Commerce, Community, and Economic Development
ADEC	Alaska Department of Environmental Conservation
ADFG	Alaska Department of Fish and Game
ADNR	Alaska Department of Natural Resources
ADOLWD	Alaska Department of Labor and Workforce Development
ADOR	Alaska Department of Revenue
AFFF	aqueous film-forming foam
AHRS	Alaska Heritage Resources Survey
AMP	Adaptive Management Plan
ANCSA	Alaska Native Claims Settlement Act
ANILCA	Alaska National Interest Lands Conservation Act of 1980
AOGCC	Alaska Oil and Gas Conservation Commission
APD	Application for Permit to Drill
APDES	Alaska Pollutant Discharge Elimination System
AQRV	air quality related value
ARCP	Arctic Refuge Coastal Plain
ARPA	Archaeological Resources Protection Act of 1979
[Arctic] Refuge	Arctic National Wildlife Refuge
asl	above sea level
ASRC	Arctic Slope Regional Corporation
ASTAR	Arctic Strategic Transportation and Resources
AWOS	automated weather observing system
bb1	blue barrel
BBO	billion barrels of oil
BLM	Bureau of Land Management
BMP	best management practice
BOEM	Bureau of Ocean Energy Management
BOPD	barrels of oil per day
BS	Beaufort Sea stock
BSEE	Bureau of Safety and Environmental Enforcement
CAA	conflict avoidance agreement
CAH	Central Arctic Herd
CASTNET	Clean Air Status and Trends Network
CCP	Comprehensive Conservation Plan

ACRONYMS AND ABBREVIATIONS *(continued)*

Full Phrase

CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CH ₄	methane
CI	confidence interval
CO	carbon monoxide
CO ₂	carbon dioxide
CO ₂ e	carbon dioxide equivalent
CPF	central processing facility
CSU	controlled surface use
dB	decibels
dBA	A-weighted decibel
DEW	Distant Early Warning
DOD	Department of Defense
DOI	Department of the Interior
DPS	distinct population segment
dv	deciview
ECS	Eastern Chukchi Sea stock
EFH	Essential Fish Habitat
EIA	Energy Information Administration
EIS	environmental impact statement
EO	executive order
EPA	US Environmental Protection Agency
ESA	Endangered Species Act of 1973
°F	Fahrenheit
FAA	Federal Aviation Administration
FLIR	forward-looking infrared radiometry
FLPMA	Federal Land Policy and Management Act
FY	fiscal year
GFUR	general fund unrestricted revenue
GHG	greenhouse gas
GIS	Geographic Information System
GMT1	Greater Mooses Tooth 1
GMT2	Greater Mooses Tooth 2
GMU	Game Management Unit
GWP	global warming potential
HCP	hydrocarbon potential
IAP	Integrated Activity Plan
IBLA	Interior Board of Land Appeals

ACRONYMS AND ABBREVIATIONS *(continued)*

Full Phrase

ICAS	Iñupiat Community of the Arctic Slope
IHLC	Iñupiat History, Language, and Cultural Division
IMPROVE	Interagency Monitoring for the Protection of Visual Environments
IT	Information Technology
ITR	Incidental Take Regulation
kg/ha-yr	kilograms per hectare per year
kHz	kilohertz
KIC	Kaktovik Iñupiat Corporation
Leasing EIS	Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement
LLC	Limited Liability Corporation
LNG	Liquefied Natural Gas
LOA	Letter of Authorization
LRRS	long-range radar sites
M	magnitude
MIG	Marine Protected Areas
MMPA	Marine Mammal Protection Act
MMT	million metric tons
MPA	Marine Protected Area
mya	millions of years ago
NAAQS	National Ambient Air Quality Standards
NDVI	Normalized Difference Vegetation Index
NEPA	National Environmental Policy Act of 1969
NHPA	National Historic Preservation Act of 1966
NMFS	National Marine Fisheries Service
N ₂ O	nitrous oxide
NO ₂	nitrogen dioxide
NOAA	National Oceanographic and Atmospheric Administration
NPDES	National Pollutant Discharge Elimination System
NPR-A	National Petroleum Reserve-Alaska
NRHP	National Register of Historic Places
NSB	North Slope Borough
NSO	no surface occupancy
NWI	National Wetland Inventory
NWS	National Weather Service
NWT	Northwest Territory
O ₃	ozone
ORV	outstandingly remarkable value
Pb	lead

ACRONYMS AND ABBREVIATIONS *(continued)*

Full Phrase

PCH	Porcupine Caribou Herd
PDO	Pacific decadal oscillation
PFYC	Potential Fossil Yield Classification
PL	Public Law
PM ₁₀	particulate matter less than 10 microns in diameter
PM _{2.5}	particulate matter less than 2.5 microns in diameter
POC	Plan of Cooperation
Ppb	parts per billion
ppm	parts per million
PRPA	Paleontological Resources Preservation Act of 2009
PSO	protected species observer
ROD	record of decision
ROP	required operating procedure
ROW	right-of-way
RRS	Long-Range Radar Sites
RS	Revised Statute
SAR	stock assessment report
SBS	Southern Beaufort Sea
SEIS	Supplemental Environmental Impact Statement
SHPO	State Historic Preservation Office
SO	Secretarial Order
SO ₂	sulfur dioxide
STP	seawater treatment plant
3D	three-dimensional
TAPS	Trans-Alaska Pipeline System
TCF	trillion cubic feet
TCP	Traditional Cultural Property
TL	timing limitation
TLUI	Traditional Land Use Inventory
TNMPA	Tarium Niryutait Marine Protected Area
UCCI	Upstream Capital Costs Index
UIC	Underground injection control
US	United States
USACE	US Army Corps of Engineers
USC	United States Code
USCB	US Census Bureau
USFWS	US Fish and Wildlife Service
USGS	US Geological Survey
VOC	volatile organic compound

ACRONYMS AND ABBREVIATIONS *(continued)*

Full Phrase

VRI	Visual Resource Inventory
VSM	vertical support member
WSR	wild and scenic river
YKCA	Yukon-Koyukuk Census Area
ZOI	Zone of Influence

Chapter 1. Introduction

1.1 CHANGES SINCE PUBLICATION OF THE 2019 FINAL ENVIRONMENTAL IMPACT STATEMENT

This final supplemental environmental impact statement (hereafter Leasing SEIS) was developed by the Bureau of Land Management (BLM) and United States Fish and Wildlife Service (USFWS) as joint lead agencies to address deficiencies in the previous National Environmental Policy Act (NEPA) analysis in the 2019 Coastal Plain Oil and Gas Leasing Program Environmental Impact Statement (EIS; BLM 2019a) and the 2020 Record of Decision (ROD; BLM 2020a). The BLM issued the Final Coastal Plain EIS in 2019 and signed a Record of Decision for the leasing program on August 17, 2020 (85 *Federal Register* 51754).

The 2020 ROD approved a program to implement Section 20001 of Public Law (PL) 115-97—or the Tax Act—(December 22, 2017), which directs the BLM to manage the oil and gas leasing program in the Coastal Plain in a manner similar to lease sales under the Naval Petroleum Reserves Production Act of 1976, as amended. The Tax Act also requires the BLM to hold two lease sales of at least 400,000 acres each by December 2024. Following issuance of the 2020 ROD, the BLM conducted its first lease sale in the Coastal Plain on January 6, 2021. A total of nine tracts were leased. Secretarial Order (SO) 3401 (June 1, 2021) placed a temporary pause on leasing program activities in the Coastal Plain, pending a new and comprehensive analysis of the potential environmental impacts of the leasing program to address identified legal deficiencies. Also on June 1, 2021, the Principal Deputy Assistant Secretary for Land and Mineral Management issued lease suspension letters to the lessees of the nine tracts leased as a result of the January 6, 2021, lease sale. The Secretary of the Interior’s review of the 2019 EIS detailed in Secretarial Order 3401 identified multiple legal deficiencies in the underlying record supporting the leases, including, but not limited to: (1) insufficient analysis under NEPA, including failure to adequately analyze a reasonable range of alternatives in the EIS; and (2) failure in the August 17, 2020, ROD to properly interpret Section 20001 of the Tax Act.

The lease suspension letters explained the two legal deficiencies noted above and also identified the potential for additional legal defects. Two leases were subsequently canceled at the lessees’ request. The remaining seven leases, held by a third lessee, totaled 365,755 acres. On August 19, 2022, the Principal Deputy Assistant Secretary issued an addendum to the lease suspension for the remaining lessee, identifying an additional legal error, namely the failure of the 2019 EIS to either give a quantitative estimate of the downstream greenhouse gas emissions that would result from changes in consumption of oil abroad due to the foreseeable production of Coastal Plain oil, or sufficiently explain why the BLM could not give a quantitative estimate and provide a more thorough discussion of how changes in foreign oil consumption might change the greenhouse gas emissions analysis.

In light of the legal deficiencies underlying the 2019 EIS and subsequent 2020 ROD, the BLM was directed to review the oil and gas program and, as appropriate and consistent with applicable law, conduct a new comprehensive analysis of the potential impacts of the program. The BLM elected to prepare a SEIS. To ensure the BLM’s administration of the oil and gas program continues to benefit from the USFWS expertise concerning the purposes of the Arctic National Wildlife Refuge (Arctic Refuge; see **Section 1.5.1**) and environmental resources present, the BLM and USFWS became joint lead agencies for the SEIS in October 2021.

On September 6, 2023, the Deputy Secretary of the Interior issued a decision cancelling the remaining seven oil and gas leases due to pre-leasing legal defects. There are currently no leased tracts within the program area.

1.2 OVERVIEW

The joint lead agencies have prepared this SEIS in accordance with NEPA, as amended, to implement an oil and gas leasing program in the Arctic Refuge Coastal Plain. Congress identified the Coastal Plain in Section 1002 of the Alaska National Interest Lands Conservation Act (ANILCA) for its oil and natural gas potential; Section 1003 states that production is prohibited unless authorized by an act of Congress. Congress passed legislation in December 2017 (PL 115-97), lifting a prohibition on oil and gas development imposed by Section 1003 of ANILCA and requiring the BLM to implement an oil and gas leasing program (see **Section 1.5.1** for description of all ANILCA purposes of the Arctic Refuge). The Coastal Plain program area is composed of approximately 1,563,500 acres in the approximately 19.3-million-acre Arctic Refuge (**Map 1-1**, Program Area, in **Appendix A**). The oil and gas leasing program must consider and balance the Arctic Refuge purposes set out in Section 303(2)(B) of ANILCA, as amended by Section 20001 of PL 115-97.

This Leasing SEIS will serve to inform the BLM's implementation of PL 115-97, Section 20001(c)(1), i.e., the requirement to hold a second lease sale by December 22, 2024. It may also inform management of on-the-ground oil and gas activities, including seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain. Specifically, the Leasing SEIS considers and analyzes the environmental impacts of various leasing alternatives, including the areas to offer for sale, and the indirect impacts that could result in consideration of the hypothetical development scenario. All action alternatives were designed to meet Section 20001 of PL 115-97 and to account for all purposes of the Arctic Refuge. The alternatives analyze various terms and conditions (that is, lease stipulations and required operating procedures [ROPs]) that may be applied to leases and oil and gas activities, to properly balance oil and gas development with protection of surface resources.

This Leasing SEIS evaluates which lands to offer to lease and what terms and conditions to apply to those leases and oil and gas activities; it does not in itself authorize on-the-ground exploration or development. Future on-the-ground actions requiring BLM approval, including potential exploration and development proposals, would require further NEPA analysis based on the project-specific proposal. For example, before drilling on any lease, an operator would be required to apply for a permit to drill, which would require an appropriate NEPA analysis (as well as compliance with other applicable laws) before any drilling could be authorized. Potential applicants would be subject to the terms of the lease; however, the BLM Authorized Officer may require additional project-specific terms and conditions before authorizing any oil and gas activity based on the project-level NEPA analysis.

Issuance of an oil and gas lease does not have any direct effects on the environment, since it does not authorize drilling or any other ground-disturbing activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas, subject to reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The BLM cannot ascertain the precise extent of the effects of granting those rights until it receives and reviews potential future project-specific proposals for exploration and development. However, to meet the intent of NEPA, and as described in the Council on Environmental Quality's (CEQ) Forty Most Asked Questions Concerning CEQ's National Environmental Policy Act Regulations, the BLM has developed a scalable hypothetical development scenario consistent with those

leases, in a good faith effort to identify indirect effects that are not known at this time but nonetheless could be considered “reasonably foreseeable” (40 Code of Federal Regulations [CFR] 1508.8(b)) (see **Appendix C**).

The BLM developed the revised hypothetical development scenario in recognition of not only the rights granted by an oil and gas lease but also PL 115-97’s direction to the Secretary to “manage the oil and gas program in the Coastal Plain in a manner similar to the administration of lease sales under the Naval Petroleum Reserves Production Act of 1976 (including regulations).”

The hypothetical development scenario has been revised to address the legal deficiency related to the 2,000-acre interpretation, whereby all alternatives in the 2019 EIS were analyzed as having 2,000 acres of surface disturbance. The original assumptions have been revised to be applied proportionally across the new range of Leasing SEIS alternatives to estimate the number of acres that could be developed under each alternative.

However, there is tremendous uncertainty regarding potential exploration and development in the Coastal Plain. Any development scenario at this point is highly speculative given that it is unknown whether or where future leases will be issued, whether or where exploratory drilling may occur under leases, and whether or where economically developable oil and gas discoveries may be made. This uncertainty is due in part to the remoteness and lack of previous exploration and development of the Coastal Plain; its harsh environment and challenging engineering considerations; and the extended time it has taken to go from leasing to development in other regions of the North Slope of Alaska, including in the National Petroleum Reserve-Alaska (NPR-A).

1.3 PURPOSE AND NEED

Purpose: The joint lead agencies have undertaken this Leasing SEIS to inform the BLM’s administration of the oil and gas leasing program in the Coastal Plain consistent with PL 115-97. Need: Section 20001 of PL 115-97 requires the Secretary of the Interior, acting through the BLM, to establish and administer a competitive oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain area within the Arctic Refuge. Further, Section 20001(c)(1) of PL 115-97 requires that at least two lease sales be held by December 22, 2024, and that each sale offer for lease at least 400,000 acres of the highest hydrocarbon potential (HCP) lands within the Coastal Plain, allowing for up to 2,000 surface acres of federal land to be covered by production and support facilities.

Any oil and gas program alternative must consider all five statutory purposes of the Arctic Refuge, none of which are superseded by any other (see **Table 1-2**).

1.4 DECISIONS TO BE MADE

The BLM’s decisions will include which lands will be available for lease and the terms and conditions to be applied to leases and authorizations for oil and gas activities. The decisions evaluated in this Leasing SEIS and its ROD would not authorize any on-the-ground activity associated with the exploration or development of oil and gas resources in the Coastal Plain. The Tax Act requires at least 400,000 acres be offered at each of the required sales of “areas that have the highest potential for the discovery of hydrocarbons” (PL 115-97, Section 20001(c)(1)).

The USFWS continues to manage all federal lands in the Arctic Refuge Coastal Plain, including both potential leased and unleased areas; however, the BLM manages all aspects of the oil and gas program, including the issuance and administration of oil and gas leases, and permitting of all oil and gas activities.

Although Section 20001(a)(2) and (b)(2)(A) of PL 115-97 assigns sole responsibility to the BLM for administering the oil and gas program, it is understood that all activities, including plan development, study development, and consideration of exceptions, modifications, waivers, or any operations that will be conducted on the surface of the Arctic National Wildlife Refuge would include close coordination with the USFWS to ensure that its considerations as the surface management agency are taken into account as noted in **Table 2-3** (footnote 1). In addition, the BLM would coordinate with other appropriate federal, state, and North Slope Borough (NSB) agencies, Tribal Governments, Alaska Native Claims Settlement Act (ANCSA) corporations, and other Native organizations as appropriate.

1.5 PROGRAM AREA

The USFWS is the predominant land manager in the program area. Other lands in the Coastal Plain include Alaska Native lands conveyed pursuant to the ANCSA and Native allotments (see **Table 1-1**).

Table 1-1
Land Administration Included in PL 115-97 Coastal Plain

Subject to the BLM's Oil and Gas Leasing Authority	Acres	Outside the BLM's Oil and Gas Leasing Authority	Acres
USFWS-managed lands, including submerged lands	1,562,600	Native conveyed	24,400
Native allotment	900	Native selected	4,400
Total	1,563,500	Total	28,800

Source: BLM and USFWS GIS 2022

Note: Acreages are rounded to nearest 100.

The Coastal Plain program area is referred to as the 1002 Area. The program area includes all federal lands and waters comprising the approximately 1,563,500 acres of the Coastal Plain within the 19.3-million-acre Arctic Refuge (**Map 1-1** in **Appendix A**, and **Section 1.5.1**, below). The program area excludes a northern coastal portion of Air Force-administered lands near Kaktovik. As subsurface mineral interest owner, the BLM may lease subsurface of allotments; however, allotment holders retain ownership of the surface. Lands outside the BLM's oil and gas leasing program authority are those lands excluded from the definition of the Coastal Plain in PL 115-97, Native conveyed lands, and Native-selected lands.

As acknowledged by PL 115-97, in Map Plates 1 and 2, State selection rights under the Alaska Statehood Act to approximately 20,000 acres in the northwest portion of the Coastal Plain are the subject of a pending lawsuit filed by the State of Alaska in the U.S. District Court of Alaska (*State of Alaska v. Department of the Interior*; Docket No. 3:22-cv-00078-SLG). The US currently owns and manages this land.

1.5.1 Arctic National Wildlife Refuge

The Arctic National Wildlife Range was established in 1960 by Public Land Order (PLO) 2214 "For the purpose of preserving unique wildlife, wilderness and recreational values...." In 1980, ANILCA redesignated and expanded the range as part of the larger Arctic Refuge. It also designated much of the original range as wilderness under the 1964 Wilderness Act and provided four purposes to guide management of the entire refuge. The original purposes of the Arctic National Wildlife Range established in PLO 2214 were superseded by Section 303(2)(B) of ANILCA, as amended by PL 115-97. Section

20001(b)(2)(B) of PL 115-97 amended Section 303(2)(B) of ANILCA by adding a fifth purpose to provide for an oil and gas program in the Coastal Plain. **Table 1-2** identifies the section of this Leasing SEIS where impacts of oil and gas leasing associated with specific Arctic Refuge purposes can be found.

Table 1-2
Section of SEIS Describing Impacts Associated with Arctic Refuge Purposes

Purpose ¹	SEIS Section Describing Impacts on the Arctic Refuge's Purpose
(i) to conserve fish and wildlife populations and habitats in their natural diversity; including but not limited to, the Porcupine Caribou Herd (including participation in coordinated ecological studies and management of this herd and the Western Arctic Caribou Herd), polar bears, grizzly bears, muskox, Dall sheep, wolves, wolverines, snow geese, peregrine falcons and other migratory birds, Arctic char, and grayling	3.2.2 Air Quality 3.2.8 Soil Resources 3.2.10 Water Resources 3.3.1 Vegetation and Wetlands 3.3.2 Fish and Aquatic Species 3.3.3 Birds 3.3.4 Terrestrial Mammals 3.3.5 Marine Mammals
(ii) to fulfill the international fish and wildlife treaty obligations of the US with respect to fish and wildlife and their habitats	3.3.3 Birds 3.3.4 Terrestrial Mammals 3.3.5 Marine Mammals
(iii) to provide, in a manner consistent with the purposes set forth in subparagraphs (i) and (ii), the opportunity for continued subsistence uses by local residents	3.4.3 Subsistence Uses and Resources
(iv) to ensure water quality and necessary water quantity within the refuge	3.2.10 Water Resources
(v) to provide for an oil and gas program in the Coastal Plain	3.2.5 Geology and Minerals 3.2.6 Petroleum Resources 3.4.10 Economy

¹Purposes i-iv are from ANILCA PL 96-487 (16 USC 668 (2))

The USFWS would continue management of Arctic Refuge lands under the guidance of its current comprehensive conservation plan (CCP) (USFWS 2015a) and any amendments thereto. The BLM does not have authority to enter into cooperative agreements for co-management of surface resources in the Arctic Refuge; surface lands are not BLM-managed lands under the Federal Land Policy and Management Act (FLPMA) Section 307(b).

1.6 SCOPING AND ISSUES

The BLM conducted formal scoping for the Leasing SEIS following publication of a Notice of Intent in the *Federal Register* on August 4, 2021. In September 2021, the BLM held six virtual public scoping meetings. Oral comments were captured by a court reporter at all meetings. The BLM formally accepted scoping comments through October 4, 2021. The USFWS was not yet confirmed as a joint lead agency during the SEIS public scoping period. For more information on the scoping process, see the final scoping report on the BLM's project website: <https://eplanning.blm.gov/eplanning-ui/project/2015144/510>.

The following summaries highlight a few key issues identified during scoping and addressed in this Leasing SEIS. The full list of summaries is available in the final scoping report.

- **NEPA and alternatives**—Commenters requested changes to the existing alternatives, revisions of the lease stipulations or ROPs, and for the Leasing SEIS to consider new data and best available science, particularly related to terrestrial wildlife, birds, and special status species (such as polar bears).
- **Fish and wildlife**—Commenters stated concerns about the impacts on fish and wildlife, including caribou and other large terrestrial mammals, marine mammals, migratory birds, and fish and other aquatic species. Potential impacts on the Porcupine Caribou Herd were of particular concern. Commenters requested that the SEIS evaluate the use and importance of the program area to herd movement during different life stages and seasons and how the proposed program might affect calving grounds, insect-relief areas, and migration routes.
- **Special status species**—Commenters noted that the proposed program could reduce and fragment available terrestrial denning habitat for the Southern Beaufort Sea (SBS) subpopulation of polar bear, which is a species listed as threatened under the Endangered Species Act (ESA). Commenters requested that the BLM analyze impacts on all special status species, including marine mammals, such as ringed seals, bearded seals, and bowhead whales.
- **Air quality and climate**—Commenters asked for a more comprehensive analysis of the alternatives’ direct, indirect, and cumulative impacts on air quality and greenhouse gas emissions.
- **International agreements**—Commenters asked how the BLM would respect and adhere to agreements with Canada, particularly regarding migratory and transboundary species such as the Porcupine Caribou Herd. Commenters noted several agreements and memoranda of understanding of concern.
- **2,000-acres of surface development**— Commenters requested clarification of what types of facilities are included in the 2,000-acre surface development limit, as described in Section 20001(c)(3) of PL 115-97 and asked for the BLM to consider alternatives with different amounts of surface development.
- **Subsistence and sociocultural systems**—Commenters noted that certain local Tribes are culturally tied to the Coastal Plain and the Porcupine Caribou Herd, and requested that the BLM analyze impacts on the Tribes’ traditional way of life. They asked that the BLM consider the positive and negative economic changes to communities, impacts on the traditional subsistence-based economy, food scarcity, changes to access to traditional subsistence use areas, and impacts on subsistence food resources.

Issues outside the scope of the Leasing SEIS were also identified during scoping, as follows:

- Comments advocating keeping the Coastal Plain closed to oil and gas leasing
- Comments about land management actions outside of the BLM’s jurisdiction
- Comments on issues that do not meet the stated purpose and need of the SEIS

Resources and topics that were considered but dismissed from detailed analysis in the Leasing SEIS include the following:

- **Forestry**—The program area is above the latitudinal tree line, where forestry activities are infrequent.
- **Wildland fire**—The program area is above the latitudinal tree line in a predominantly wetland environment, where wildland fire is rare.

1.7 SEIS PROCESS

The US Environmental Protection Agency (EPA) published the Notice of Availability of the Draft SEIS in the *Federal Register* on September 8, 2023, initiating a 45-day public comment period. In response to public comments received, the comment period was extended an additional 15 days to November 7, 2023, for a total of 60 days. In September and October 2023, the joint lead agencies held public meetings to receive comments on the Draft SEIS. Public meetings were held in Utqiagvik, Venetie, Arctic Village, Fort Yukon, Anchorage, and Fairbanks. In conjunction with the Draft SEIS public meetings, the BLM held subsistence hearings in Utqiagvik, Venetie, Arctic Village, and Fort Yukon, pursuant to Section 810(a) of ANILCA. An ANILCA 810 hearing was also held in Kaktovik on March 21, 2024, after the close of the public comment period.

The joint lead agencies received comments by postal mail, email, online comment form through the ePlanning website, and verbal testimony at public meetings. A total of 112,963 comment letter submissions were received; 792 of which were considered unique submissions and 112,171 were part of form letter campaigns. Overall, more than 1,807 substantive comments were identified (see **Appendix U**). The BLM will not issue its decision on the leasing program, called the ROD, until at least 30 days after the EPA publishes the Notice of Availability of this Final SEIS in the *Federal Register*.

1.8 COLLABORATION AND COORDINATION

1.8.1 Lead and Cooperating Agencies

The BLM and USFWS are joint lead agencies for the Leasing SEIS. Section 20001(a)(1) of PL 115-97 explicitly directs that the Coastal Plain oil and gas program be managed by the Secretary of the Interior, acting through the BLM. However, the BLM Authorized Officer will closely coordinate with the USFWS, in their role as the Refuge land manager, as detailed in Section 1.4, Decisions to be Made, and Chapter 2, Table 2-3 (footnote 1).

Participating in the Leasing SEIS as cooperating agencies are the EPA; State of Alaska; Native Village of Kaktovik; Iñupiat Community of the Arctic Slope (ICAS); Native Village of Venetie Tribal Government; Venetie Village Council; and Arctic Village Council. Their participation in the planning process does not constitute their approval of the analysis, conclusions, or alternatives presented in this SEIS; for these, the joint lead agencies are solely responsible. Cooperating agencies assisted the joint lead agencies in developing alternatives, shaping the lease stipulations and ROPs, providing new data for inclusion, and reviewing and providing input on the Draft SEIS. The list of preparers for the Leasing SEIS is in **Chapter 4**.

1.8.2 Consultation with Tribes and ANCSA Corporations

The joint lead agencies consulted with federally recognized Tribal governments during preparation of this SEIS and identified 15 tribes potentially affected by the leasing program (see **Chapter 4**). Consistent with Department of the Interior (DOI) policy on government-to-government consultation with Tribes (see SO

3403), the BLM¹ first sent a letter of notification and inquiry on August 18, 2021, to the identified Tribal governments. In its letter, the BLM offered these entities the opportunity to participate in formal government-to-government and National Historic Preservation Act (NHPA) Section 106 consultations, to participate as NEPA cooperating agencies, or to simply receive information about the project.

The joint lead agencies have also offered ANCSA corporations the opportunity to participate in formal consultation. Consultation meetings have been held with Kaktovik Iñupiat Corporation (KIC) and ASRC (see **Chapter 4**).

1.8.3 Coordination and Consultation with Local, State, and Federal Agencies

The BLM is consulting with the Alaska State Historic Preservation Office (SHPO), in accordance with Section 106 of the NHPA. This is because the BLM has a responsibility to consider the effects of the proposed leasing program on historic properties, which are properties listed on or eligible for listing on the National Register of Historic Places (NRHP). This consultation is to determine how proposed activities could affect cultural resources listed on or eligible for listing on the NRHP. Formal consultations with the SHPO may also be required when individual projects are implemented. SHPO consultations for the leasing program are ongoing and will be completed by the time the Leasing SEIS ROD is signed.

Consultation was previously completed for this project with both the USFWS and the National Marine Fisheries Service (NMFS) under Section 7 of the ESA. Consultation with the USFWS and NMFS was reinitiated as part of developing this SEIS to address changes to the range of alternatives and mitigation measures (see **Chapter 4**). Biological opinions will be issued by USFWS and NMFS prior to the issuance of the ROD.

Coordination under the Magnuson-Stevens Fishery Conservation and Management Act regarding essential fish habitat (EFH) is occurring between federal-authorizing agencies and the NMFS, parallel to the NEPA process.

1.9 REQUIREMENTS FOR FURTHER ANALYSIS

The programmatic decision on oil and gas leasing based on the analysis in this Leasing SEIS will guide the second Coastal Plain lease sale, required to occur by December 22, 2024. The lease sale might offer only a portion of the lands identified in the ROD as available, making possible a phased approach to leasing and development. However, for the impact analysis, and consistent with the Tax Act, this Leasing SEIS assumes that no fewer than 400,000 acres of land that would be made available for lease following issuance of the Leasing SEIS ROD would be offered in the second lease sale as required by the Tax Act.

Future on-the-ground actions requiring BLM approval, including potential exploration and development proposals, would require further NEPA analyses based on the project-specific proposal. Potential applicants would be subject to the terms of applicable leases; however, the BLM Authorized Officer may require additional project-specific terms and conditions before authorizing any oil and gas activity based on the project-level NEPA analysis.

¹The USFWS was not yet confirmed as a joint lead agency at this point.

1.10 INTERNATIONAL AGREEMENTS, LAWS, REGULATIONS, AND PERMITS

In implementing the Coastal Plain Oil and Gas Leasing Program, the BLM would comply with applicable international agreements; federal, state, and local laws and regulations; and executive orders (EOs).

In 1973, the US signed the Agreement on the Conservation of Polar Bears (Range States Agreement). This is an agreement between the governments of Canada, Denmark, Norway, the former Union of Soviet Socialist Republics, and the US, recognizing the responsibilities of circumpolar countries for coordinating actions to protect polar bears. Additionally, signed in 1988 and reaffirmed in 2000 by the Inuvialuit Game Council and the North Slope Borough (NSB) Fish and Game Management Committee, the Inupiat-Inuvialuit Agreement on Polar Bear Management in the Southern Beaufort Sea, is a user-to-user agreement on the conservation of polar bears specific to the Southern Beaufort subpopulation.

In 1987, the U.S. and Canadian governments signed the Agreement Between the Government of Canada and the Government of The United States of America on the Conservation of the Porcupine Caribou Herd. The main objectives of the agreement include conservation of the Porcupine Caribou Herd and its habitat through international cooperation and coordination. The goals include minimizing the risk of irreversible damage or long-term adverse effects, including cumulative effects, as a result of use of caribou or their habitat. Further, it ensures opportunities for customary and traditional uses of the Porcupine Caribou Herd. The agreement calls for the establishment of an advisory board, the International Porcupine Caribou Board, which is composed of appointed representatives from both countries, who give advice and recommendations to the countries on the conservation and management of the herd.

The U.S., Canada, Mexico, Russia, and Japan have also signed treaties protecting birds subject to the Migratory Bird Treaty Act. For a summary of applicable international agreements; federal, state, and local laws, regulations, permits; and EOs, refer to **Appendix E**. The joint lead agencies will continue to consult with regulatory agencies, as appropriate, during subsequent NEPA processes before oil and gas activities are authorized, to ensure all requirements are met.

1.10.1 2,000-Acre Facility Limit in the Tax Cuts and Jobs Act of 2017 (Public Law 115-97)

This section contains the BLM's interpretation of Section 20001(c)(3) of PL 115-97, which states the following:

SURFACE DEVELOPMENT—In administering this section, the Secretary shall authorize up to 2,000 surface acres of Federal land on the Coastal Plain to be covered by production and support facilities (including airstrips and any area covered by gravel berms or piers for support of pipelines) during the term of the leases under the oil and gas program under this section.

For purposes of estimating and describing impacts of oil and gas activities that may result under each action alternative analyzed in the Leasing SEIS, the joint lead agencies are utilizing the following definition of the 2,000-acre limit, which slightly revises the definition that was put forward in the 2019 EIS (BLM 2019a) and is substantially different than the interpretation of the Section 20001(c)(3) contained in the 2020 ROD (BLM 2020a).

The BLM interprets this provision as limiting to 2,000 the total number of surface acres of *all* federal land across the Coastal Plain, regardless of whether such land is leased, which may be covered by production and support facilities. Once 2,000 acres of disturbance are reached, no additional disturbance would be

allowed, regardless of reclamation of previously disturbed areas. Under this interpretation, production and support facilities not authorized by an oil and gas lease (for example, off-lease pipelines or roads authorized by a right-of-way [ROW] grant) would be counted toward the 2,000-acre limit, as would on-lease production and support facilities. In this regard, both on-lease and off-lease production and support facilities would be counted toward the disturbance limit. The limit does not apply to production and support facilities on nonfederal lands, including Native allotments and land owned by ANCSA corporations.

The BLM interprets this limitation to generally refer to the acres of land directly occupied by non-ephemeral facilities (that is, those that occupy the land for more than one winter season) that are primarily used for the purpose of development, production, and transportation of oil and gas in and from the Coastal Plain. In applying that standard, 1) “facility” is given its ordinary dictionary definition, which is something that is built, installed, or established to serve a particular purpose; here, the purpose is development, production, and transportation of oil and gas in and from the Coastal Plain; 2) the limitation does not apply to surface disturbance indirectly related to or resulting from those facilities; and 3) the limitation applies only to those portions of oil and gas facilities that touch the land. Thus, the BLM interprets the types of “production and support” facilities that will count toward the 2,000-acre limit as including any type of gravel or other fill-constructed facility that touches the land, including:

- Gravel pads used for production or processing facilities (including wells), pump or compressor stations, and lodging facilities for workers
- Gravel airstrips or roads
- Any other area covered by gravel berms or piers for support of pipelines

In addition, the BLM interprets “production and support facilities” to include gravel mines used to supply mineral materials for construction and maintenance of oil and gas facilities within the Coastal Plain (specifically, the portions of land that have undergone excavation of mineral materials or contain stockpiles of mined mineral materials).

Examples of the types of facilities that would not count toward the 2,000-acre limit include the portion of facilities that do not touch the land (such as elevated pipelines) and facilities constructed with snow or ice (for example, snow trails and ice roads/pads).

Chapter 2. Alternatives

2.1 INTRODUCTION

NEPA directs federal agencies to “study, develop, and describe appropriate alternatives to recommend courses of action in any proposal that involves unresolved conflicts concerning alternative uses of available resources” (42 USC 4332). The NEPA implementing regulations were updated in 2022 to be consistent with Executive Order 13990 objectives, per President Biden’s direction; the CEQ promulgated a final rule on April 20, 2022. As part of the new regulations, the CEQ reverted to the original 1978 CEQ definition of a reasonable range of alternatives, which defined a reasonable range of alternatives to include “those that are practicable or feasible from the technical and economic standpoint and using common sense, rather than simply desirable from the standpoint of the applicant” (CEQ 1981).

This chapter describes the alternatives under consideration in this Leasing SEIS, including the No Action Alternative (Alternative A) and four action alternatives (Alternatives B, C, D, and D2). The action alternatives described in **Section 2.2**, Description of the Alternatives, include a mix of lease stipulations and ROPs that contain measures to avoid or mitigate surface damage and minimize ecological disturbance throughout the program area while balancing the five statutory purposes. The alternatives respond to the purpose of and need for action, including the legislative requirement to establish and administer a competitive oil and gas program in the Coastal Plain in the Arctic Refuge.

Any decision that the BLM makes following the analysis in this Leasing SEIS must be consistent with PL 115-97 and take into consideration all of the Arctic Refuge’s purposes set out in Section 303(2)(B) of ANILCA, as amended by Section 20001(b)(2)(B) of PL 115-97. Decisions must also conform to other applicable laws and regulations (see **Section 1.4**).

2.2 ALTERNATIVES DEVELOPMENT

The joint lead agencies determined that there were three key components to the alternatives that would need to be revisited for the Leasing SEIS: the lease stipulations and ROPs, the interpretation and application of the 2,000-acre disturbance limit from PL 115-97, and the areas open to seismic exploration activities.

The BLM held a 60-day public scoping period to solicit public input on the Leasing SEIS (see **Section 1.6**). Commenters suggested a variety of alternative concepts and revisions to the lease stipulations and ROPs that had been included in the 2019 EIS (BLM 2019).

To begin development of alternatives for analysis in this Leasing SEIS, the BLM and USFWS reviewed public comments that were submitted on the 2019 EIS, as well as those submitted during scoping for the Leasing SEIS, for any alternative concepts that may have been previously excluded from consideration but might now be relevant following SO 3401. The joint lead agencies used these screening criteria to help evaluate potential alternatives:

- Does the suggested alternative component meet the purpose of and need for the program?
- Is the alternative component economically, technologically, and logistically feasible?
- Does the alternative component address substantive issues identified through SO 3401 and public scoping?

The joint lead agencies held an alternatives development workshop with cooperating agencies to reexamine key concerns around the first component of the Leasing SEIS alternatives, the lease stipulations and ROPs. Through this collaborative exercise, it was determined that a new suite of lease stipulations and ROPs would be developed to help incorporate new data and information and to help address the deficiencies identified in the 2019 EIS. After the initial alternatives workshop, the joint lead agencies convened smaller resource-focused groups that consisted of specialists from the BLM, USFWS, and representatives from cooperating agencies to further refine lease stipulations and ROPs into the new Alternative D (see **Section 2.3.4**). These groups met over a two-week period to provide input on the lease stipulations and ROPs, resulting in a total of 14 resource-focused meetings. At the end of the resource-focused meetings, the joint lead agency subject matter experts were asked to review the suggestions and come to consensus on a revised suite of lease stipulations and ROPs for Alternative D in the Draft SEIS.

To address the remaining components of the new range of action alternatives for the Leasing SEIS, the BLM has revised the reasonably foreseeable development (RFD) scenario (40 CFR 1508.1(g)) to determine the effects of issuing leases. The acres of estimated surface disturbance for Alternatives C and D were revised to allow for analysis of less than 2,000 acres of disturbance (see **Appendix C**). Additionally, the joint lead agencies determined that seismic exploration activities would be limited to only those areas available for lease sale under each action alternative, effectively reducing the areas where seismic exploration could occur under Alternatives C, D, and D2 (see **Table 2-1**).

2.3 DESCRIPTION OF THE ALTERNATIVES

Table 2-1 highlights the key differences among action alternatives relative to areas available for leasing and lease stipulations. It is anticipated that directional horizontal extended reach drilling would be used across all action alternatives to increase recovery of the oil and gas resources. **Table 2-2** provides the acreages attributed to each stipulation proposed in the alternatives. **Table 2-3** is a complete description of all lease stipulations and ROPs proposed for each action alternative.

Table 2-1
Quantitative Summary of Lease Stipulations by Action Alternative

Lease Availability/Stipulations (acres)*	Alternative B	Alternative C	Alternative D	Alternative D2
Not available for lease sale	0	526,300	797,700	1,163,500
Available for lease sale, subject to no surface occupancy (NSO)	358,100	708,200	726,300	231,700
Available for lease sale, subject to controlled surface use (CSU)	0	123,900	15,900	84,300
Available for lease sale, subject to timing limitations (TLs)	585,400	0	1,800	3,100
Subject to only standard terms and conditions	620,000	205,100	21,800	80,900
Total available for lease sale**	1,563,500	1,037,200	765,800	400,000

Source: BLM and USFWS GIS 2022

* Acres are rounded to the nearest 100.

** Seismic exploration would only be allowed on the areas available for leasing under each alternative

Table 2-2
Quantitative Comparison of Individual Lease Stipulations by Alternative

Lease Availability/Stipulations (acres)	Alternative B	Alternative C	Alternative D	Alternative D2
1—Rivers and streams (NSO)	290,400	347,800	617,900	231,600
2—Canning River delta and lakes (NSO)	0	68,000	67,300	56,000
3—Springs/aufeis (not offered for lease sale)	0	93,100	170,800	145,400
3—Springs/aufeis (NSO)	0	117,800	117,800	117,800
4—Nearshore marine, lagoon, and barrier islands (NSO)	70,800	70,800	59,200	33,400
4—Nearshore marine, lagoon, and barrier islands (TL)	70,800	70,800	59,200	33,400
5—Coastal polar bear denning river habitat (NSO)	0	105,400	104,100	61,600
5—Coastal polar bear denning river habitat (TL)	0	0	0	93,300
6—PCH comprehensive calving habitat (not available for lease sale)	0	0	628,900	0
6—PCH comprehensive post-calving habitat area (controlled surface use)	0	0	332,000	0
6—PCH comprehensive calving habitat (TL)	0	0	105,100	43,100
6—PCH comprehensive post-calving habitat area (TL)	0	0	332,000	116,500
7—PCH calving area (not offered for lease sale)	0	476,600	0	628,900
7—PCH calving area (NSO)	0	244,600	0	0
7—PCH calving area (TL)	721,200	0	0	0
8—PCH post-calving area (controlled surface use)	0	264,300	0	0
9—Coastal area (NSO)	0	197,000	152,700	93,300
10—Wilderness boundary (not offered for sale)	0	0	210,200	210,200
10—Wilderness boundary (NSO)	0	96,600	42,000	17,200
11—Native allotments requirements	900	900	900	900
12—Ice-rich soils and yedoma deposits (NSO)	0	0	266,000	0

Source: BLM and USFWS GIS 2022

PCH = Porcupine Caribou Herd

2.3.1 Alternative A—No Action Alternative

Under Alternative A, the No Action Alternative, no federal minerals in the Coastal Plain would be offered for future oil and gas lease sales after the ROD for this Leasing SEIS has been signed. Alternative A would not comply with the directive under PL 115-97 to establish and administer a competitive oil and gas program for leasing, developing, producing, and transporting oil and gas in and from the Coastal Plain in the Arctic Refuge and to hold at least two lease sales (total) by December 22, 2024. It also would not meet the purpose of the Arctic Refuge to provide for an oil and gas program in the Coastal Plain, set out in Section 303(2)(B)(v) of ANILCA. Under this alternative, current management actions would be maintained, and resource trends are expected to continue, as described in the Arctic Refuge Revised CCP (USFWS 2015a).

Alternative A would not meet the purpose and need of the action, which is the BLM's implementation of PL 115-97, including the requirement to hold two lease sales and to permit associated oil and gas activities; however, Alternative A is being carried forward for analysis to provide a baseline for comparing impacts under the action alternatives, as required by the CEQ NEPA regulations.

2.3.2 Alternative B

Alternative B uses the same lease stipulations and ROPs as Alternative B from the 2019 EIS, with minor edits where appropriate (BLM 2019). This alternative would offer the opportunity to lease the entire program area with the fewest acres with NSO stipulations; however, it would provide additional protections in the form of other lease stipulations and ROPs that would apply to oil and gas activities to reduce potential impacts. An estimated 2,000 acres of surface disturbance would occur under Alternative B. Once 2,000 acres of disturbance are reached, then no additional disturbance would be allowed pursuant to Section 20001(c)(3) of the Tax Act (see **Appendix C**). Seismic exploration would be allowed to occur across the entire program area. Areas of the Coastal Plain that would be available for lease sale and applicable stipulations under Alternative B are shown in **Map 2-1**, Alternative B, and **Map 2-2**, Alternative B, Lease Stipulations (**Appendix A**).

2.3.3 Alternative C

Alternative C includes the same lease stipulations and ROPs as Alternative D1 in the 2019 EIS, with minor edits where appropriate (BLM 2019). Land within the program area that would be available for lease sale and applicable stipulations are shown in **Map 2-3**, Alternative C, and **Map 2-4**, Alternative C, Lease Stipulations. As compared to Alternative D1 in the 2019 EIS, the key changes under this alternative for the Leasing SEIS include the following: seismic exploration would only be allowed in areas available for lease sale, and the RFD estimated total area of surface disturbance would be 1,464 acres (a reduction of 536 acres) (see **Appendix C**). Under Alternative C, portions of the Coastal Plain would not be available for lease sale (**Table 2-1**). In addition, a large portion of the area available for lease sale would be subject to NSO stipulations. In some instances, more prescriptive ROPs are analyzed under Alternative C than under Alternative B.

2.3.4 Alternative D

Alternative D addresses the NEPA deficiency identified by the Secretary in SO 3401 regarding the failure of the 2019 EIS (BLM 2019) to adequately analyze a reasonable range of alternatives and is derived from Alternative D2 in the 2019 EIS. This alternative incorporates more protective lease stipulations and ROPs than any alternative previously analyzed, has the most acres with NSO stipulations, and stresses protection of the four conservation-orientated statutory purposes of the Arctic Refuge. Alternative D also includes considerations for climate change impacts through facility location and construction, and coordination with local communities to help ensure protections for public health, safety, and the environment. In considering where to apply NSO stipulations, the joint lead agencies took into account the use of horizontal extended reach drilling, which can extend up to 6 or more miles from the surface drilling location. Alternative D was developed collaboratively by joint lead agency specialists, with input from cooperating agencies, and Indigenous knowledge from Tribal governments. Alternative D meets the legal requirements to conduct a second lease sale as required by Section 20001(c)(1) of the Tax Act. The RFD estimates that the total area of surface disturbance under Alternative D would be 1,040 acres (see **Appendix C**). Additionally, seismic exploration would only be allowed in areas available for lease sale. Areas of the Coastal Plain that would be available for lease sale and applicable stipulations for Alternative D are shown in **Map 2-5**, Alternative D, and **Map 2-6**, Alternative D, Lease Stipulations.

2.3.5 Alternative D2 (Preferred Alternative)

In response to public comments on the Draft Leasing EIS, the BLM and USFWS developed Alternative D2, a variation on Alternative D, making available the Tax Act's statutory minimum acreage of 400,000 acres for a second lease sale in the northwest portion of the program area that has the highest potential for the discovery of hydrocarbons. This includes, in part, the area previously covered by the seven oil and gas leases cancelled by the Deputy Secretary of the Interior on September 6, 2023, and therefore now potentially available for lease in a future sale. Lands in the medium and low hydrocarbon potential areas are closed to leasing under this alternative (which are closed to leasing under the no action alternative).

Alternative D2, the joint lead agencies' Preferred Alternative, is derived from Alternative D (above) while focusing on the area that has the highest hydrocarbon potential. The alternative also addresses additional public requests to expand protections for key resources including polar bears and caribou, expanding on such protections in Alternative D. Alternative D2 includes areas of no leasing in the coastal areas around the Canning and Staines Rivers and around Camden Bay to provide additional protections for maternal polar bear denning and coastal movement (Lease Stipulation 5) and expands the no leasing area in the medium hydrocarbon area which corresponds to critical Porcupine Caribou Herd calving areas (both expanded no leasing areas are closed to leasing in the no action alternative).

To ensure a balance of the five purposes of the Refuge and to allow for a feasible oil and gas leasing program, Alternative D2 refines three specific stipulations from Alternative D to allow for more surface occupancy in the high hydrocarbon potential area. Stipulation 1 (Rivers) removes a 0.25-mile buffer around "all unnamed rivers" due to constraints on surface occupancy. It was recognized that ROP 3, which is designed to minimize the impact of contaminants from refueling operations on fish, wildlife, and the environment, in effect protects the unnamed rivers from contamination due to a 500-foot setback identified in the ROP. Lease Stipulation 3 (Springs and Aufeis) was edited to decrease the no leasing buffer from 3 miles to 1 mile, which prohibits leasing and infrastructure from adjacent to or above the perennial Tamayariak Spring and associated aufeis field. This decrease in the buffer afforded the extra no leasing acreage to be more strategically placed along the coast for maternal polar bear denning as discussed above. Lease Stipulation 12 (Ice Rich Soils and Yedoma Deposits) was revised to remove NSO restrictions but retains the key consideration for climate change impacts through facility design and construction to accommodate the thaw subsidence anticipated over the design life in areas of ice-rich soils and yedoma deposits. Areas of the Coastal Plain that would be available for lease sale and applicable stipulations for Alternative D2 are shown in **Map 2-7**, Alternative D, and **Map 2-8**, Alternative D2, Lease Stipulations.

The RFD estimates the total area of surface disturbance under Alternative D2 would be 995 acres, the lowest of the four action alternatives (see **Appendix C**). Seismic exploration would only be allowed in areas available for lease sale. Areas of the Coastal Plain that would be available for lease sale and applicable stipulations for Alternative D2 are shown in **Map 2-7**, Alternative D2, and **Map 2-8**, Alternative D2, Lease Stipulations.

2.3.6 Lease Stipulations and Required Operating Procedures

Protective measures in Alternatives B, C, D, and D2 are of two types: lease stipulations and ROPs (see **Table 2-3**, below).

Lease Stipulations

Appropriate stipulations are attached to the lease when the BLM issues it. As part of a lease contract, stipulations are specific to the lease. All oil and gas activity permits issued to a lessee must comply with the lease stipulations appropriate to the activity under review, such as exploratory drilling or production pad construction.

A stipulation included in an oil and gas lease could be subject to a waiver, exception, or modification, as appropriate. The objective of a stipulation must be met before a waiver, exception, or modification would be granted. Waivers, exceptions, and modifications are:

- A waiver—A permanent exemption to a stipulation on a lease
- An exception—A one-time exemption to a lease stipulation, determined on a case-by-case basis
- A modification—A change attached to a lease stipulation, either temporarily or for the life of the lease

The BLM Authorized Officer may authorize a modification to a lease stipulation only if the officer determines that the factors leading to the stipulation have changed sufficiently to make the stipulation no longer justified; the proposed operation would still have to meet the objective stated for the stipulation.

While the BLM may grant a waiver, exception, or modification of a stipulation through the permitting process, it may also impose additional requirements through permitting terms and conditions to meet the objectives of any stipulation. This would be the case if the BLM Authorized Officer considers that such requirements are warranted to protect the land and resources, in accordance with the BLM's responsibility under relevant laws and regulations. Note that PL 115-97 requires that the BLM shall issue any rights-of-way or easements across the Coastal Plain for the exploration, development, production, or transportation necessary to carry out the Tax Act. It should be noted that a ROW or easement could be granted even in areas closed to leasing or with a NSO stipulation. The Authorized Officer will issue a waiver, exception, or modification to a lease stipulation or ROP only following 30 days of public notice. Moreover, the Authorized Officer must document their decision and rationale for any waiver, exception, or modification in writing.

Required Operating Procedures

The ROPs under Alternatives B, C, D, and D2 describe the protective measures that the BLM would impose on applicants during the permitting process. Together with the lease stipulations, the ROPs also provide a basis for analyzing the potential impacts of the alternatives in this Leasing SEIS. Similar to stipulations, the objective of a ROP must be met in order for exceptions, modifications, or waivers to be granted.

Any applicant requesting authorization for an activity from the BLM will have to address the applicable ROPs in one of the following ways:

- Before submitting the application (e.g., performing and documenting subsistence consultation or surveys)
- As part of the application proposal (e.g., including in the proposal statements that the applicant will meet the objective of the ROP and how the applicant intends to achieve that objective)
- As a term imposed by the BLM in a permit or right-of-way authorization

At the permitting stage, the BLM Authorized Officer would not include those ROPs that, because of their location or other inapplicability, are not relevant to a specific land use authorization application. Note also that at the permitting stage, the BLM Authorized Officer may establish additional requirements as warranted to protect the land, resources, and uses in accordance with the BLM's responsibilities under relevant laws and regulations.

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**Table 2-3
Lease Stipulations and Required Operating Procedures by Action Alternative¹**

Alternative B	Alternative C	Alternative D	Alternative D2
LEASE STIPULATIONS			
PROTECTIONS THAT APPLY IN SELECT BIOLOGICALLY SENSITIVE AREAS			
<p>Lease Stipulation 1—Rivers and Streams (Map 2-2)</p> <p><u>Objective:</u> Minimize the disruption of natural flow patterns and changes to water quality; the disruption of natural functions resulting from the loss or change to vegetative and physical characteristics of floodplain and riparian areas, springs, and aufeis; the loss of spawning, rearing, or overwintering fish habitat; the loss of cultural and paleontological resources; the loss of raptor habitat; impacts on subsistence cabins and campsites; and the disruption of subsistence activities.</p> <p><u>Requirement/Standard:</u> (NSO) Permanent oil and gas facilities, including gravel pads, roads, airstrips, and pipelines, are prohibited in the streambed and within the described setback distances outlined below, from the southern boundary of the Coastal Plain to the stream mouth. For streams that are entirely in the Coastal Plain, the setback extends to the head of the stream, as identified in the National Hydrography Dataset. Essential pipelines and road crossings would be permitted through setback areas in accordance with Section 20001(c)(2) of PL 115-97. Gravel mines could be permitted in setback areas. Setbacks may not be practical in river deltas; in these situations, an exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to locating facilities in these areas; (2) the proposed actions would maintain or enhance resource functions; and (3) permanent facilities are designed to withstand a 100-year flood.</p> <ul style="list-style-type: none"> a. Canning River: from the western boundary of the Coastal Plain to 1 mile east of the eastern edge of the active floodplain b. Hulahlula River: 1 mile in all directions from the active floodplain c. Aichilik River: 1 mile from the eastern edge of the Coastal Plain boundary d. Okpilak River: 1 mile from the banks' ordinary high-water mark e. Jago River: 1 mile from the banks' ordinary high-water mark f. The following rivers and creeks will have a 0.5-mile setback from the banks' ordinary high-water mark: <ul style="list-style-type: none"> i. Sadlerochit River ii. Tamayariak River iii. Okerokovik River iv. Katakaturuk River v. Marsh Creek 	<p>Lease Stipulation 1—Rivers and Streams (Map 2-4)</p> <p><u>Objective:</u> Minimize the disruption of natural flow patterns and changes to water quality; the disruption of natural functions from the loss or change to vegetative and physical characteristics of floodplain and riparian areas, springs, and aufeis; the loss of spawning, rearing, or overwintering habitat for fish; the loss of cultural and paleontological resources; the loss of raptor habitat; impacts on subsistence cabins and campsites; the disruption of subsistence activities; impacts on hunting and recreation; and impacts on scenic and other resource values. Protect the water quality, quantity, and diversity of fish and wildlife habitats and populations associated with springs and aufeis across the Coastal Plain.</p> <p><u>Requirement/Standard:</u> (NSO) Same NSO requirements as Alternative B. River setback distances under Alternative C are the following:</p> <ul style="list-style-type: none"> a. Canning River: From the western boundary of the Coastal Plain to 3 miles east of the eastern edge of the active floodplain b. Hulahlula River: 4 miles in all directions from the active floodplain c. Aichilik River: 3 miles from the eastern edge of the Coastal Plain boundary d. Okpilak River: 3 miles from the banks' ordinary high-water mark e. The following rivers would have a 1-mile setback from the banks' ordinary high-water mark: <ul style="list-style-type: none"> i. Sadlerochit River ii. Jago River f. The following rivers and creeks would have a 0.5-mile setback from the banks' ordinary high-water mark: <ul style="list-style-type: none"> i. Tamayariak River ii. Katakaturuk River iii. Nularvik River iv. Okerokovik River v. Niguanak River vi. Sikrelurak River vii. Angun River viii. Kogotpak River ix. Marsh Creek x. Carter Creek xi. Itkilyariak Creek 	<p>Lease Stipulation 1 – Rivers and Streams (Map 2-6)</p> <p><u>Objective:</u> Minimize the disruption of natural flow patterns and changes to water quality; the disruption of natural functions resulting from the loss or change to vegetative and physical characteristics of floodplain and riparian areas, springs, and aufeis; the loss of spawning, rearing, or overwintering fish habitat; the loss of cultural and paleontological resources; the loss of raptor habitat; impacts on subsistence cabins and campsites; the disruption of subsistence activities; impacts on hunting and recreation, and impacts on scenic and other resource values. Protect the water quality, quantity, and diversity of fish and wildlife habitats and populations associated with springs and aufeis across the Coastal Plain.</p> <p><u>Requirement/Standard:</u> (NSO) Permanent oil and gas facilities, including gravel pads, roads, airstrips, and pipelines, are prohibited in the streambed and within the described setback distances outlined below, from the southern boundary of the Coastal Plain to the stream mouth. For streams that are entirely in the Coastal Plain, the setback extends to the head of the stream, as identified in the National Hydrography Dataset. Pipelines and road crossings that are essential to carry out operations would be permitted through setback areas in accordance with Section 20001(c)(2) of PL 115-97, which requires issuance of rights-of-way or easements across the Coastal Plain for the exploration, development, production, or transportation necessary to carry out Section 20001. Gravel mines could be permitted in setback areas near rivers and streams that do not support resident, anadromous, or endemic fish populations. Setbacks may not be practical in river deltas; in these situations, an exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to locating facilities in these areas; (2) the proposed actions would maintain resource functions; and (3) permanent facilities are designed to withstand a 100-year flood.</p> <ul style="list-style-type: none"> a. Canning/Staines River: From the western boundary of the Coastal Plain to 3 miles east of the eastern edge of the active floodplain b. Hulahlula River: 4 miles in all directions from the active floodplain c. Sadlerochit Spring Creek: 3 miles in all directions from the active floodplain d. Aichilik River: 3 miles from the eastern edge of the Coastal Plain boundary 	<p>Lease Stipulation 1 – Rivers and Streams (Map 2-8)</p> <p><u>Objective:</u> Minimize the disruption of natural flow patterns and changes to water quality; the disruption of natural functions resulting from the loss or change to vegetative and physical characteristics of floodplain and riparian areas, springs, and aufeis; the loss of spawning, rearing, or overwintering fish habitat; the loss of cultural and paleontological resources; the loss of raptor habitat; the disruption to polar bear denning habitat; impacts on subsistence cabins and campsites; the disruption of subsistence activities; impacts on hunting and recreation, and impacts on scenic and other resource values. Protect the water quality, quantity, and diversity of fish and wildlife habitats and populations associated with springs and aufeis across the Coastal Plain.</p> <p><u>Requirement/Standard:</u> (NSO) Permanent oil and gas facilities, including gravel pads, roads, airstrips, and pipelines, are prohibited in the streambed and within the described setback distances outlined below, from the southern boundary of the Coastal Plain to the stream mouth. For streams that are entirely in the Coastal Plain, the setback extends to the head of the stream, as identified in the National Hydrography Dataset. Pipelines and road crossings that are essential to carry out operations would be permitted through setback areas in accordance with Section 20001(c)(2) of PL 115-97, which requires issuance of rights-of-way or easements across the Coastal Plain for the exploration, development, production, or transportation necessary to carry out Section 20001. Gravel mines could be permitted in setback areas near rivers and streams that do not support resident, anadromous, or endemic fish populations.</p> <p><u>Exceptions:</u> All exception requests will be coordinated between the BLM Authorized Officer and the USFWS as surface manager.</p> <ul style="list-style-type: none"> 1. Setbacks may not be practical in river deltas; in these situations, an exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to locating facilities in these areas; (2) the proposed action would maintain resource functions; (3) permanent facilities are designed to withstand a 100-year flood; and (4) the proposed action complies with other applicable laws. 2. In NSO areas a one-time exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to accessing subsurface resources; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws.

¹While the language in **Table 2-3** refers only to the BLM or its Authorized Officer, it is understood that all activities, including plan development, study development, and consideration of exceptions, modifications, or waivers, and any operations that will be conducted on the surface of the Arctic Refuge would include close coordination with the USFWS to ensure that the surface management agency's considerations are taken into account, and, if necessary, consultation under the ESA. In addition, the BLM would coordinate with other appropriate federal, state, and NSB agencies, Tribal Governments, ANCSA corporations, and other Native organizations as appropriate.

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	<p>e. The following rivers and creeks would have a 1-mile setback from the active floodplain:</p> <ul style="list-style-type: none"> i. Sadlerochit River ii. Jago River iii. Itkilyariak Creek <p>f. The following rivers and creeks would have a 0.5-mile setback from the active floodplain:</p> <ul style="list-style-type: none"> i. West Fork Tamayariak River ii. Middle Fork Tamayariak River iii. Tamayariak River iv. Katakturuk River v. Nularvik River vi. Okerokovik River vii. Niguanak River viii. Angun River ix. Kogotpak River x. Okpilak River <p>g. The following rivers and creeks would have a 0.25-mile setback from the active floodplain:</p> <ul style="list-style-type: none"> i. Kajutaakrok River ii. Nataroatuk River iii. Akutotuk River iv. Okpirourak Creek v. Marsh Creek vi. Carter Creek vii. Sikrelurak River viii. Igilatvik River ix. John River x. Pokok River xi. Kimikpaurauk River xii. Siksik River xiii. Any other unnamed river 	<p>a. Canning/Staines River: From the western boundary of the Coastal Plain to 3 miles east of the eastern edge of the active floodplain</p> <p>b. Hulahula River: 4 miles in all directions from the active floodplain</p> <p>c. Sadlerochit Spring Creek: 3 miles in all directions from the active floodplain</p> <p>d. Aichilik River: 3 miles from the eastern edge of the Coastal Plain boundary</p> <p>e. The following rivers and creeks would have a 1-mile setback from the active floodplain:</p> <ul style="list-style-type: none"> i. Sadlerochit River ii. Jago River iii. Itkilyariak Creek <p>f. The following rivers and creeks would have a 0.5-mile setback from the active floodplain:</p> <ul style="list-style-type: none"> i. West Fork Tamayariak River ii. Middle Fork Tamayariak River iii. Tamayariak River iv. Katakturuk River v. Nularvik River vi. Okerokovik River vii. Niguanak River viii. Angun River ix. Kogotpak River x. Okpilak River xi. Marsh Creek xii. Carter Creek <p>g. The following rivers and creeks would have a 0.25-mile setback from the active floodplain:</p> <ul style="list-style-type: none"> i. Kajutaakrok River ii. Nataroatuk River iii. Akutotuk River iv. Okpirourak Creek v. Sikrelurak River vi. Igilatvik River vii. John River viii. Pokok River ix. Kimikpaurauk River x. Siksik River

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Lease Stipulation 2—Canning River Delta and Lakes</p> <p><u>Objective:</u> Protect and minimize adverse effects on the water quality, quantity, and diversity of fish and wildlife habitats and populations, subsistence resources, and cultural resources; protect and minimize the disruption of natural flow patterns and changes to water quality, the disruption of natural functions resulting from the loss or change to vegetation and physical characteristics of floodplain and riparian areas; the loss of passage, spawning, rearing, or overwintering habitat for fish; the loss of cultural and paleontological resources; and adverse effects to migratory birds.</p> <p><u>Requirement/Standard:</u> See ROP 9 for additional requirements/standards.</p>	<p>Lease Stipulation 2—Canning River Delta and Lakes (Map 2-4)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> (NSO) Permanent oil and gas facilities, including gravel pads, roads, airstrips, and pipelines, are prohibited within 0.5 miles of the ordinary high-water mark of any waterbody² in Townships 8 and 9, north of the Canning and Tamayariak watersheds. Essential pipelines, road crossings, gravel mines, and other permanent facilities may be considered through the permitting process in these areas where the lessee/operator/contractor can demonstrate on a site-specific basis that impacts would be minimal.</p>	<p>Lease Stipulation 2—Canning River Delta and Lakes (Map 2-6)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> (NSO) Permanent oil and gas facilities, including gravel pads, roads, airstrips, and pipelines, are prohibited within 0.5 miles of the active floodplain of any waterbody in T9N R24E, T9N R25E, T8N, R24E, T8N R25E, T8N R26E, T8N R27E within the Canning and Tamayariak watersheds. Pipelines and road crossings that are essential to carry out operations may be considered through setback areas in accordance with Section 20001(c)(2) of PL 115-97, which requires issuance of rights-of-way or easements across the Coastal Plain for the exploration, development, production, or transportation necessary to carry out Section 20001.</p>	<p>Lease Stipulation 2—Canning River Delta and Lakes (Map 2-8)</p> <p><u>Objective:</u> Same as Alternative B. Also, minimize the disruption to polar bear denning habitat.</p> <p><u>Requirement/Standard:</u> (NSO) Permanent oil and gas facilities, including gravel pads, roads, airstrips, and pipelines, are prohibited within 0.5 miles of the active floodplain of any waterbody in T9N R24E, T9N R25E, T8N, R24E, T8N R25E, T8N R26E, T8N R27E within the Canning and Tamayariak watersheds. Pipelines and road crossings that are essential to carry out operations may be considered through setback areas in accordance with Section 20001(c)(2) of PL 115-97, which requires issuance of rights-of-way or easements across the Coastal Plain for the exploration, development, production, or transportation necessary to carry out Section 20001.</p> <p><u>Exceptions:</u> All exception requests will be coordinated between the BLM Authorized Officer and the USFWS as surface manager.</p> <p>1. In NSO areas a one-time exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to accessing subsurface resources; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws.</p>
<p>Lease Stipulation 3—Springs/Aufeis</p> <p><u>Objective:</u> Protect the water quality, quantity, and diversity of fish and wildlife habitats and populations associated with springs and aufeis across the Coastal Plain. River systems with springs provide year-round habitat and host the most diverse and largest populations of fish, aquatic invertebrates, and wildlife; they are associated with major subsistence activity and cultural resources. An aufeis is a unique feature associated with perennial springs. It helps sustain river flow during summer and provides insect relief for caribou. Because the subsurface flow paths to perennial springs are unknown and could be disturbed by drilling, use buffer areas around the major perennial springs that support fish populations in which no leasing is permitted.</p> <p><u>Requirement/Standard:</u></p> <p>a. Before drilling, the lessee/operator/permittee would conduct studies to ensure drilling or other surface activities would not disrupt flow to or from the perennial springs and waste injection wells will not contaminate any perennial springs. Study plans would be developed in consultation with the BLM, USFWS, and other agencies, as appropriate.</p> <p>See Lease Stipulation 1 for additional requirements/standards.</p>	<p>Lease Stipulation 3—Springs/Aufeis (Map 2-4)³</p> <p><u>Objective:</u> Same as Alternative B.</p> <p>The Sadlerochit Spring supports an isolated, dwarf population of Dolly Varden, unique plant and invertebrate communities, and an extensive aufeis field that persists through much of the summer, providing insect-relief habitat for caribou. The Fish Hole 1 spring provides overwintering habitat for arctic grayling and a large population of anadromous Dolly Varden. Residents of Kaktovik routinely harvest Dolly Varden in Fish Hole 1 during winter. The spring produces an extensive aufeis field that persists through much of the summer. The Canning River is the largest river crossing the Coastal Plain. It has several perennial springs originating upstream of the Coastal Plain that provide steady flow under ice across the Coastal Plain. The river supports several fish species, including arctic grayling and a large population of anadromous Dolly Varden. Aufeis fills the river corridor across the Coastal Plain and extends well into the delta, providing insect relief to caribou during the early summer.</p> <p><u>Requirement/Standard:</u> Same as Alternative B, with the addition of the following areas identified that would not be offered for lease sale or identified as NSO:</p> <p>a. <u>No leasing</u> and no new infrastructure would be permitted within 3 miles adjacent to or above Sadlerochit Spring (04N031E) nor within a 1-mile buffer below the spring to where it enters the Sadlerochit River and along the aufeis formation (04N031E and 05N031E).</p>	<p>Lease Stipulation 3—Springs/Aufeis (Map 2-6)³</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>a. <u>No leasing</u> and no new infrastructure would be permitted within 3 miles adjacent to or above Sadlerochit Spring (04N031E) nor within a 1-mile buffer in all directions from the active floodplain from Sadlerochit Spring to its confluence with Itkilyariak Creek and downstream to a location 1 mile below the point at which Itkilyariak Creek enters the Sadlerochit River and along the associated aufeis formation (04N031E and 05N031E).</p> <p>b. <u>No leasing</u> and no new infrastructure would be permitted within 4 miles adjacent to or above the perennial spring at Fish Hole 1 on the Hulahula River (05N032E) nor within 1 mile of the associated aufeis field (05N032E and 06N032E).</p> <p>c. <u>No leasing</u> and no new infrastructure would be permitted within 3 miles adjacent to or above the perennial Tamayariak Spring, and no new infrastructure would be permitted within 1 mile of the associated aufeis field (07N026E).</p> <p>d. <u>No leasing</u> and no new infrastructure would be permitted within 3 miles adjacent to or above the perennial Okerokovik Spring (04N036E) and associate aufeis field.</p> <p>e. Before drilling, the lessee/operator/permittee would conduct studies to ensure drilling or other surface activities would not disrupt flow to or from the perennial springs and waste injection wells would not contaminate any perennial springs. Study plans would be developed in consultation with the BLM, USFWS, Tribal Governments, State of Alaska, and other agencies, as appropriate and incorporate local indigenous knowledge, when available.</p>	<p>Lease Stipulation 3—Springs/Aufeis (Map 2-8)³</p> <p><u>Objective:</u> Same as Alternative B. Also, minimize the disruption to polar bear denning habitat.</p> <p><u>Requirement/Standard:</u></p> <p>a. <u>No leasing</u> and no new infrastructure would be permitted within 3 miles adjacent to or above Sadlerochit Spring (04N031E) nor within a 1-mile buffer in all directions from the active floodplain from Sadlerochit Spring to its confluence with Itkilyariak Creek and downstream to a location 1 mile below the point at which Itkilyariak Creek enters the Sadlerochit River and along the associated aufeis formation (04N031E and 05N031E).</p> <p>b. <u>No leasing</u> and no new infrastructure would be permitted within 4 miles adjacent to or above the perennial spring at Fish Hole 1 on the Hulahula River (05N032E) nor within 1 mile of the associated aufeis field (05N032E and 06N032E).</p> <p>c. <u>No leasing</u> and no new infrastructure would be permitted within 1 mile adjacent to or above the perennial Tamayariak Spring, and no new infrastructure would be permitted within 1 mile of the associated aufeis field (07N026E).</p> <p>d. <u>No leasing</u> and no new infrastructure would be permitted within 3 miles adjacent to or above the perennial Okerokovik Spring (04N036E) and associate aufeis field.</p> <p>e. Before drilling, the lessee/operator/permittee would conduct studies to ensure drilling or other surface activities would not disrupt flow to or from the perennial springs and waste injection wells would not contaminate any perennial springs. Study plans would be developed in consultation with the BLM, USFWS, Tribal Governments, State of Alaska, and other agencies, as appropriate and incorporate local indigenous knowledge, when available.</p>

²For the purposes of this document, waterbody is defined as any feature included in the National Hydrography Dataset. This is a feature-based database that interconnects and uniquely identifies the stream segments or reaches that make up the nation's surface water drainage system.

³For Alternatives C and D under Lease Stipulation 3, the 1-mile and 3-mile buffers were derived from similar distances used in the NRP-A IAP/EIS and best professional judgement from the joint lead agencies for the Coastal Plain program area.

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	<p><u>No leasing</u> would be permitted within 3 miles adjacent to or above the perennial spring at Fish Hole 1 on the Hulahula River (05N032E). Further, no new infrastructure would be permitted within 4 miles of the perennial spring at Fish Hole 1 on the Hulahula River (05N032E), per Lease Stipulation 1, nor within 1 mile of the aufeis field (05N032E and 06N032E).</p> <p>b. <u>No leasing</u> would be permitted within 3 miles adjacent to or above the perennial Tamayariak Spring, and no new infrastructure would be permitted within 1 mile of the associated aufeis field (07N026E).</p> <p>c. <u>No leasing</u> would be permitted within 3 miles adjacent to or above the perennial Okerokavik Spring (04N036E), and no new infrastructure would be permitted within 1 mile of the associated aufeis field in the Jago River drainage (05N035E and 05N036E).</p> <p>d. <u>NSO</u> from the western boundary of the Coastal Plain to 3 miles east of the eastern edge of the active floodplain of the Canning River.</p>	(see above)	(see above)
<p>Lease Stipulation 4—Nearshore marine, lagoon, and barrier island habitats of the Southern Beaufort Sea within the boundary of the Arctic Refuge (Map 2-2)</p> <p><u>Objective:</u> Protect fish and wildlife habitat, including that for waterfowl and shorebirds, caribou insect relief, marine mammals, and polar bear summer and winter coastal habitat; preserve air and water quality; and minimize impacts on subsistence activities, recreation, historic travel routes, and cultural resources in the nearshore marine area.</p> <p><u>Requirement/Standard:</u> (NSO) Exploratory well drill pads, production well drill pads, or a CPF for oil or gas would not be permitted in nearshore marine waters, lagoons, or barrier islands within the boundaries of the Coastal Plain.</p> <p>a. The BLM Authorized Officer may approve infrastructure for oil and gas activities necessary to be located in these critical and sensitive habitats, such as barge landing, docks, spill response staging and storage areas, and pipelines.</p> <p>b. Before conducting open water activities, the lessee/operator/contractor would consult with the Alaska Eskimo Whaling Commission, the NSB, and local whaling captains' associations to minimize impacts on subsistence whaling and other subsistence activities of the communities of the North Slope. In a case in which the BLM authorizes permanent oil and gas infrastructure in the nearshore marine area, the lessee/operator/contractor would develop and implement an impact and conflict avoidance and monitoring plan. This would be used to assess, minimize, and mitigate the effects of the infrastructure and its use on these nearshore marine area habitats and their use by wildlife and people, including the following:</p> <p>i. Design and construct facilities to minimize impacts on subsistence uses, travel corridors, and seasonally concentrated fish and wildlife resources.</p>	<p>Lease Stipulation 4—Nearshore marine, lagoon, and barrier island habitats of the Southern Beaufort Sea within the boundary of the Arctic Refuge (Map 2-4)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> (NSO) Same as Alternative B, with the following additional requirements:</p> <p>a. The BLM Authorized Officer may approve infrastructure necessary for oil and gas activities in these critical and sensitive habitats, such as barge landing, docks, spill response staging and storage areas, and pipelines. Approval would be on a case-by-case basis, in consultation with the USFWS or NMFS or both, as appropriate.</p> <p>b. All lessees/operators/contractors involved in authorized activities in nearshore marine waters must coordinate construction and use infrastructure with all other prospective Arctic Refuge users or user groups, which may be accomplished through public notice and coordination with users in affected communities. Before conducting open water activities, the lessee/operator/contractor would consult with the Alaska Eskimo Whaling Commission, the NSB, and local whaling captains' associations to minimize impacts on subsistence whaling and other subsistence activities of the communities of the North Slope.</p> <p>c. (TL) Oil and gas exploration operations, such as drilling, seismic exploration, and testing, are not allowed on the major nearshore marine waters, lagoons, barrier islands, and coastal islands between May 15 and November 1 or when sea ice edge (as defined by Fetterer et al. 2017) is 10 miles distant or greater from the coast each season, whichever is later. Requests for approval of any activities must be submitted in advance and must be accompanied by evidence and documentation that demonstrates to the satisfaction of</p>	<p>Lease Stipulation 4—Nearshore marine, lagoon, and barrier island habitats of the Southern Beaufort Sea within the boundary of the Coastal Plain (Map 2-6)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> (NSO) Exploratory well drill pads, production well drill pads, or a CPF for oil or gas would not be permitted in nearshore marine waters, lagoons, or barrier islands within the boundaries of the Coastal Plain.</p> <p>a. The BLM Authorized Officer, in coordination with Tribal Governments, may approve infrastructure necessary for oil and gas activities in these critical and sensitive habitats, such as barge landing, docks, spill response staging and storage areas, and seawater pipelines. Approval would be on a case-by-case basis, in consultation with the USFWS, NMFS both, subsistence users, and other Arctic Refuge users or user groups, as appropriate.</p> <p>b. All lessees/operators/contractors involved in authorized activities in nearshore marine waters must coordinate construction and use infrastructure with all other prospective Arctic Refuge users or user groups.</p> <p>c. Before conducting open water activities, the lessee/operator/contractor would consult with the Alaska Eskimo Whaling Commission, the NSB, Alaska Nanuut Co-management Council, the Inuvialuit-Inupiat Agreement, and local whaling captains' associations to minimize impacts on subsistence whaling and other subsistence activities of the communities of the North Slope. In a case in which the BLM authorizes permanent oil and gas infrastructure in the nearshore marine area, the lessee/operator/contractor shall develop and implement an impact and conflict avoidance and monitoring plan which would utilize a monitoring and adaptive management approach. This plan would be used to assess, minimize, and mitigate the effects of the infrastructure and its use on these nearshore marine area habitats and their use by wildlife and people.</p>	<p>Lease Stipulation 4—Nearshore marine, lagoon, and barrier island habitats of the Southern Beaufort Sea within the boundary of the Coastal Plain (Map 2-8)</p> <p><u>Objective:</u> Same as Alternative B. Also, minimize the disruption to polar bear denning habitat and disturbance to bears using near shore areas.</p> <p><u>Requirement/Standard:</u> (NSO) Exploratory well drill pads, production well drill pads, or a CPF for oil or gas would not be permitted in nearshore marine waters, lagoons, or barrier islands within the boundaries of the Coastal Plain.</p> <p><u>Exceptions:</u> All exception requests will be coordinated between the BM Authorized Officer and the USFWS as surface manager.</p> <p>1. In NSO areas a one-time exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to accessing subsurface resources; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws.</p> <p>2. The BLM Authorized Officer may approve infrastructure necessary for oil and gas development in these critical and sensitive habitats, such as barge landings, docks, spill response staging and storage areas, and seawater pipelines if the operator can demonstrate: (1) there are no practical alternatives to locating such facilities in these areas; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws. Approval would be on a case-by-case basis, in consultation with the USFWS, NMFS or both as appropriate, local Tribal Governments, subsistence users, and other Arctic Refuge users or user groups, as appropriate.</p> <p>a. All lessees/operators/contractors involved in authorized activities in nearshore marine waters must coordinate construction and use infrastructure with all other prospective Arctic Refuge users or user groups.</p> <p>b. Before conducting open water activities, the lessee/operator/contractor would consult with the Alaska Eskimo Whaling Commission, the NSB, Alaska Nanuut Co-management Council,</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>ii. Daily operations, including use of support vehicles, watercraft, and aircraft, alone or in combination with other past, present, and reasonably foreseeable activities, would be conducted to minimize impacts on subsistence and other public uses, travel corridors, and seasonally concentrated fish and wildlife resources.</p> <p>iii. The location of oil and gas facilities, including artificial islands, platforms, associated pipelines, ice or other roads, and bridges or causeways, would be sited and constructed to not pose a hazard to public navigation, using traditional high-use subsistence-related travel routes into and through the major coastal lagoons and bays, as identified by the community of Kaktovik and the NSB.</p> <p>iv. Operators would be responsible for developing comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and Spill Prevention, Control, and Countermeasure plans and maintain adequate oil spill response capability to effectively respond during periods of ice, broken ice, or open water, based on the statutes, regulations, and guidelines of the USFWS, EPA, Alaska Department of Environmental Conservation (ADEC), and the Bureau of Safety and Environmental Enforcement (BSEE), as well as ROPs, stipulations, and policy guidelines of the BLM.</p>	<p>i. the BLM Authorized Officer that the actions or activities meet all the following criteria: Exploration would not unreasonably conflict with subsistence uses or significantly affect seasonally concentrated fish and wildlife resources. The location of exploration and related activities would be sited to not pose a hazard to navigation by the public using high-use, subsistence-related travel routes into and through the nearshore marine waters, as identified by the NSB and the Native Village of Kaktovik, recognizing that marine and nearshore travel routes change over time and are subject to shifting environmental conditions.</p>	<p>d. (TL) Oil and gas exploration operations, such as drilling, seismic exploration, and testing, are not allowed on the major nearshore marine waters, lagoons, barrier islands, and coastal islands between May 15 and November 1 or when sea ice edge (as defined by Fetterer et al. 2017) is 10 miles distant or greater from the coast each season, whichever is later. Requests for approval of any activities must be submitted in advance and must be accompanied by evidence and documentation that demonstrates to the satisfaction of the BLM Authorized Officer that the actions or activities meet all the following criteria:</p> <ul style="list-style-type: none"> i. Exploration would not unreasonably conflict with subsistence uses or significantly affect seasonally concentrated fish and wildlife resources. The location of exploration and related activities would be sited to not pose a hazard to navigation by the public using high-use, subsistence-related travel routes into and through the nearshore marine waters, as identified by the NSB and the Native Village of Kaktovik, recognizing that marine and nearshore travel routes change over time and are subject to shifting environmental conditions. ii. Design and construct facilities to minimize impacts on subsistence uses, travel corridors, and seasonally concentrated fish and wildlife resources. iii. Daily operations, including use of support vehicles, watercraft, and aircraft, alone or in combination with other past, present, and reasonably foreseeable activities, would be conducted to minimize impacts on subsistence and other public uses, travel corridors, and seasonally concentrated fish and wildlife resources. iv. The location of oil and gas facilities, including artificial islands, platforms, associated pipelines, ice or other roads, and bridges or causeways, would be sited and constructed to not pose a hazard to public navigation, using traditional high-use subsistence-related travel routes into and through the major coastal lagoons and bays, as identified by the community of Kaktovik and the NSB. v. Operators would be responsible for developing comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and Spill Prevention, Control, and Countermeasure plans and maintain adequate oil spill response capability to effectively respond during periods of ice, broken ice, or open water, based on the statutes, regulations, and guidelines of the USFWS, EPA, Alaska Department of Environmental Conservation (ADEC), and the Bureau of Safety and Environmental Enforcement (BSEE), as well as ROPs, stipulations, and policy guidelines of the BLM. 	<p>the Inuvialuit-Inupiat Agreement, and local whaling captains' associations to minimize impacts on subsistence whaling and other subsistence activities of the communities of the North Slope. In a case in which the BLM authorizes permanent oil and gas infrastructure in the nearshore marine area, the lessee/operator/contractor shall develop and implement an impact and conflict avoidance and monitoring plan which would utilize a monitoring and adaptive management approach. This plan would be used to assess, minimize, and mitigate the effects of the infrastructure and its use on these nearshore marine area habitats and their use by wildlife and people.</p> <p>c. (TL) Oil and gas activities such as drilling, seismic exploration, and testing, are not allowed on the major nearshore marine waters, lagoons, barrier islands, and coastal islands between May 15 and November 1 or when sea ice edge (as defined by Fetterer et al. 2017) is 10 miles distant or greater from the coast each season, whichever is later. Requests for approval of any activities between November 2-May 14 must be submitted in advance and must be accompanied by evidence and documentation that demonstrates to the Authorized Officer (who will review in coordination with the USFWS) that the actions or activities meet all the following criteria:</p> <ul style="list-style-type: none"> i. Exploration would not unreasonably conflict with subsistence uses or significantly affect seasonally concentrated fish and wildlife resources. The location of exploration and related activities would be sited to not pose a hazard to navigation by the public using high-use, subsistence-related travel routes into and through the nearshore marine waters, as identified by the NSB and the Native Village of Kaktovik, recognizing that marine and nearshore travel routes change over time and are subject to shifting environmental conditions. ii. Design and construct facilities to minimize impacts on subsistence uses, travel corridors, and seasonally concentrated fish and wildlife resources. iii. Daily operations, including use of support vehicles, watercraft, and aircraft, alone or in combination with other past, present, and reasonably foreseeable activities, would be conducted to minimize impacts on subsistence and other public uses, travel corridors, and seasonally concentrated fish and wildlife resources. iv. The location of oil and gas facilities, including artificial islands, platforms, associated pipelines, ice or other roads, and bridges or causeways, would be sited and constructed to not pose a hazard to public navigation, using traditional high-use subsistence-related travel routes into and through the major coastal lagoons and bays, as identified by the community of Kaktovik and the NSB. v. Operators would be responsible for developing comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and Spill Prevention, Control, and Countermeasure plans and maintain adequate oil spill response capability to effectively respond during periods of ice, broken ice, or open water, based on the statutes, regulations, and guidelines of the USFWS, EPA, Alaska Department of Environmental Conservation (ADEC), and the Bureau of Safety and Environmental Enforcement (BSEE), as well as ROPs, stipulations, and policy guidelines of the BLM.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Lease Stipulation 5—Coastal Polar Bear Denning River Habitat</p> <p><u>Objective:</u> Minimize disturbance to denning polar bears, and disturbance or alteration of key river and creek maternal denning habitat areas.</p> <p><u>Requirement/Standard:</u> Comply with ESA and Marine Mammal Protection Act (MMPA) requirements.</p>	<p>Lease Stipulation 5—Coastal Polar Bear Denning River Habitat (Map 2-4)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Comply with ESA and MMPA requirements. The following requirements/standards apply from the coastline to 5 miles inland within the program area boundary.</p> <p>a. (NSO) From the coastline to 5 miles inland, no permanent oil and gas infrastructure would be within 1 mile of potential polar bear denning habitat on the Niguanak River, Katakturuk River, Marsh Creek, Carter Creek, and Sadlerochit River, and all associated tributaries as defined by Durner et al. (2006), unless the BLM Authorized Officer approves alternative protective measures.</p> <p>b. (TL) From the coastline to 5 miles inland, between October 30 and April 15 of any year, the lessee/operator/contractor would not conduct oil and gas activities within 1 mile of potential polar bear denning habitat on the Niguanak River, Katakturuk River, Marsh Creek, Carter Creek, and Sadlerochit River, and all associated tributaries as defined by Durner et al. (2006), unless the BLM Authorized Officer approves alternative protective measures.</p>	<p>Lease Stipulation 5—Coastal Polar Bear Denning River Habitat (Map 2-6)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Comply with ESA and MMPA requirements, with the following additional requirements/standards applying from the coastline to 5 miles inland within the program area boundary.</p> <p>a. (NSO) From the coastline to 5 miles inland, no permanent oil and gas infrastructure would be permitted within 1 mile of potential polar bear denning habitat on the Canning River, Niguanak River, Katakturuk River, Marsh Creek, Carter Creek, and Sadlerochit River, and all associated tributaries as defined by Durner et al. (2006), unless the BLM Authorized Officer approves alternative protective measures.</p> <p>b. Any infrastructure permitted within 5 miles inland of the coastline must be designed to avoid impeding polar bears seeking to establish or leave dens inland.</p> <p>c. (TL) From the coastline to 5 miles inland, between October 30 and April 30 of any year, the lessee/operator/contractor would not conduct oil and gas activities within 1 mile of potential polar bear denning habitat on the Niguanak River, Katakturuk River, Marsh Creek, Carter Creek, and Sadlerochit River, and all associated tributaries as defined by Durner et al. (2006), unless the BLM Authorized Officer approves alternative protective measures.</p>	<p>Lease Stipulation 5—Coastal Polar Bear Denning River Habitat (Map 2-8)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Comply with ESA and MMPA requirements, with the following additional requirements/standards applying from the coastline to 5 miles inland within the program area boundary.</p> <p><u>Exceptions:</u> All exception requests will be coordinated between the BLM Authorized Officer and the USFWS as surface manager.</p> <p>1. In NSO areas a one-time exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to accessing subsurface resources; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws.</p> <p>2. No leasing: From the coast to 1-mile inland along the coastline of the critical denning habitat in the Northwest portion of the 1002 Area near the Canning/Staines Rivers and in the Camden Bay area.</p> <p>a. (NSO) From the coastline to 5 miles inland, no permanent oil and gas infrastructure would be permitted within 1 mile of potential polar bear denning habitat on the Canning/Staines River, Niguanak River, Katakturuk River, Marsh Creek, Carter Creek, and Sadlerochit River, and all associated tributaries as defined by Durner et al. (2006).</p> <p>b. Any infrastructure permitted within 5 miles inland of the coastline must be designed to avoid impeding polar bears seeking to establish or leave dens inland.</p> <p>c. (TL) From the coastline to 5 miles inland, between October 30 and April 30 of any year, the lessee/operator/contractor would not conduct oil and gas activities, such as drilling, seismic exploration, and testing, within 1 mile of potential polar bear denning habitat on the Niguanak River, Katakturuk River, Marsh Creek, Carter Creek, Canning/Staines and Sadlerochit River, and all associated tributaries as defined by Durner et al. (2006), unless the BLM Authorized Officer, in coordination with the USFWS, approves alternative protective measures.</p> <p>d. (TL) From the coastline to 2 miles inland, between October 30 and April 30 of any year, the lessee/operator/contractor would not conduct oil and gas activities, such as drilling, seismic exploration, and testing.</p>
<p>Lease Stipulation 6—Caribou Summer Habitat</p> <p><u>Note:</u> All lands in the Arctic Refuge Coastal Plain are recognized as habitat of the PCH⁴ and CAH⁵ and would be managed to allow for unhindered movement of caribou through the area.</p> <p><u>Objective:</u> Minimize disturbance and hindrance of caribou or alteration of caribou movements.</p> <p><u>Requirement/Standard:</u> See ROP 23.</p>	<p>Lease Stipulation 6—Caribou Summer Habitat (Map 2-4)</p> <p><u>Note:</u> Same as Alternative B.</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Same as Alternative B.</p>	<p>Lease Stipulation 6—Caribou Calving, Post-calving, and Insect Relief (Map 2-6)</p> <p><u>Note:</u> All lands in the Arctic Refuge Coastal Plain are recognized as habitat of the PCH and CAH and would be managed to allow for unhindered movement and use by caribou.</p> <p>a. PCH projected calving and post-calving habitat areas are defined following those identified by Severson et al. (2021) for the projected 2050-2059 ranges.</p>	<p>Lease Stipulation 6—Caribou Calving, Post-calving, and Insect Relief (Map 2-8)</p> <p><u>Note:</u> All lands in the Arctic Refuge Coastal Plain are recognized as habitat of the PCH and CAH and would be managed to allow for unhindered movement and use by caribou. The portion of the CAH range that could be affected is encompassed within the range of the PCH.</p>

⁴For purposes of the table, PCH is used for Porcupine Caribou Herd

⁵For the purposes of the table, CAH is used for the Central Arctic Herd

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	<p>b. PCH comprehensive calving habitat area is inclusive of <u>current</u> PCH calving habitat, defined as the area used in the 2019 FEIS (BLM 2019) for calving (based on annual 95 percent contours calculated using kernel density estimation of parturient female caribou locations May 26-June 10 during more than 40 percent of the years surveyed), <u>plus</u> the addition of portions of PCH projected calving habitat area (Severson et al. 2021).</p> <p>c. PCH comprehensive post-calving habitat area is inclusive of <u>current</u> PCH post-calving habitat, defined as the area used in the 2019 FEIS (BLM 2019) for post-calving (based on annual 95 percent contours calculated using kernel density estimation of parturient female caribou locations May 26-June 10 during more than 40 percent of the years surveyed), <u>plus</u> the addition of portions of PCH projected post-calving habitat area (Severson et al. 2021).</p> <p><u>Objective:</u> Minimize disturbance and hindrance of caribou to allow for unhindered movement and use by caribou within the 1002 Area, particularly during the sensitive calving, post-calving, and insect relief periods, and maintain caribou access to summer habitats, including calving and post-calving. Avoid disrupting or breaking up caribou aggregations during calving, post-calving, and insect-relief periods.</p> <p><u>Requirement/Standard:</u> (No leasing) No leasing would be allowed in the PCH comprehensive calving habitat area.</p> <p>(CSU) No CPFs would be allowed in the PCH comprehensive post-calving habitat area. Well pads, roads, airstrips, and pipelines would be permitted, in accordance with ROP 23 and ROP 23.1. Infrastructure would be limited across the area to 100 acres per township, not to exceed 510 acres total in this area.</p> <p>(TL) Construction activities using heavy equipment, excluding drilling from existing production pads, would be suspended in the PCH comprehensive post-calving habitat area no later than May 15 through no earlier than July 28, unless approved by the BLM Authorized Officer, in consultation with the appropriate federal (including Arctic Refuge staff, USFWS, and BLM), state, and NSB regulatory and resource agencies.</p> <p>The intent of this requirement is to restrict activities that would disturb caribou during calving, post-calving, and insect-relief periods. If caribou arrive in the Coastal Plain before May 15, or if they remain in the area past July 28 in significant numbers (greater than approximately 10 percent of the estimated calving cow population or 1,000 during insect-relief periods), construction activities using heavy equipment would be suspended. The lessee shall submit with the development proposal a stop work plan that considers this, and any other mitigation related to caribou early arrival or late departure. The intent of this latter requirement is to provide flexibility to adapt to changing climate conditions that may occur during the life of fields in the region.</p> <p>The lessee/operator/contractor would develop an Adaptive Research and Management Plan (ARMP) to identify research needs, carry out monitoring and</p>	<p>a. PCH projected calving and post-calving habitat areas are defined following those identified by Severson et al. (2021) for the projected 2050-2059 ranges.</p> <p>b. PCH comprehensive calving habitat area is inclusive of <u>current</u> PCH calving habitat, defined as the area used in the 2019 FEIS (BLM 2019) for calving (based on annual 95 percent contours calculated using kernel density estimation of parturient female caribou locations May 26-June 10 during more than 40 percent of the years surveyed), <u>plus</u> the addition of portions of PCH projected calving habitat area (Severson et al. 2021).</p> <p>c. PCH comprehensive post-calving habitat area is inclusive of <u>current</u> PCH post-calving habitat, defined as the area used in the 2019 FEIS (BLM 2019) for post-calving (based on annual 95 percent contours calculated using kernel density estimation of parturient female caribou locations May 26-June 10 during more than 40 percent of the years surveyed), <u>plus</u> the addition of portions of PCH projected post-calving habitat area (Severson et al. 2021).</p> <p><u>Objective:</u> Minimize disturbance and hindrance of caribou to allow for unhindered movement and use by caribou within the 1002 Area, particularly during the sensitive calving, post-calving, and insect relief periods, and maintain caribou access to summer habitats, including calving and post-calving. Avoid Disrupting or breaking up caribou aggregations during calving, post-calving, and insect-relief periods. Minimize disturbance to polar bear denning habitat and to bears using nearshore areas.</p> <p><u>Requirement/Standard:</u> (No leasing) No leasing would be allowed in the PCH comprehensive calving habitat area.</p> <p>(CSU) No CPFs would be allowed in the PCH comprehensive post-calving habitat area. Well pads, roads, airstrips, and pipelines would be permitted, in accordance with ROP 23 and ROP 23.1. Infrastructure would be limited across the area to 100 acres per township, not to exceed 510 acres total in this area.</p> <p>(TL) Construction activities using heavy equipment, excluding drilling from existing production pads, would be suspended in the PCH comprehensive post-calving habitat area no later than May 15 through no earlier than July 28, unless approved by the BLM Authorized Officer, in consultation with the appropriate federal (including Arctic Refuge staff, USFWS, and BLM), state, and NSB regulatory and resource agencies.</p> <p>The intent of this requirement is to restrict activities that would disturb caribou during calving, post-calving, and insect-relief periods. If caribou arrive in the Coastal Plain before May 15, or if they remain in the area past July 28 in significant numbers (greater than approximately 10 percent of the estimated calving cow population or 1,000 during insect-relief periods), construction activities using heavy equipment would be suspended. The lessee shall submit with the development proposal a stop work plan that considers this, and any other mitigation related to caribou early arrival or late departure. The intent of this latter requirement is to provide flexibility to adapt to changing climate conditions that may occur during the life of fields in the region.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	<p>research efforts, evaluate existing/ongoing management and mitigation efforts, quantify impacts, and identify management changes when necessary. This plan would be submitted to USFWS (including Arctic Refuge staff), BLM, and the International Porcupine Caribou Herd Technical Committee for review and approval. The lessee would provide adequate funds to implement this monitoring program. BLM and USFWS would hire an organization or agency to carry out this monitoring program.</p> <p>As part of the ARMP, caribou occupancy and movement would be monitored from May 15 through August 20. Also, the permittee or contractor would coordinate with Tribal governments to involve Tribal observers in these observation efforts. The details of how this coordination would occur must be outlined in the ARMP. Based on these observations, traffic would be stopped temporarily to allow crossing by 10 or more caribou. Sections of road would be evacuated whenever a large number of caribou (approximately 100 or more) approach the road within 2 miles (May 15-July 28). The permittee shall submit with the development proposal a vehicle use plan consistent with or exceeding provisions in the ARMP (see ROP 23.1) that considers these and any other mitigation to minimize or prevent caribou/vehicle interactions during the post-calving period.</p> <p>a. The following ground and air traffic restrictions would apply to permanent oil and gas-related roads in the areas and time periods indicated:</p> <p>i. (TL) Within the PCH comprehensive calving and post-calving habitat areas, from May 15 through July 28, traffic speed shall not exceed 15 miles per hour when caribou are within 2.0 mile of the road. Additional strategies may include limiting trips and using convoys and different vehicle types, to the extent practicable. The lessee shall submit with the development proposal for review and approval by BLM Authorized Officer in consultation with the USFWS a vehicle use plan consistent with or exceeding provisions in the ARMP (see ROP 23.1) that considers these and any other mitigation. The plan shall include collection of data on vehicle traffic (counts, times, speed, etc.) and caribou interactions. The BLM Authorized Officer, in coordination with Tribal Governments, the USFWS, and the International PCH Technical Committee would require adjustments if resulting disturbance is determined to be unacceptable.</p> <p>1) Major equipment, materials, and supplies to be used at oil and gas work sites in the PCH projected post-calving habitat area should be stockpiled prior to the period of May 15 through July 28 to minimize road traffic during that period.</p> <p>Operators of aircraft used for permitted activities would maintain an altitude of at least 2,000 feet above ground level over both the PCH comprehensive caribou calving and post-calving habitat areas, unless doing so would endanger human life or violate safe flying practices. See ROP 34 for additional conditions.</p>	<p>The lessee/operator/contractor would develop an Adaptive Research and Management Plan (ARMP) to identify research needs, carry out monitoring and research efforts, evaluate existing/ongoing management and mitigation efforts, quantify impacts, and identify management changes when necessary. This plan would be submitted to USFWS (including Arctic Refuge staff), BLM, and the International Porcupine Caribou Herd Technical Committee for review and approval. The lessee would provide adequate funds to implement this monitoring program. BLM and USFWS would hire an organization or agency to carry out this monitoring program.</p> <p>As part of the ARMP, caribou occupancy and movement would be monitored from May 15 through August 20. Also, the permittee or contractor would coordinate with local Tribal governments to involve Tribal observers in these observation efforts. The details of how this coordination would occur must be outlined in the ARMP. Based on these observations, traffic would be stopped temporarily to allow crossing by 10 or more caribou. Sections of road would be evacuated whenever a large number of caribou (approximately 100 or more) approach the road within 2 miles (May 15-July 28). The permittee shall submit with the development proposal a vehicle use plan consistent with or exceeding provisions in the ARMP (see ROP 23.1) that considers these and any other mitigation to minimize or prevent caribou/vehicle interactions during the post-calving period.</p> <p>a. The following ground and air traffic restrictions would apply to permanent oil and gas-related roads in the areas and time periods indicated:</p> <p>i. (TL) Within the PCH comprehensive calving and post-calving habitat areas, from May 15 through July 28, traffic speed shall not exceed 15 miles per hour when caribou are within 2.0 mile of the road. Additional strategies may include limiting trips and using convoys and different vehicle types, to the extent practicable. The lessee shall submit with the development proposal for review and approval by BLM Authorized Officer in consultation with the USFWS a vehicle use plan consistent with or exceeding provisions in the ARMP (see ROP 23.1) that considers these and any other mitigation. The plan shall include collection of data on vehicle traffic (counts, times, speed, etc.) and caribou interactions. The BLM Authorized Officer, in coordination with local Tribal Governments, the USFWS, and the International PCH Technical Committee would require adjustments if resulting disturbance is determined to be unacceptable.</p> <p>1) Major equipment, materials, and supplies to be used at oil and gas work sites in the PCH projected post-calving habitat area should be stockpiled prior to the period of May 15 through July 28 to minimize road traffic during that period.</p> <p>Operators of aircraft used for permitted activities would maintain an altitude of at least 2,000 feet above ground level over both the PCH comprehensive caribou calving and post-calving habitat areas, unless doing so would endanger human life or violate safe flying practices. See ROP 34 for additional conditions.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Lease Stipulation 7—Porcupine Caribou Primary Calving Habitat Area (Map 2-2)⁶</p> <p><i>Note:</i> PCH primary calving habitat area was defined as the area used for calving (based on annual 95 percent contours calculated using kernel density estimation of parturient female caribou locations May 26-June 10) during more than 40 percent of the years surveyed.</p> <p>Objective: Minimize disturbance and hindrance of caribou or alteration of their movements in the south-southeast portion of the Coastal Plain, which has been identified as important caribou habitat during calving.</p> <p>Requirement/Standard: (TL) Construction activities using heavy equipment, excluding drilling from existing production pads, would be suspended in the PCH primary calving habitat area from May 20 through June 20. These areas encompass approximately 721,200 acres. If caribou arrive in the Coastal Plain before May 20, construction activities using heavy equipment would be suspended. The lessee shall submit with the development proposal a stop work plan that considers this, and any other mitigation related to caribou early arrival. The intent of this latter requirement is to provide flexibility to adapt to changing climate conditions that may occur during the life of fields in the region. The Authorized Officer may waive this stipulation if the operator, through coordination with appropriate federal, state, and local regulatory agencies can demonstrate calving is not occurring in the lease area; or may grant an exception if the operator can demonstrate their action would not hinder caribou or alter their movements.</p> <p>a. The following ground and air traffic restrictions would apply to permanent oil and gas-related roads in the areas and time periods indicated:</p> <p>i. Within the calving habitat area, from May 20 through June 20, traffic speed shall not exceed 15 miles per hour when caribou are within 0.5 mile of the road. Additional strategies may include limiting trips and using convoys and different vehicle types, to the extent practicable. The lessee shall submit with the development proposal a vehicle use plan that considers these and any other mitigation. The plan shall include a vehicle-use monitoring plan. The BLM Authorized Officer would require adjustments if resulting disturbance is determined to be unacceptable.</p> <p>1) Major equipment, materials, and supplies to be used at oil and gas work sites in the calving habitat area should be stockpiled prior to the period of May 20 through June 20 to minimize road traffic during that period.</p> <p>b. Operators of aircraft used for permitted activities would maintain an altitude of at least 2,000 feet above ground level (except for takeoffs and landings) over caribou calving range, unless doing so would endanger human life or violate safe flying practices. See Required Operating Procedure 34 for additional conditions.</p>	<p>Lease Stipulation 7—Porcupine Caribou Primary Calving Habitat Area (Map 2-4)</p> <p><i>Note:</i> Same as Alternative B.</p> <p>Objective: Same as Alternative B.</p> <p>Requirement/Standard:</p> <p>a. (No leasing) Approximately 476,600 acres of the PCH primary calving habitat area would not be offered for lease and would not be available for surface occupancy.</p> <p>b. (NSO) Approximately 244,600 acres may be offered for lease but subject to NSO.</p>	<p>Lease Stipulation 7—Porcupine Caribou Primary Calving Habitat Area</p> <p>See Lease Stipulation 6.</p>	<p>Lease Stipulation 7—Porcupine Caribou Primary Calving Habitat Area</p> <p>See Lease Stipulation 6.</p>

⁶For purposes of the table, PCH is used for Porcupine Caribou Herd

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Lease Stipulation 8—Porcupine Caribou Post-Calving Habitat Area (Map 2-2)</p> <p><u>Note:</u> The PCH post-calving area was defined as the area used by female caribou (based on annual 95 percent contours calculated using kernel density estimation of female caribou locations June 11-30) during more than 40 percent of the years surveyed.</p> <p><u>Objective:</u> To protect key surface resources and subsistence resources/activities from permanent oil and gas development and associated activities in areas used by caribou during post-calving and insect-relief periods.</p> <p><u>Requirement/Standard:</u> See ROP 23.</p>	<p>Lease Stipulation 8—Porcupine Caribou Post-Calving Habitat Area (Map 2-4)</p> <p><u>Note:</u> Same as Alternative B.</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> (CSU) No CPFs would be allowed in the PCH post-calving habitat area. Well pads, roads, airstrips, and pipelines would be permitted, in accordance with ROP 23. Infrastructure would be limited across the area to 100 acres per township, not to exceed 510 acres total in this area.</p> <p>(TL) The permittee or a contractor shall observe caribou movement from May 20 through August 20, or earlier if caribou are present prior to May 20. Based on these observations, traffic would be stopped temporarily to allow crossing by 10 or more caribou. Sections of road would be evacuated whenever an attempted crossing by a large number of caribou (approximately 100 or more) appears to be imminent (June 15–July 20). The permittee shall submit with the development proposal a vehicle-use plan that considers these and any other mitigation to minimize or prevent caribou/vehicle interactions during the post-calving period.</p>	<p>Lease Stipulation 8—Porcupine Caribou Post-Calving Habitat Area</p> <p>See Lease Stipulation 6.</p>	<p>Lease Stipulation 8—Porcupine Caribou Post-Calving Habitat Area</p> <p>See Lease Stipulation 6.</p>
<p>Lease Stipulation 9—Coastal Area</p> <p><u>Objective:</u> Protect nearshore marine waters, lagoons, barrier islands, coastlines, and their value as fish and wildlife habitat, including for waterfowl, shorebirds, and marine mammals; minimize the hindrance or alteration of caribou movement in caribou coastal insect-relief areas; minimize hindrance or alteration of polar bear use and movement in coastal habitats; protect and minimize disturbance from oil and gas activities to nearshore marine habitats for polar bears and seals; prevent loss and alteration of important coastal bird habitat; and prevent impacts on nearshore marine subsistence resources and activities.</p> <p><u>Requirement/Standard:</u> Before beginning exploration or development within 2 miles inland of the coastline, the lessee/operator/contractor would develop and implement an impact and conflict avoidance and monitoring plan to assess, minimize, and mitigate the effects of the infrastructure and its use on these coastal habitats and their use by wildlife and people. Operators would be responsible for developing comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and spill prevention, control, and countermeasure plans and maintain adequate oil spill response capability to effectively respond during periods of broken ice or open water, based on the statutes, regulations, and guidelines of the EPA, ADEC, and the BSEE, as well as ROPs, stipulations, and policy guidelines of the BLM.</p>	<p>Lease Stipulation 9—Coastal Area (Map 2-4)</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> (NSO) Exploratory well drill pads, production well drill pads, or CPFs for oil or gas would not be permitted within 2 miles inland of the coastline. In a case in which the BLM authorizes permanent oil and gas infrastructure in the nearshore marine area, the lessee/operator/ contractor would develop and implement an impact and conflict avoidance and monitoring plan. This would be used to assess, minimize, and mitigate the effects of the infrastructure and its use on these coastal area habitats and their use by wildlife and people, including the following:</p> <ol style="list-style-type: none"> Design and construct facilities to minimize impacts on subsistence uses, travel corridors, and seasonally concentrated fish and wildlife resources. Daily operations, including use of support vehicles, watercraft, and aircraft, alone or in combination with other past, present, and reasonably foreseeable activities, would be conducted to minimize impacts on subsistence and other public uses, travel corridors, and seasonally concentrated fish and wildlife resources. The location of oil and gas facilities, including artificial islands, platforms, associated pipelines, ice or other roads, bridges or causeways, would be sited and constructed to not pose a hazard to public navigation, using traditional high-use subsistence-related travel routes into and through the major coastal lagoons and bays, as identified by the community of Kaktovik and the NSB. 	<p>Lease Stipulation 9—Coastal Area (Map 2-6)</p> <p><u>Objective:</u> Protect nearshore marine waters, lagoons, barrier islands, coastlines, and their value as fish and wildlife habitat, including for waterfowl, loons, shorebirds, and marine mammals; minimize the hindrance or alteration of caribou movement in caribou coastal insect-relief areas; minimize hindrance or alteration of polar bear use and movement in coastal habitats; protect and minimize disturbance from oil and gas activities to nearshore marine habitats for polar bears and seals; prevent loss and alteration of important coastal bird habitat; prevent impacts on nearshore marine subsistence resources and activities; and minimize impacts on historic travel routes and cultural resources in coastal areas.</p> <p><u>Requirement/Standard:</u> (NSO) Before beginning exploration or development within 2 miles inland of the coastline, the lessee/operator/contractor, with local traditional knowledge holders, would develop and implement an impact and conflict avoidance and monitoring plan to assess, minimize, and mitigate the effects of the infrastructure and its use on these coastal habitats and their use by wildlife and people. The impact and conflict avoidance and monitoring plan would utilize a monitoring and adaptive management approach. Operators would be responsible for developing comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and spill prevention, control, and countermeasure plans and maintain adequate oil spill response capability to effectively respond during periods of broken ice or open water, based on the statutes, regulations, and guidelines of the EPA, ADEC, and the BSEE, as well as ROPs, stipulations, and policy guidelines of the BLM.</p>	<p>Lease Stipulation 9—Coastal Area (Map 2-8)</p> <p><u>Objective:</u> Protect nearshore marine waters, lagoons, barrier islands, coastlines, and their value as fish and wildlife habitat, including for waterfowl, loons, shorebirds, and marine mammals; minimize the hindrance or alteration of caribou movement in caribou coastal insect-relief areas; minimize hindrance or alteration of polar bear use and movement in coastal habitats; protect and minimize disturbance from oil and gas activities to nearshore marine habitats for polar bears and seals; prevent loss and alteration of important coastal bird habitat; prevent impacts on nearshore marine subsistence resources and activities; and minimize impacts on historic travel routes and cultural resources in coastal areas.</p> <p><u>Requirement/Standard:</u> (NSO) From the coastline to 2 miles inland, no permanent oil and gas infrastructure would be permitted.</p> <p><u>Exceptions:</u> All exception requests will be coordinated between the BLM Authorized Officer and the USFWS as surface manager.</p> <p>In NSO areas a one-time exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to accessing subsurface resources; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws.</p> <p>(TL) Oil and gas activities such as drilling, seismic exploration, and testing, are not allowed on the major nearshore marine waters, lagoons, barrier islands, and coastal islands between May 15 and November 1 or when sea ice edge (as defined by Fetterer et al. 2017) is 10 miles distant or greater from the coast each season, whichever is later.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	d. Operators would be responsible for developing comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and spill prevention, control, and countermeasure plans and maintain adequate oil spill response capability to effectively respond during periods of broken ice or open water, based on the statutes, regulations, and guidelines of the EPA, ADEC, and the BSEE, as well as ROPs, stipulations, and policy guidelines of the BLM.	(see above)	<p>Before beginning exploration or development within 2 miles inland of the coastline, the lessee/operator/contractor, with local traditional knowledge experts, would develop and implement an impact and conflict avoidance and monitoring plan to assess, minimize, and mitigate the effects of the infrastructure and its use on these coastal habitats and their use by fish, wildlife and people.</p> <p>The impact and conflict avoidance and monitoring plan would utilize a monitoring and adaptive management approach. Operators would be responsible for developing comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and spill prevention, control, and countermeasure plans and maintain adequate oil spill response capability to effectively respond during periods of broken ice or open water, based on the statutes, regulations, and guidelines of the EPA, ADEC, and the BSEE, as well as ROPs, stipulations, and policy guidelines of the BLM.</p>
<p>Lease Stipulation 10—Wilderness Boundary</p> <p>No similar objective or requirement/standard.</p>	<p>Lease Stipulation 10—Wilderness Boundary (Map 2-4)</p> <p><u>Objective:</u> Protect wilderness values in the Mollie Beattie Wilderness Area.</p> <p><u>Requirement/Standard:</u> (NSO) Surface occupancy, including exploratory and production well drill pads, structures and facilities, and gravel and ice roads, would not be allowed within 3 miles of the southern and eastern boundaries of the Coastal Plain where they are near designated wilderness.</p> <p>To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary.</p>	<p>Lease Stipulation 10—Wilderness Boundary (Map 2-6)</p> <p><u>Objective:</u> Same as Alternative C.</p> <p><u>Requirement/Standard:</u></p> <p>a. (No leasing) Areas within 3 miles of the Mollie Beattie Wilderness Area would not be offered for lease and would not be available for surface occupancy.</p> <p>b. (NSO) Same as Alternative C, where not otherwise closed to leasing.</p> <p>To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary.</p>	<p>Lease Stipulation 10—Wilderness Boundary (Map 2-8)</p> <p><u>Objective:</u> Same as Alternative C.</p> <p><u>Requirement/Standard:</u></p> <p>a. (No leasing) Areas within 3 miles of the Mollie Beattie Wilderness Area would not be offered for lease and would not be available for surface occupancy.</p> <p>b. (NSO) Same as Alternative C, where not otherwise closed to leasing.</p> <p><u>Exceptions:</u> All exception requests will be coordinated between the BLM Authorized Officer and the USFWS as surface manager.</p> <p>In NSO areas a one-time exception may be granted by the Authorized Officer if the operator can demonstrate: (1) there are no practical alternatives to accessing subsurface resources; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws.</p> <p>To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary.</p>
<p>Lease Stipulation 11—Native Allotments</p> <p><u>Objective:</u> Ensure Native allotment owners maintain control over use of their land.</p> <p><u>Requirement/Standard:</u> Use of the surface of Native allotments for the construction and maintenance of improvements is prohibited unless written consent is obtained from the allotment owner.</p>	<p>Lease Stipulation 11—Native Allotments</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Same as Alternative B.</p>	<p>Lease Stipulation 11—Native Allotments</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Use of the surface of Native allotments for the construction and maintenance of improvements is prohibited unless written consent to transverse the allotment is obtained from the allotment owner.</p>	<p>Lease Stipulation 11—Native Allotments</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Use of the surface of Native allotments for the construction and maintenance of improvements is prohibited unless written consent to transverse the allotment is obtained from the allotment owner.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Lease Stipulation 12—Ice-rich Soils and Yedoma Deposits</p> <p>No similar lease stipulation.</p>	<p>Lease Stipulation 12—Ice-rich Soils and Yedoma Deposits</p> <p>No similar lease stipulation.</p>	<p>Lease Stipulation 12—Ice-rich Soils and Yedoma Deposits (Map 2-6)</p> <p><u>Objective:</u> Prevent additional heat input to ice-rich soils and yedoma deposits which are thawing and melting due to climate change generating unstable landforms (i.e., thermokarst) and surface disturbances such as subsidence and hydrologic changes.</p> <p><u>Requirement/Standard:</u> (NSO) Prohibit permanent oil and gas facilities, wells, pipelines, and gravel roads and pads from areas of thawed unstable ice-rich soils and yedoma deposits or design and construct pipelines and roads to accommodate the thaw subsidence anticipated over the design life.</p>	<p>Lease Stipulation 12—Ice-rich Soils and Yedoma Deposits (Map 2-8)</p> <p><u>Objective:</u> Prevent additional heat input to all ice-rich soils and yedoma deposits which are thawing and melting due to climate change generating unstable landforms (i.e., thermokarst) and surface disturbances such as subsidence and hydrologic changes. Minimize disturbance to polar bear denning habitat.</p> <p><u>Requirement/Standard:</u> Design and construct all infrastructure, including oil and gas facilities, wells, pipelines, and gravel roads and pads, to accommodate the thaw subsidence anticipated over the design life in areas of ice-rich soils and yedoma deposits.</p>
<p>Lease Stipulation 13—Master Development Plan</p> <p>No similar lease stipulation.</p>	<p>Lease Stipulation 13—Master Development Plan</p> <p>No similar lease stipulation.</p>	<p>Lease Stipulation 13—Master Development Plan</p> <p><u>Objective:</u> Minimize the areal extent of development and redundant infrastructure by a single operator and among multiple operators.</p> <p><u>Requirement/Standard:</u> BLM/USFWS Authorized Officers must approve a Master Development Plan for each field development. Master Plans shall address:</p> <ol style="list-style-type: none"> a. Compact design – Operators shall design all surface infrastructure with the smallest possible footprint. Development and production infrastructure must avoid creating ponds and other minimally-utilized areas bounded by gravel including gravel roads. b. Joint use of surface infrastructure – Operators shall develop comprehensive facility sharing agreements to maximize co-use of: <ol style="list-style-type: none"> i. construction infrastructure including barge landing docks, gravel pads for material storage, gravel mines, construction water sources, and construction service centers. ii. all permanent surface facilities including gravel roads, gravel drill sites, central production facility (CPF) pads, processing facilities, gravel airstrips, pipelines, power generating facilities and transmission lines, sea water treatment plants, base camps, and oil field service centers. <p>Standardized facility sharing agreements for future use by others shall be required as a condition of development. Subsequent development shall utilize these agreements to minimize the overall development footprint. Where two or more parties are developing on the same timeline, joint construction and co-use of surface facilities shall be required as a design basis for each party to minimize the overall development footprint.</p>	<p>Lease Stipulation 13—Master Development Plan</p> <p><u>Objective:</u> Minimize the areal extent of development and redundant infrastructure by a single operator and among multiple operators.</p> <p><u>Requirement/Standard:</u> BLM Authorized Officer, in coordination with the USFWS as the surface manager, must approve a Master Development Plan for each field development. Master Plans shall address:</p> <ol style="list-style-type: none"> a. Compact design – Operators shall design all surface infrastructure with the smallest possible footprint. Development and production infrastructure must avoid creating ponds and other minimally-utilized areas bounded by gravel including gravel roads. b. Joint use of surface infrastructure – Operators shall develop comprehensive facility sharing agreements to maximize co-use of: <ol style="list-style-type: none"> i. construction infrastructure including barge landing docks, gravel pads for material storage, gravel mines, construction water sources, and construction service centers. ii. all permanent surface facilities including gravel roads, gravel drill sites, central production facility (CPF) pads, processing facilities, gravel airstrips, pipelines, power generating facilities and transmission lines, sea water treatment plants, base camps, and oil field service centers. <p>Standardized facility sharing agreements for future use by others shall be required as a condition of development. Subsequent development shall utilize these agreements to minimize the overall development footprint. Where two or more parties are developing on the same timeline, joint construction and co-use of surface facilities shall be required as a design basis for each party to minimize the overall development footprint.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Lease Stipulation 14 – Polar Bear Den Detection, Avoidance, Monitoring, and Reporting</p> <p>No similar lease stipulation.</p>	<p>Lease Stipulation 14 – Polar Bear Den Detection, Avoidance, Monitoring, and Reporting</p> <p>No similar lease stipulation.</p>	<p>Lease Stipulation 14 – Polar Bear Den Detection, Avoidance, Monitoring, and Reporting</p> <p>Objective: Minimize disturbance to denning polar bears.</p> <p>Requirement/Standard:</p> <p>a. In order to limit disturbance around known polar bear dens:</p> <ul style="list-style-type: none"> i. <i>Attempt to locate polar bear dens.</i> Lessees/operators/contractors seeking to carry out onshore activities during the denning season must conduct two separate surveys for occupied polar bear dens in all denning habitat within 1.6 km (1 mi) of proposed activities using aerial infrared (AIR) imagery. The first survey must occur between the dates of November 25 and December 15, and the second between the dates of December 5 and December 31. AIR surveys will be conducted during darkness or civil twilight and not during daylight hours. Ideal environmental conditions during surveys would be clear, calm, and cold. If there is blowing snow, and form of precipitation, or other sources of airborne moisture, use of AIR detection is not advised. Flight crews will record and report environmental parameters including air temperature, dew point, wind speed and direction, cloud ceiling, and percent humidity, and a flight log will be provided to BLM and USFWS within 48 hours of the flight. A scientist with experience in the in-air interpretation of AIR imagery will be on board to analyze the AIR data in real time. The data (infrared video) will be made available for viewing by BLM and USFWS immediately upon return of the survey aircraft to the base of operations. All observed or suspected polar bear dens must be reported to BLM and USFWS prior to the initiation of activities. ii. <i>Observe the exclusion zone around known polar bear dens.</i> Lessees/operators/contractors must observe a 1.6-km (1-mi) operational exclusion zone around all known polar bear dens during the denning season (approximately November–April, or until the female and cubs leave the areas). Should previously unknown occupied dens be discovered within 1 mi of activities, work must cease and the BLM and USFWS contacted for guidance. The BLM and USFWS would evaluate these instances on a case-by-case basis to recommend the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified. iii. <i>Use the den habitat map developed by the US Geological Survey (USGS).</i> This product will help locate potential polar bear dens when conducting activities in the coastal areas of the Beaufort Sea. This measure helps identify the location of potential polar bear dens and ensures they are considered when conducting activities in the coastal areas of the Beaufort Sea. iv. <i>Polar bear den restrictions.</i> Restrict the timing of the activity to range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified. 	<p>Lease Stipulation 14 – Polar Bear Den Detection, Avoidance, Monitoring, and Reporting</p> <p>Objective: Minimize disturbance to denning polar bears.</p> <p>Requirement/Standard:</p> <p>a. In order to limit disturbance around known polar bear dens:</p> <ul style="list-style-type: none"> i. <i>Attempt to locate polar bear dens.</i> Lessees/operators/contractors seeking to carry out onshore activities during the denning season must conduct two separate surveys for occupied polar bear dens in all denning habitat within 1.6 km (1 mi) of proposed activities using aerial infrared (AIR) imagery. The first survey must occur between the dates of November 25 and December 15, and the second between the dates of December 5 and December 31. AIR surveys will be conducted during darkness or civil twilight and not during daylight hours. Ideal environmental conditions during surveys would be clear, calm, and cold. If there is blowing snow, and form of precipitation, or other sources of airborne moisture, use of AIR detection is not advised. Flight crews will record and report environmental parameters including air temperature, dew point, wind speed and direction, cloud ceiling, and percent humidity, and a flight log will be provided to BLM and USFWS within 48 hours of the flight. A scientist with experience in the in-air interpretation of AIR imagery will be on board to analyze the AIR data in real time. The data (infrared video) will be made available for viewing by BLM and USFWS immediately upon return of the survey aircraft to the base of operations. All observed or suspected polar bear dens must be reported to BLM and USFWS prior to the initiation of activities. ii. <i>Observe the exclusion zone around known polar bear dens.</i> Lessees/operators/contractors must observe a 1.6-km (1-mi) operational exclusion zone around all known polar bear dens during the denning season (approximately November–April, or until the female and cubs leave the areas). Should previously unknown occupied dens be discovered within 1 mi of activities, work must cease and the BLM and USFWS contacted for guidance. The BLM and USFWS would evaluate these instances on a case-by-case basis to recommend the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified. iii. <i>Use the den habitat map developed by the US Geological Survey (USGS).</i> This product will help locate potential polar bear dens when conducting activities in the coastal areas of the Beaufort Sea. This measure helps identify the location of potential polar bear dens and ensures they are considered when conducting activities in the coastal areas of the Beaufort Sea. iv. <i>Polar bear den restrictions.</i> Restrict the timing of the activity to range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified.

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	<p>b. In order to limit disturbance around known polar bear dens:</p> <p><i>Monitoring requirements</i></p> <ul style="list-style-type: none"> i. Develop and implement a site-specific, BLM and USFWS-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on polar bears, and the subsistence use of this species. ii. Provide trained, qualified, and BLM and USFWS-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iii. For offshore activities, provide trained, qualified, and BLM and USFWS-approved observers on board all operational and support vessels to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iv. Cooperate with the BLM and USFWS and other designated Federal, State, and local agencies to monitor the impacts of Industry activities on polar bears. Where information is insufficient to evaluate the potential effects of activities on polar bears, and the subsistence use of this species, operators may be required to participate in joint monitoring and/or research efforts to address these information needs and ensure the least practicable impact to these resources. <p><i>Reporting requirements</i></p> <p>Lessees/operators/contractors must report the results of monitoring and mitigation activities to the BLM and USFWS.</p> <p>a. In-season monitoring reports</p> <ul style="list-style-type: none"> i. Activity progress reports. Notify the BLM and USFWS at least 48 hours prior to the onset of activities; provide the BLM and USFWS weekly progress reports of any significant changes in activities and/or locations; and notify the BLM and USFWS within 48 hours after ending of activities. ii. Polar bear observation reports. Report all observations of polar bears and potential polar bear dens, during any Industry activity. Information in the observation report must include, but is not limited to: (1) Date, time, and location of observation; (2) Number of bears; (3) Sex and age; (4) Observer name and contact information; (5) Weather, visibility, sea state, and sea-ice conditions at the time of observation; (6) Estimated closest distance of bears from personnel and facilities; (7) Industry activity at time of sighting; (8) Possible attractants present; (9) Bear behavior; (10) Description of the encounter; (11) Duration of the encounter; and (12) Mitigation actions taken. <p>b. Notification of LOA incident report. Report all bear incidents during any Industry activity. Reports must include: (1) All information specified for an observation report; (2) A complete detailed description of the incident; and (3) Any other actions taken.</p>	<p>b. In order to limit disturbance around known polar bear dens:</p> <p><i>Monitoring requirements</i></p> <ul style="list-style-type: none"> i. Develop and implement a site-specific, BLM and USFWS-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on polar bears, and the subsistence use of this species. ii. Provide trained, qualified, and BLM and USFWS-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iii. For offshore activities, provide trained, qualified, and BLM and USFWS-approved observers on board all operational and support vessels to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iv. Cooperate with the BLM and USFWS and other designated Federal, State, and local agencies to monitor the impacts of Industry activities on polar bears. Where information is insufficient to evaluate the potential effects of activities on polar bears, and the subsistence use of this species, operators may be required to participate in joint monitoring and/or research efforts to address these information needs and ensure the least practicable impact to these resources. <p><i>Reporting requirements</i></p> <p>Lessees/operators/contractors must report the results of monitoring and mitigation activities to the BLM and USFWS.</p> <p>a. In-season monitoring reports</p> <ul style="list-style-type: none"> i. Activity progress reports. Notify the BLM and USFWS at least 48 hours prior to the onset of activities; provide the BLM and USFWS weekly progress reports of any significant changes in activities and/or locations; and notify the BLM and USFWS within 48 hours after ending of activities. ii. Polar bear observation reports. Report all observations of polar bears and potential polar bear dens, during any Industry activity. Information in the observation report must include, but is not limited to: (1) Date, time, and location of observation; (2) Number of bears; (3) Sex and age; (4) Observer name and contact information; (5) Weather, visibility, sea state, and sea-ice conditions at the time of observation; (6) Estimated closest distance of bears from personnel and facilities; (7) Industry activity at time of sighting; (8) Possible attractants present; (9) Bear behavior; (10) Description of the encounter; (11) Duration of the encounter; and (12) Mitigation actions taken. <p>b. Notification of LOA incident report. Report all bear incidents during any Industry activity. Reports must include: (1) All information specified for an observation report; (2) A complete detailed description of the incident; and (3) Any other actions taken.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	c. Final report. The results of monitoring and mitigation efforts identified in the marine mammal monitoring and mitigation plan must be submitted to the BLM and USFWS for review within 90 days of the expiration of an authorization. Information in the final report must include: (1) Copies of all observation reports submitted under an authorization; (2) A summary of the observation reports; (3) A summary of monitoring and mitigation efforts, including areas, total hours, total distances, and distribution; (4) Analysis of factors affecting the visibility and detectability of polar bears during monitoring; (5) Analysis of the effectiveness of mitigation measures; (6) Analysis of the distribution, abundance, and behavior of polar bears observed; and (7) Estimates of take in relation to the specified activities	c. Final report. The results of monitoring and mitigation efforts identified in the marine mammal monitoring and mitigation plan must be submitted to the BLM and USFWS for review within 90 days of project completion or, for multi-year activities, within 90 days of the end of each annual reporting period. Information in the final report must include: (1) Copies of all observation reports submitted under an authorization; (2) A summary of the observation reports; (3) A summary of monitoring and mitigation efforts, including areas, total hours, total distances, and distribution; (4) Analysis of factors affecting the visibility and detectability of polar bears during monitoring; (5) Analysis of the effectiveness of mitigation measures; (6) Analysis of the distribution, abundance, and behavior of polar bears observed; and (7) Estimates of “take” as defined by the MMPA and its implementing regulations.

Alternative B	Alternative C	Alternative D	Alternative D2
REQUIRED OPERATING PROCEDURES			
WASTE PREVENTION, HANDLING, DISPOSAL, SPILLS, AND PUBLIC SAFETY			
<p>Required Operating Procedure 1</p> <p><u>Objective:</u> Protect public health, safety, and the environment by disposing of solid waste and garbage, in accordance with applicable federal, State, and local laws and regulations.</p> <p><u>Requirement/Standard:</u> Areas of operation would be left clean of all debris.</p>	<p>Required Operating Procedure 1</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 1</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Areas of operation would be left clean of all debris. All solid waste and industry-derived trash originating from permitted activities are required to be properly containerized while on-site or removed from the area of operation and activity.</p>	<p>Required Operating Procedure 1</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Areas of operation would be left clean of all debris. All solid waste and industry-derived trash originating from permitted activities are required to be properly containerized while on-site or removed from the area of operation and activity.</p>
<p>Required Operating Procedure 2</p> <p><u>Objective:</u> Minimize impacts on the environment from nonhazardous and hazardous waste generation. Encourage continuous environmental improvement. Protect the health and safety of oil and gas field workers, local communities, Coastal Plain subsistence users, Coastal Plain recreationists, and the general public. Avoid human-caused changes in predator populations. Minimize attracting predators, particularly bears, to human use areas.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor would prepare and implement a comprehensive waste management plan for all phases of exploration, development, and production, including seismic activities. The plan would include methods and procedures to use bear resistant containers for all waste materials and classes. The plan would be submitted to the BLM Authorized Officer for approval, in consultation with federal, State, and NSB regulatory and resource agencies, as appropriate (based on agency legal authority and jurisdictional responsibility), as part of a plan of operations or other similar permit application.</p> <p>Management decisions affecting waste generation would be addressed in the following order of priority: (1) prevention and reduction, (2) recycling, (3) treatment, and (4) disposal. The plan would consider the following requirements:</p> <p>a. <u>Methods to avoid attracting wildlife to food and garbage:</u> The plan would identify precautions that are to be taken to avoid attracting wildlife to food and garbage. The use of bear-resistant containers for all waste would be required.</p>	<p>Required Operating Procedure 2</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 2</p> <p><u>Objective:</u> Minimize impacts on the environment from nonhazardous and hazardous waste generation. Encourage procedures, processes and a cultural environment which foster continuous improvement of environmental stewardship. Protect the health and safety of oil and gas field workers, local communities, Coastal Plain subsistence users, Coastal Plain recreationists, and the general public. Avoid human caused changes in predator populations. Minimize attracting predators, particularly bears, to human use areas.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor would prepare and implement a comprehensive waste management plan for all phases of exploration, development, and production, including seismic activities. The plan would include methods and procedures to use bear resistant containers for all waste materials and classes. The plan would be submitted to the BLM Authorized Officer for approval, in consultation with federal, State, and NSB regulatory and resource agencies, as appropriate (based on agency legal authority and jurisdictional responsibility), as part of a plan of operations or other similar permit application.</p> <p>Management decisions affecting waste generation would be addressed in the following order of priority: (1) prevention and reduction, (2) recycling, (3) treatment, and (4) disposal. The plan would consider and take into account the following requirements:</p> <p>a. <u>Methods to avoid attracting wildlife to food and garbage:</u> The plan would identify precautions that are to be taken to avoid attracting wildlife to food and garbage. The use of bear-resistant containers for all waste would be required.</p>	<p>Required Operating Procedure 2</p> <p><u>Objective:</u> Minimize impacts on the environment from nonhazardous and hazardous waste generation. Encourage procedures, processes and a cultural environment which foster continuous improvement of environmental stewardship. Protect the health and safety of oil and gas field workers, local communities, Coastal Plain subsistence users, Coastal Plain recreationists, and the general public. Avoid human-caused changes in predator populations. Minimize attracting predators, particularly bears, to human use areas.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor would prepare and implement a comprehensive waste management plan for all phases of exploration, development, and production, including seismic activities. The plan would include methods and procedures to use bear resistant containers for all waste materials and classes. The plan would be submitted to the BLM Authorized Officer for approval, in consultation with the USFWS, and other federal, State, and NSB regulatory and resource agencies, as appropriate (based on agency legal authority and jurisdictional responsibility), as part of a plan of operations or other similar permit application.</p> <p>Management decisions affecting waste generation would be addressed in the following order of priority: (1) prevention and reduction, (2) recycling, (3) treatment, and (4) disposal. The plan would consider and take into account the following requirements:</p> <p>a. <u>Methods to avoid attracting wildlife to food and garbage:</u> The plan would identify precautions that are to be taken to avoid attracting wildlife to food and garbage. The use of bear-resistant containers for all waste would be required.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>b. <u>Disposal of putrescible waste</u>: Requirements prohibit burying garbage. Lessees/operators/contractors would have a written procedure to ensure that rotting waste would be handled and disposed of in a manner that prevents the attraction of wildlife. All rotting waste would be incinerated, backhauled, or composted in a manner approved by the BLM Authorized Officer. All solid waste, including incinerator ash, would be disposed of in an approved waste-disposal facility, in accordance with EPA and ADEC regulations and procedures. Burying human waste is prohibited, except as authorized by the BLM Authorized Officer. The use of bear-resistant containers for all waste would be required.</p> <p>c. <u>Disposal of pumpable waste products</u>: Except as specifically provided, the BLM requires that all pumpable solid, liquid, and sludge waste be disposed of by injection, in accordance with the applicable regulations and procedures. On-pad temporary muds and cuttings storage, as approved by the ADEC, would be allowed as necessary to facilitate annular injection and backhaul operations.</p> <p>d. <u>Disposal of wastewater and domestic wastewater</u>: The BLM prohibits wastewater discharges or disposal of domestic wastewater into bodies of fresh, estuarine, and marine water, including wetlands, unless authorized by an Alaska Pollutant Discharge Elimination System (APDES) or State permit.</p> <p><u>Prevention of the release of poly- and perfluoroalkyl substances</u>: At facilities where fire-fighting foam is required, use fluorine-free foam unless other state or federal regulations require aqueous film-forming foam (AFFF) use. If AFFF use is required, contain, collect, treat, and properly dispose of all runoff, wastewater from training events, and, to the greatest extent possible, from any emergency response events. All discharges must be reported to the ADEC Spill Response Division, Contaminated Sites Program. Measures should also be taken to fully inform workers/trainees of the potential health risks of fluorinated foams and to specify appropriate personal protective equipment to limit exposure during training and use. Training events shall be conducted in lined areas or basins to prevent the release of poly- and perfluoroalkyl substances associated with AFFF.</p>	<p>(see above)</p>	<p>b. <u>Disposal of putrescible waste</u>: Requirements prohibit burying garbage. Lessees/operators/contractors would have a written procedure to ensure that rotting waste would be handled and disposed of in a manner that prevents the attraction of wildlife. All rotting waste would be incinerated, backhauled, or composted in a manner approved by the BLM Authorized Officer. All solid waste, including incinerator ash, would be disposed of in an approved waste-disposal facility, in accordance with EPA and ADEC regulations and procedures.</p> <p>c. <u>Disposal of human waste</u>: Burying human waste is prohibited, except as authorized by the BLM Authorized Officer. The use of human waste receptacles should be used when possible and remain bear resistant to minimize attraction.</p> <p>d. <u>Disposal of pumpable waste products</u>: Except as specifically provided, the BLM requires that all pumpable solid, liquid, and sludge waste be disposed of by injection, in accordance with the applicable regulations and procedures. On-pad temporary muds and cuttings storage, as approved by the ADEC, would be allowed as necessary to facilitate annular injection and backhaul operations.</p> <p>e. <u>Disposal of wastewater and domestic wastewater</u>: The BLM prohibits wastewater discharges or disposal of domestic wastewater into bodies of fresh, estuarine, and marine water, including wetlands, unless authorized by an Alaska Pollutant Discharge Elimination System (APDES) or State permit. See Lease Stipulation 3 for additional requirement/standard.</p> <p><u>Prevention of the release of poly- and perfluoroalkyl substances</u>: At facilities where fire-fighting foam is required, use fluorine-free foam unless other state or federal regulations require AFFF use. If AFFF use is required, contain, collect, treat, and properly dispose of all runoff, wastewater from training events, and, to the greatest extent possible, from any emergency response events. All discharges must be reported to the ADEC Spill Response Division, Contaminated Sites Program. Measures should also be taken to fully inform workers/trainees of the potential health risks of fluorinated foams and to specify appropriate personal protective equipment to limit exposure during training and use. Training events shall be conducted in lined areas or basins to prevent the release of poly- and perfluoroalkyl substances associated with AFFF. fresh, estuarine, and marine water, including wetlands, unless authorized by an Alaska Pollutant Discharge Elimination System (APDES) or State permit. See Lease Stipulation 3 for additional requirement/standard.</p>	<p>d. <u>Disposal of putrescible waste</u>: Requirements prohibit burying garbage. Lessees/operators/contractors would have a written procedure to ensure that rotting waste would be handled and disposed of in a manner that prevents the attraction of wildlife. All rotting waste would be incinerated, backhauled, or composted in a manner approved by the BLM Authorized Officer. All solid waste, including incinerator ash, would be disposed of in an approved waste-disposal facility, in accordance with EPA and ADEC regulations and procedures.</p> <p>e. <u>Disposal of human waste</u>: Burying human waste is prohibited, except as authorized by the BLM Authorized Officer. The use of human waste receptacles should be used when possible and remain bear resistant to minimize attraction.</p> <p>f. <u>Disposal of pumpable waste products</u>: Except as specifically provided, the BLM requires that all pumpable solid, liquid, and sludge waste be disposed of by injection, in accordance with the applicable regulations and procedures. On-pad temporary muds and cuttings storage, as approved by the ADEC, would be allowed as necessary to facilitate annular injection and backhaul operations.</p> <p>g. <u>Disposal of wastewater and domestic wastewater</u>: The BLM prohibits wastewater discharges or disposal of domestic wastewater into bodies of fresh, estuarine, and marine water, including wetlands, unless authorized by an Alaska Pollutant Discharge Elimination System (APDES) or State permit. See Lease Stipulation 3 for additional requirement/standard.</p> <p><u>Prevention of the release of poly- and perfluoroalkyl substances</u>: At facilities where fire-fighting foam is required, use fluorine-free foam unless other state or federal regulations require AFFF use. If AFFF use is required, contain, collect, treat, and properly dispose of all runoff, wastewater from training events, and, to the greatest extent possible, from any emergency response events. All discharges must be reported to the ADEC Spill Response Division, Contaminated Sites Program. Measures should also be taken to fully inform workers/trainees of the potential health risks of fluorinated foams and to specify appropriate personal protective equipment to limit exposure during training and use. Training events shall be conducted in lined areas or basins to prevent the release of poly- and perfluoroalkyl substances associated with AFFF.</p> <p>All plans for waste prevention, handling, disposal, spills, and public safety will comply with the Arctic National Wildlife Refuge's CCP.</p>
<p>Required Operating Procedure 3</p> <p><u>Objective</u>: Minimize the impact of contaminants from refueling operations on fish, wildlife, and the environment.</p> <p><u>Requirement/Standard</u>: Refueling equipment within 100 feet of the active floodplain of any waterbody is prohibited. Fuel storage stations would be located at least 100 feet from any waterbody, except for small caches (up to 210 gallons) for motorboats, float planes, and ski planes, and for small equipment, such as portable generators and water pumps. The BLM Authorized Officer may allow storage and operations at areas closer than the stated distances if properly designed and maintained to account for local hydrologic conditions.</p>	<p>Required Operating Procedure 3</p> <p><u>Objective</u>: Same as Alternatives B.</p> <p><u>Requirement/Standard</u>: Refueling equipment within 500 feet of the active floodplain of any waterbody is prohibited. Fuel storage stations would be at least 500 feet from any waterbody, except for small caches (up to 210 gallons) for motorboats, float planes, ski planes, and small equipment, such as portable generators and water pumps. The BLM Authorized Officer may allow storage and operations at areas closer than the stated distances if properly designed and maintained to account for local hydrologic conditions.</p>	<p>Required Operating Procedure 3</p> <p><u>Objective</u>: Same as Alternative B.</p> <p><u>Requirement/Standard</u>: Permanent fuel storage stations within the setback distances identified in Lease Stipulation 1 is prohibited. Refueling equipment within 500 feet of the active floodplain of any waterbody is prohibited. Temporary or seasonal fuel storage stations would be at least 500 feet from any waterbody, except for small caches (up to 210 gallons) for motorboats, float planes, ski planes, and small equipment, such as portable generators and water pumps. The BLM Authorized Officer may allow storage and operations at areas closer than the stated distances if properly designed and maintained to account for local hydrologic conditions.</p>	<p>Required Operating Procedure 3</p> <p><u>Objective</u>: Same as Alternative B.</p> <p><u>Requirement/Standard</u>: Permanent fuel storage stations within the setback distances identified in Lease Stipulation 1 is prohibited. Refueling equipment within 500 feet of the active floodplain of any waterbody is prohibited. Temporary or seasonal fuel storage stations would be at least 500 feet from any waterbody, except for small caches (up to 210 gallons) for motorboats, float planes, ski planes, and small equipment, such as portable generators and water pumps. The BLM Authorized Officer, in coordination with the USFWS, may allow storage and operations at areas closer than the stated distances if properly designed and maintained to account for local hydrologic conditions.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 4</p> <p><u>Objective:</u> Minimize conflicts from the interaction between humans and bears during oil and gas activities.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Implement policies and procedures to conduct activities in a manner that minimizes adverse impacts on polar bears, their habitat, and their availability for subsistence uses. b. Implement adaptive management practices, such as temporal or spatial activity restrictions, in response to the presence of polar bears or polar bears engaged in a biologically significant activity, must be used to avoid interactions with and minimize impacts to them and their availability for subsistence uses. c. Cooperate with the BLM and USFWS and other designated federal, state, and local agencies to monitor and mitigate the impacts of Industry activities on polar bears. d. Designate trained and qualified personnel to monitor for the presence of polar bears, initiate mitigation measures, and monitor, record, and report the effects of Industry activities on polar bears. e. Provide polar bear awareness training to personnel. f. Contact affected subsistence communities and hunter organizations to discuss potential conflicts. g. <u>Polar bears:</u> The lessee/operator/contractor, as a part of lease operation planning, would prepare and implement polar bear-interaction plans to minimize conflicts between polar bears and humans. These polar bear interaction plans would be developed in consultation with and approved by the BLM and USFWS. The plans would include specific measures identified by the BLM and USFWS for petroleum activities on the Coastal Plain, which may include updated measures and/or may include similar measures identified in the current USFWS Incidental Take Regulations (81 CFR 52318; § 18.128) that have been promulgated and applied to petroleum activities to the west of the Coastal Plain. If the USFWS issues Incidental Take Regulations for petroleum activities in the Coastal Plain, those would be followed instead. These plans must include: <ul style="list-style-type: none"> i. The type of activity and where and when the activity will occur (i.e., a plan of operation); ii. A food, waste, and other “bear attractants” management plan; iii. Personnel training policies, procedures, and materials; iv. Site-specific polar bear interaction risk evaluation and mitigation measures; v. Polar bear avoidance and encounter procedures; and vi. Polar bear observation and reporting procedures. h. <u>Grizzly bears:</u> The lessee/operator/contractor would prepare and implement a grizzly bear interaction plan as necessary, in consultation with, and approved by the BLM and ADFG. 	<p>Required Operating Procedure 4</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 4</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Implement policies and procedures to conduct activities in a manner that minimizes adverse impacts on polar bears, their habitat, and their availability for subsistence uses. b. Implement adaptive management practices, such as temporal or spatial activity restrictions, in response to the presence of polar bears or polar bears engaged in a biologically significant activity, must be used to avoid interactions with and minimize impacts to them and their availability for subsistence uses. c. Cooperate with the BLM, USFWS and other designated federal, state, and local agencies to monitor and mitigate the impacts of Industry activities on polar bears through reporting the monitoring data to BLM and USFWS. d. Designate trained and qualified personnel (hired locally whenever possible) to monitor for the presence of polar bears, initiate mitigation measures, and monitor, record, and report the effects of Industry activities on polar bears. e. Provide polar bear awareness training that incorporates Indigenous knowledge, when available, to personnel. f. Contact affected subsistence communities and hunter organizations including the Alaska Nannut Co-Management Commission to discuss potential conflicts. g. <u>Polar bears:</u> The lessee/operator/contractor, as a part of lease operation planning, would prepare and implement polar bear-interaction plans to minimize conflicts between polar bears and humans. These polar bear interaction plans would be developed in consultation with local Tribal Governments and the community of Kaktovik and approved by the BLM and USFWS. These plans must include: <ul style="list-style-type: none"> i. The type of activity and where and when the activity would occur (i.e., a plan of operation); ii. A food, waste, and other “bear attractants” management plan; iii. Personnel training policies, procedures, and materials; iv. Site-specific polar bear interaction risk evaluation and mitigation measures; v. Polar bear avoidance and encounter procedures; and vi. Polar bear observation and reporting procedures. h. <u>Grizzly bears:</u> The lessee/operator/contractor would prepare and implement a grizzly bear interaction plan as necessary, in consultation with, and approved by the BLM and ADFG. The interaction plans would include appropriate Traditional knowledge on bear/human interactions, when available. 	<p>Required Operating Procedure 4</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Implement policies and procedures to conduct activities in a manner that minimizes adverse impacts on polar bears, their habitat, and their availability for subsistence uses. b. Implement adaptive management practices, such as temporal or spatial activity restrictions, in response to the presence of polar bears or polar bears engaged in a biologically significant activity, must be used to avoid interactions with and minimize impacts to them and their availability for subsistence uses. c. Cooperate with the BLM, USFWS and other designated federal, state, and local agencies to monitor and mitigate the impacts of Industry activities on polar bears through reporting the monitoring data to BLM and USFWS. d. Designate trained and qualified personnel (hired locally whenever possible) to monitor for the presence of polar bears, initiate mitigation measures, and monitor, record, and report the effects of Industry activities on polar bears. e. Provide polar bear awareness training that incorporates Indigenous knowledge, when available, to personnel. f. Contact affected subsistence communities and hunter organizations including the Alaska Nannut Co-Management Commission to discuss potential conflicts. g. <u>Polar bears:</u> The lessee/operator/contractor, as a part of lease operation planning, would prepare and implement polar bear-interaction plans to minimize conflicts between polar bears and humans. These polar bear interaction plans would be developed in consultation with local Tribal Governments and the community of Kaktovik and approved by the BLM and USFWS. These plans must include: <ul style="list-style-type: none"> i. The type of activity and where and when the activity would occur (i.e., a plan of operation); ii. A food, waste, and other “bear attractants” management plan; iii. Personnel training policies, procedures, and materials; iv. Site-specific polar bear interaction risk evaluation and mitigation measures; v. Polar bear avoidance and encounter procedures; and vi. Polar bear observation and reporting procedures. h. <u>Grizzly bears:</u> The lessee/operator/contractor would prepare and implement a grizzly bear interaction plan as necessary, in consultation with, and approved by the BLM and ADFG. The interaction plans would include appropriate Traditional knowledge on bear/human interactions, when available.
<p>Required Operating Procedure 5</p> <p><u>Objective:</u> Reduce air quality impacts.</p> <p><u>Requirement/Standard:</u> All oil and gas operations (vehicles and equipment) that burn diesel fuels must use ultra-low sulfur diesel, as defined by the EPA.</p>	<p>Required Operating Procedure 5</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 5</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 5</p> <p>Same as Alternative B.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 6</p> <p><u>Objective:</u> Prevent unnecessary or undue degradation of the air and lands and protect health.</p> <p><u>Requirement/Standard:</u></p> <p>a. All projects and permitted uses will comply with all applicable National and State Ambient Air Quality Standards (NAAQS/AAAQS) and ensure Air Quality Related Values (AQRVs) are protected under the Clean Air Act, or other applicable statutes.</p> <p>b. Prior to initiation of a NEPA analysis for an application to develop a CPF, production pad/well, airstrip, road, gas compressor station, or other potential air pollutant emission source (hereafter called project), the BLM Authorized Officer may require the project proponent to provide a minimum of 1 year of baseline ambient air monitoring data for pollutants of concern, as determined by the BLM. This would apply if no representative air monitoring data are available for the project area or if existing representative ambient air monitoring data are insufficient, incomplete, or do not meet minimum air monitoring standards set by the ADEC or the EPA. If the BLM determines that baseline monitoring is required, this pre-analysis data must meet ADEC and EPA air monitoring standards and cover the year before the submittal. Pre-project monitoring may not be appropriate where the life of the project is less than 1 year.</p> <p>c. For an application to develop a CPF, production pad/well, airstrip, road, gas compressor station, or other potential substantial air pollutant emission source:</p> <p>i. The project proponent shall prepare and submit for BLM approval an emissions inventory that includes quantified emissions of regulated air pollutants from all direct and indirect sources related to the proposed project, including reasonably foreseeable air pollutant emissions of criteria air pollutants, volatile organic compounds (VOCs), hazardous air pollutants, and greenhouse gases (GHGs) estimated for each year for the life of the project. The BLM uses this estimated emissions inventory to identify pollutants of concern and to determine the appropriate form of air analysis to be conducted for the proposed project.</p> <p>ii. The BLM may require air quality modeling for purposes of analyzing project direct, indirect, or cumulative impacts on air quality. The BLM may require air quality modeling depending on:</p> <ol style="list-style-type: none"> 1) the magnitude of potential air emissions from the project; 2) proximity to a federally mandated Class I area; 3) proximity to a population center; 4) location within or proximity to a nonattainment or maintenance area; 	<p>Required Operating Procedure 6</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 6</p> <p><u>Objective:</u> Same as Alternative B</p> <p><u>Requirement/Standard:</u></p> <p>a. All relevant projects and permitted uses would comply with all applicable NAAQS/ AAAQS and ensure AQRVs are protected under the Clean Air Act, or other applicable statutes.</p> <p>b. Prior to initiation of a NEPA analysis for an application to develop a CPF, production pad/well, airstrip, road, gas compressor station, or other potential air pollutant emission source (hereafter called project), the BLM Authorized Officer may require the project proponent to provide a minimum of 1 year of baseline ambient air monitoring data for pollutants of concern. Such a determination would be made in consultation with the EPA/ADEC and with the permittee, to assess the technical practicability of any new data collection. This would apply if no representative air monitoring data are available for the project area or if existing representative ambient air monitoring data are insufficient, incomplete, or do not meet minimum air monitoring standards set by the ADEC or the EPA. If it is determined that baseline monitoring is required, this pre-analysis data must meet ADEC and EPA air monitoring standards and cover the year before the submittal. Pre-project monitoring would not be required when the life of the project is less than 1 year.</p> <p>c. For an application to develop a CPF, production pad/well, airstrip, road, gas compressor station, or other potential substantial air pollutant emission source:</p> <p>i. The project proponent shall prepare and submit for approval an emissions inventory that includes quantified emissions of regulated air pollutants from all direct and indirect sources related to the proposed project, including reasonably foreseeable air pollutant emissions of criteria air pollutants, VOCs, hazardous air pollutants, and GHGs estimated for each year for the life of the project. The estimated emissions inventory would be used to identify pollutants of concern and to determine the appropriate form of air analysis to be conducted for the proposed project.</p> <p>ii. Air quality modeling may be required for the purposes of analyzing project direct, indirect, or cumulative impacts on air quality. The BLM would base its determination to require air quality modeling on:</p> <ol style="list-style-type: none"> 1) the magnitude of potential air emissions from the project; 2) proximity to a federally mandated Class I area; 3) proximity to a population center; 4) location within or proximity to a nonattainment or maintenance area; 5) meteorological or geographic conditions; 6) existing air quality conditions; 	<p>Required Operating Procedure 6</p> <p><u>Objective:</u> Same as Alternative B</p> <p><u>Requirement/Standard:</u></p> <p>a. All relevant projects and permitted uses would comply with all applicable NAAQS/ AAAQS and ensure AQRVs are protected under applicable statutes.</p> <p>b. Prior to initiation of a NEPA analysis for an application to develop a CPF, production pad/well, airstrip, road, gas compressor station, or other potential air pollutant emission source (hereafter called project), the BLM Authorized Officer, in coordination with the USFWS, may require the project proponent to provide a minimum of 1 year of baseline ambient air monitoring data for pollutants of concern. Such a determination would be made in consultation with the EPA/ADEC and with the permittee, to assess the technical practicability of any new data collection. This would apply if no representative air monitoring data are available for the project area or if existing representative ambient air monitoring data are insufficient, incomplete, or do not meet minimum air monitoring standards set by the ADEC or the EPA. If it is determined that baseline monitoring is required, this pre-analysis data must meet ADEC and EPA air monitoring standards and cover the year before the submittal. Pre-project monitoring would not be required when the life of the project is less than 1 year.</p> <p>c. For an application to develop a CPF, production pad/well, airstrip, road, gas compressor station, or other potential substantial air pollutant emission source:</p> <p>i. The project proponent shall prepare and submit for approval an emissions inventory that includes quantified emissions of regulated air pollutants from all direct and indirect sources related to the proposed project, including reasonably foreseeable air pollutant emissions of criteria air pollutants, VOCs, hazardous air pollutants, and GHGs estimated for each year for the life of the project. The estimated emissions inventory would be used to identify pollutants of concern and to determine the appropriate form of air analysis to be conducted for the proposed project.</p> <p>ii. Air quality modeling may be required for the purposes of analyzing project direct, indirect, or cumulative impacts on air quality. The BLM would base its determination to require air quality modeling on:</p> <ol style="list-style-type: none"> 1) the magnitude of potential air emissions from the project; 2) proximity to a federally mandated Class I area; 3) proximity to a population center; 4) location within or proximity to a nonattainment or maintenance area; 5) meteorological or geographic conditions; 6) existing air quality conditions; 7) magnitude of existing development in the area; or 8) issues identified during the NEPA process.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>5) meteorological or geographic conditions; 6) existing air quality conditions; 7) magnitude of existing development in the area; or 8) issues identified during the NEPA process.</p> <p>The BLM will determine the information required for a project-specific modeling analysis through the development of a modeling protocol for each analysis. The BLM will consult with appropriate federal (including federal land managers), State, and/or local agencies regarding modeling to inform its modeling decision and avoid duplication of effort. The modeling shall compare predicted impacts to all applicable local, State, and federal air quality standards and increments, as well as other scientifically defensible significance thresholds (such as impacts on AQRVs, incremental cancer risks, etc.).</p> <p>iii. The BLM may require the proponent to provide an emissions reduction plan that includes a detailed description of operator-committed measures to reduce project-related air pollutant emissions, including, but not limited to, criteria pollutants, GHGs, heavy metals, mercury, and fugitive dust.</p> <p>d. Air monitoring or air modeling reports will be provided to the BLM; federal land managers; federal, state, local community, or Tribal governments; and other interested parties, as appropriate.</p> <p>e. The BLM may require monitoring for the life of the project depending on:</p> <ul style="list-style-type: none"> i. the magnitude of potential air emissions from the project; ii. proximity to a federally mandated Class I area; iii. proximity to a population center; iv. location within or proximity to a nonattainment or maintenance area; v. meteorological or geographic conditions; vi. existing air quality conditions; vii. magnitude of existing development in the area; or viii. issues identified during the NEPA process. <p>f. If ambient air monitoring or air quality modeling indicates that project-related emissions cause or contribute to impacts, unnecessary or undue degradation of the lands, exceedances of the NAAQS/AAAQS, or fails to protect health (either directly or through use of subsistence resources), then the BLM may require changes or additional emission control strategies. To reduce or minimize emissions from proposed activities, in order to comply with the NAAQS/AAAQS and/or minimize impacts on AQRVs, the BLM shall consider air quality mitigation measure(s) within its authority in addition to regulatory requirements and proponent-committed emission reduction measures, and also for emission sources not otherwise regulated by ADEC or EPA. Mitigation measures will be analyzed through the appropriate form of NEPA analysis to determine effectiveness. The BLM will consult with the federal land managers and other appropriate federal, state, and/or local agencies to determine potential mitigation options for any predicted significant impacts from the proposed project development.</p>	<p>(see above)</p>	<p>7) magnitude of existing development in the area; or 8) issues identified during the NEPA process.</p> <p>The BLM would determine the information required for a project-specific modeling analysis through the development of a modeling protocol for each analysis. The BLM would consult with appropriate federal (including federal land managers), State, and/or local agencies regarding modeling to inform its modeling decision and avoid duplication of effort.</p> <p>iii. The BLM may require the proponent to provide an emissions reduction plan that includes a detailed description of operator-committed measures to reduce project-related air pollutant emissions, including, but not limited to, criteria pollutants, GHGs, heavy metals, mercury, and fugitive dust.</p> <p>d. Air monitoring or air modeling reports will be provided to the BLM; federal land managers; federal, state, local community, or affected Tribal governments; and other interested parties, as appropriate.</p> <p>e. The BLM may require monitoring for the life of the project based on:</p> <ul style="list-style-type: none"> i. the magnitude of potential air emissions from the project; ii. proximity to a federally mandated Class I area; iii. proximity to a population center; iv. location within or proximity to a nonattainment or maintenance area; v. meteorological or geographic conditions; vi. existing air quality conditions; vii. magnitude of existing development in the area; or viii. issues identified during the NEPA process. <p>f. If ambient air monitoring or air quality modeling indicates that project-related emissions cause or contribute to impacts, unnecessary or undue degradation of the lands including AQRVs, exceedances of the NAAQS/AAAQS, or fails to protect health (either directly or through use of subsistence resources), then the BLM may require changes to a project proposal or propose mitigation to reduce air impacts. Project changes and mitigation measures will be analyzed through appropriate NEPA analysis to determine effectiveness.</p> <p>g. Publicly available reports on air quality baseline monitoring, emissions inventory, and modeling results developed in conformance with this ROP shall be provided by the project proponent to the NSB and to local communities and Tribal Governments in a timely manner.</p>	<p>The BLM would determine the information required for a project-specific modeling analysis through the development of a modeling protocol for each analysis. The BLM would consult with appropriate federal (including federal land managers), State, and/or local agencies regarding modeling to inform its modeling decision and avoid duplication of effort.</p> <p>iii. The BLM may require the proponent to provide an emissions reduction plan that includes a detailed description of operator-committed measures to reduce project-related air pollutant emissions, including, but not limited to, criteria pollutants, heavy metals, mercury, and fugitive dust.</p> <p>d. Air monitoring or air modeling reports will be provided to the BLM; federal land managers; federal, state, local community, or affected Tribal governments; and other interested parties, annually or at a frequency set by the BLM Authorized Officer.</p> <p>e. The BLM may require monitoring for the life of the project based on:</p> <ul style="list-style-type: none"> i. the magnitude of potential air emissions from the project; ii. proximity to a federally mandated Class I area; iii. proximity to a population center; iv. location within or proximity to a nonattainment or maintenance area; v. meteorological or geographic conditions; vi. existing air quality conditions; vii. magnitude of existing development in the area; or viii. issues identified during the NEPA process. <p>f. If ambient air monitoring or air quality modeling indicates that project-related emissions cause or contribute to significantly adverse effects on surface resources, including from degradation of AQRVs and/or exceedances of the NAAQS/AAAQS, or fails to protect health (either directly or through use of subsistence resources), then the BLM may require changes to a project proposal or propose mitigation to reduce air impacts. Project changes and mitigation measures will be analyzed through appropriate NEPA analysis to determine effectiveness.</p> <p>g. Publicly available reports on air quality baseline monitoring, emissions inventory, and modeling results developed in conformance with this ROP shall be provided by the project proponent to the NSB and to local communities and Tribal Governments in a timely manner.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
g. Publicly available reports on air quality baseline monitoring, emissions inventory, and modeling results developed in conformance with this ROP shall be provided by the project proponent to the NSB and to local communities and tribes in a timely manner.	(see above)	(see above)	(see above)
<p>Required Operating Procedure 7</p> <p>No similar objective or requirement/standard.</p>	<p>Required Operating Procedure 7</p> <p><u>Objective:</u> Ensure that permitted activities do not create human health risks by contaminating subsistence foods.</p> <p><u>Requirement/Standard:</u> A lessee/operator/contractor proposing a permanent oil and gas development would design and implement a monitoring study of contaminants in locally used subsistence foods. The monitoring study preparers would examine subsistence foods for all contaminants that could be associated with the proposed development. The study would identify the level of contaminants in subsistence foods before the proposed permanent oil and gas development and would monitor the level of these contaminants throughout the operation and abandonment phases. If ongoing monitoring detects a measurable and persistent increase in a contaminant in subsistence foods, the operator would design and implement a study to determine how much, if any, of the increase originates from the operator's activities. If the study preparers determine that a portion of the increase in contamination is caused by the operator's activities, the BLM Authorized Officer may require changes in the operator's processes to reduce or eliminate emissions of the contaminant. The design of the study must meet the approval of the BLM Authorized Officer, who may coordinate with appropriate entities before approving the study design. The BLM Authorized Officer may require or authorize changes in the design of the studies throughout the operations and abandonment period or terminate or suspend studies if results warrant.</p>	<p>Required Operating Procedure 7</p> <p><u>Objective:</u> Same as Alternative C.</p> <p><u>Requirement/Standard:</u> A lessee/operator/contractor proposing a permanent oil and gas development would design and implement a monitoring study of contaminants in locally used subsistence foods. The monitoring study preparers would examine subsistence foods for all contaminants that could be associated with the proposed development. The study would identify the level of contaminants in subsistence foods before the proposed permanent oil and gas development and would monitor the level of these contaminants throughout the operation and abandonment phases. The study would include coordinating with Tribal Governments to include Indigenous knowledge of contaminants to subsistence foods, when available. If ongoing monitoring detects a measurable and persistent increase in a contaminant in subsistence foods, the operator would design and implement a study to determine how much, if any, of the increase originates from the operator's activities. If the study preparers determine that a portion of the increase in contamination is caused by the operator's activities, the BLM Authorized Officer may require changes in the operator's processes to reduce or eliminate emissions of the contaminant. The design of the study must meet the approval of the BLM Authorized Officer and Tribal Governments, who may coordinate with appropriate entities before approving the study design. The BLM Authorized Officer, in coordination with Tribal Governments, may require or authorize changes in the design of the studies throughout the operations and abandonment period or terminate or suspend studies if results warrant.</p>	<p>Required Operating Procedure 7</p> <p><u>Objective:</u> Same as Alternative C.</p> <p><u>Requirement/Standard:</u> A lessee/operator/contractor proposing a permanent oil and gas development would design and implement a monitoring study of contaminants in locally used subsistence foods. The monitoring study preparers would examine subsistence foods for all contaminants that could be associated with the proposed development. The study would identify the level of contaminants in subsistence foods before the proposed permanent oil and gas development and would monitor the level of these contaminants throughout the operation and abandonment phases. The study would include coordinating with Tribal Governments to include Indigenous knowledge of contaminants to subsistence foods, when available. If ongoing monitoring detects a measurable and persistent increase in a contaminant in subsistence foods, the operator would design and implement a study to determine how much, if any, of the increase originates from the operator's activities. If the study preparers determine that a portion of the increase in contamination is caused by the operator's activities, the BLM Authorized Officer in coordination with the USFWS may require changes in the operator's processes to reduce or eliminate emissions of the contaminant. The design of the study must meet the approval of the BLM Authorized Officer and Tribal Governments, who may coordinate with appropriate entities before approving the study design. The BLM Authorized Officer, in coordination with the USFWS, and Tribal Governments, may require or authorize changes in the design of the studies throughout the operations and abandonment period or terminate or suspend studies if results warrant.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
WATER USE FOR PERMITTED ACTIVITIES			
<p>Required Operating Procedure 8</p> <p><u>Objective:</u> In flowing waters (rivers, springs, and streams), ensure water of sufficient quality and quantity to conserve fish, waterbirds, and wildlife populations and habitats in their natural diversity.</p> <p><u>Requirement/Standard:</u> Withdrawal of unfrozen water from springs, rivers, and streams during winter (onset of freeze-up to break-up) is prohibited. The removal of ice aggregate from grounded areas 4 feet deep or less may be authorized from rivers on a site-specific basis.</p>	<p>Required Operating Procedure 8</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 8</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The removal of ice aggregate from aufeis fields identified in Lease Stipulation 3 and aufeis fields along the Canning River is prohibited. The removal of ice aggregate from grounded areas 4 feet deep or less may be authorized from rivers on a site-specific basis.</p> <p>Winter Water Use</p> <p>a. Withdrawal of unfrozen water from springs, rivers, and streams during winter (onset of freeze-up to break-up) is prohibited.</p> <p>Summer Water Use</p> <p>a. Water withdrawals from springs identified in Lease Stipulation 3 is prohibited. Withdrawal of unfrozen water would be prohibited from the following rivers that support resident, anadromous, or endemic fish populations:</p> <ul style="list-style-type: none"> i. Canning/Staines River ii. West Fork Tamayariak River iii. Middle Fork Tamayariak River iv. Tamayariak River v. Itkilyariak Creek vi. Hulahula River vii. Aichilik River viii. Sadlerochit River ix. Sadlerochit Spring Creek <p>b. Requests for summer water use from rivers and streams that do not support populations of resident, anadromous, or endemic fish must be made separately, and the volume allowance would be evaluated on a case-by-case basis. Approval from the BLM Authorized Officer is required.</p> <p>c. Additional modeling or monitoring may be required to assess water level and water quality conditions before, during, and after water use from any river in summer.</p>	<p>Required Operating Procedure 8</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The removal of ice aggregate from aufeis fields identified in Lease Stipulation 3 and aufeis fields along the Canning River is prohibited. The removal of ice aggregate from grounded areas 4 feet deep or less may be authorized from rivers on a site-specific basis.</p> <p>Winter Water Use</p> <p>a. Withdrawal of unfrozen water from springs, rivers, and streams during winter (onset of freeze-up to break-up) is prohibited.</p> <p>Summer Water Use</p> <p>a. Water withdrawals from springs identified in Lease Stipulation 3 is prohibited. Withdrawal of unfrozen water would be prohibited from the following rivers that support resident, anadromous, or endemic fish populations:</p> <ul style="list-style-type: none"> x. Canning/Staines River xi. West Fork Tamayariak River xii. Middle Fork Tamayariak River xiii. Tamayariak River xiv. Itkilyariak Creek xv. Hulahula River xvi. Aichilik River xvii. Sadlerochit River xviii. Sadlerochit Spring Creek <p>b. Requests for summer water use from rivers and streams that do not support populations of resident, anadromous, or endemic fish must be made separately, and the volume allowance would be evaluated on a case-by-case basis. Approval from the BLM Authorized Officer in coordination with the USFWS and local traditional knowledge holders is required.</p> <p>c. Additional modeling or monitoring may be required to assess water level and water quality conditions before, during, and after water use from any river in summer.</p>
<p>Required Operating Procedure 9</p> <p><u>Objective:</u> Maintain natural hydrologic regimes in soils surrounding lakes and ponds, and maintain populations of, and adequate habitat for, fish, birds, and aquatic invertebrates.</p> <p><u>Requirement/Standard:</u> Withdrawal of unfrozen water from lakes and the removal of ice aggregate from grounded areas 4 feet deep or less during winter (onset of freeze-up to break-up) and withdrawal of water from lakes during the summer may be authorized on a site-specific basis, depending on water volume and depth, the fish community, and connectivity to other lakes or streams and adjacent bird nesting sites. Current water use guidelines are as follows:</p>	<p>Required Operating Procedure 9</p> <p><u>Objective:</u> Same as Alternatives B.</p> <p><u>Requirement/Standard:</u> Same as Alternative B with the following additional requirement:</p> <p>Additional modeling and monitoring of lake recharge may be required to ensure natural hydrologic regime, water quality, and aquatic habitat for birds.</p>	<p>Required Operating Procedure 9</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Withdrawal of unfrozen water from lakes or artificial water reservoirs and the removal of ice aggregate from grounded areas 4 feet deep or less during winter (onset of freeze-up to break-up) and withdrawal of water from lakes or artificial water reservoirs during the summer may be authorized on a site-specific basis, depending on water volume and depth, the fish community, and connectivity to other lakes or streams and adjacent bird nesting habitat. Current water use guidelines are as follows:</p>	<p>Required Operating Procedure 9</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Withdrawal of unfrozen water from lakes or artificial water reservoirs and the removal of ice aggregate from grounded areas 4 feet deep or less during winter (onset of freeze-up to break-up) and withdrawal of water from lakes or artificial water reservoirs during the summer may be authorized on a site-specific basis, depending on water volume and depth, the fish community, and connectivity to other lakes or streams and adjacent bird nesting habitat. Implement policies and procedures to conduct activities in a manner that minimizes adverse impacts on fish, their habitat, and their availability for subsistence uses.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p><u>Winter Water Use</u></p> <ul style="list-style-type: none"> a. Lakes with fish except ninespine stickleback or Alaska blackfish: unfrozen water available for withdrawal is limited to 15 percent of calculated volume deeper than 7 feet; only ice aggregate may be removed from lakes that are 7 feet deep or less. b. Lakes with only ninespine stickleback or Alaska blackfish: unfrozen water available for withdrawal is limited to 30 percent of calculated volume deeper than 5 feet; only ice aggregate may be removed from Lakes with no fish, regardless of depth: water available for use is limited to 20 percent of total lake volume. c. In lakes where unfrozen water and ice aggregate are both removed, the total use would not exceed the respective 15 percent, 20 percent, or 30 percent volume calculations above, unless recharge calculations, river overbank flooding, or a connection to a stream or river indicate recharge will replenish full water withdrawal plus additional ice aggregate withdrawal amounts above these limits. d. Compacting snow cover or removing snow from fish-bearing water bodies would be prohibited, except at approved ice road crossings, water pumping stations on lakes, or areas of grounded ice. <p><u>Summer Water Use</u></p> <ul style="list-style-type: none"> a. Requests for summer water use must be made separately, and the volume allowance would be evaluated on a case-by-case basis. Approval from the BLM Authorized Officer is required. <p><u>All Water Use</u></p> <ul style="list-style-type: none"> a. Any water intake structures in fish-bearing or non-fish-bearing waters would be designed, operated, and maintained to prevent fish entrapment, entrainment, or injury. Note: All water withdrawal equipment must be equipped with and use fish screening devices approved by the BLM and ADFG, Division of Habitat. b. Additional modeling or monitoring may be required to assess water level and water quality conditions before, during, and after water use from any fish-bearing lake or lake of special concern. Lakes that are 5 feet deep or less. 	<p>(see above)</p>	<p><u>Winter Water Use</u></p> <ul style="list-style-type: none"> a. Lakes with sensitive fish (i.e., any fish except ninespine stickleback or Alaska blackfish): unfrozen water available for withdrawal is limited to 15 percent of calculated volume deeper than 7 feet. b. Lakes with only nonsensitive fish (i.e., ninespine stickleback or Alaska blackfish): unfrozen water available for withdrawal is limited to 30 percent of calculated volume deeper than 5 feet. c. Lakes with no fish, regardless of depth: water available for use is limited to 20 percent of total lake volume. d. Ice aggregate may be removed from grounded areas 4 feet deep or less on any lake. In lakes where unfrozen water and ice aggregate are both removed, the total use would not exceed the respective 15 percent, 20 percent, or 30 percent volume calculations above, unless recharge calculations, river overbank flooding, or a connection to a stream or river indicate recharge will replenish full water withdrawal plus additional ice aggregate withdrawal amounts above these limits. e. Compacting snow cover or removing snow from fish-bearing water bodies would be prohibited, except at approved ice road crossings, water pumping stations on lakes, or areas of grounded ice. <p><u>Summer Water Use</u></p> <ul style="list-style-type: none"> a. Requests for summer water use must be made separately, and the volume allowance would be evaluated on a case-by-case basis. Approval from the BLM Authorized Officer is required. <p><u>All Water Use</u></p> <ul style="list-style-type: none"> a. Any water intake structures in fish-bearing or non-fish-bearing waters would be designed, operated, and maintained to prevent fish entrapment, entrainment, or injury. Note: All water withdrawal equipment must be equipped with and use fish screening devices approved by the BLM and ADFG, Division of Habitat. b. Additional modeling or monitoring may be required to assess water level and water quality conditions before, during, and after water use from any fish-bearing lake or lake of special concern. c. Local Traditional knowledge will be used, when available, in monitoring and modeling efforts. d. Additional modeling and monitoring of lake recharge may be required to ensure natural hydrologic regime, water quality, and aquatic habitat for birds. <ul style="list-style-type: none"> i. A daily record of water removed as unfrozen water or ice aggregate (separately) must be maintained and submitted to the BLM with the weekly report of activities. Submitting water and ice use in the format specified by the BLM is required. These modeling and monitoring efforts must include local traditional knowledge, when available, to define the natural hydrologic regime, water quality, and aquatic habitat for birds to understand impacts. 	<p>Current water use guidelines are as follows:</p> <p><u>All Water Use</u></p> <ul style="list-style-type: none"> a. Any water intake structures in fish-bearing or non-fish-bearing waters would be designed, operated, and maintained to prevent fish entrapment, entrainment, or injury. Note: All water withdrawal equipment must be equipped with and use fish screening devices approved by the BLM and ADFG, Division of Habitat. b. Additional modeling or monitoring is required to assess water level, water quality conditions, and recharge before, during, and after water use from all lakes to ensure natural hydrologic regime, water quality, and aquatic habitat connectivity for birds and fish species. c. Local Traditional knowledge will be used, when available, in monitoring and modeling efforts. d. A daily record of water removed as unfrozen water or ice aggregate (separately) must be maintained and submitted to the BLM with the weekly report of activities. Submitting water and ice use in the format specified by the BLM is required. These modeling and monitoring efforts must include local traditional knowledge, when available, to define the natural hydrologic regime, water quality, and aquatic habitat for birds to understand impacts. e. The BLM must be notified within 48 hours of any observation of dead or injured fish on water source intake screens, in the hole being used for pumping, or within any portion of ice roads or pads. If observed at a particular lake, pumping must cease temporarily from that hole until additional preventative measures are taken to avoid further impacts on fish. f. The BLM must be notified within 48 hours if water removal exceeds the volume approved at any lake. <p><u>Winter Water Use</u></p> <ul style="list-style-type: none"> a. Lakes with sensitive fish (i.e., any fish except ninespine stickleback or Alaska blackfish): unfrozen water available for withdrawal is limited to 15 percent of calculated volume deeper than 7 feet. When both ice and water are being withdrawn, withdrawal is limited to 20 percent of the calculated lake volume if the conditions in (b) above are met. b. Lakes with only nonsensitive fish (i.e., ninespine stickleback or Alaska blackfish): unfrozen water available for withdrawal is limited to 30 percent of calculated volume deeper than 5 feet. When both ice and water are being withdrawn, withdrawal is limited to 20 percent of the calculated lake volume if the conditions in (b) above are met. c. Lakes with no fish, regardless of depth: water available for use is limited to 20 percent of total lake volume.

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	ii. The BLM must be notified within 48 hours of any observation of dead or injured fish on water source intake screens, in the hole being used for pumping, or within any portion of ice roads or pads. If observed at a particular lake, pumping must cease temporarily from that hole until additional preventative measures are taken to avoid further impacts on fish. iii. The BLM must be notified within 48 hours if water removal exceeds the volume approved at any lake	d. Compacting snow cover or removing snow from fish-bearing water bodies would be prohibited, except at approved ice road crossings, water pumping stations on lakes, or areas of grounded ice. <u>Summer Water Use</u> a. Requests for summer water use must be made separately, and the volume allowance would be evaluated on a case-by-case basis. Approval from the BLM Authorized Officer in coordination with the USFWS is required.
WINTER OVERLAND MOVES AND SEISMIC WORK The following ROPs apply to overland and over-ice moves, seismic work, and any similar cross-country vehicle use and heavy equipment on surfaces without roads during winter. These restrictions do not apply to the use of such equipment on ice roads after they are constructed.			
Required Operating Procedure 10 <u>Objective:</u> Protect grizzly bear, polar bear, and seal denning and birthing locations. <u>Requirement/Standard:</u> a. Grizzly bear dens: Cross-country use of all vehicles, equipment, and oil and gas activity is prohibited within 0.5 miles of occupied grizzly bear dens identified by the ADFG or the USFWS, unless alternative protective measures are approved by the BLM Authorized Officer, in consultation with the ADFG. b. Polar bear dens: Cross-country use of vehicles, equipment, oil and gas activity, and seismic survey activity is prohibited within 1 mile of known or observed polar bear dens, unless alternative protective measures are approved by the BLM Authorized Officer and are consistent with the MMPA and the ESA. <u>Polar bear and seal mitigation measures for onshore activities.</u> a. In order to limit disturbance around known polar bear dens: <ol style="list-style-type: none"> i. <i>Attempt to locate polar bear dens.</i> Operators seeking to carry out onshore activities during the denning season must conduct two separate surveys for occupied polar bear dens in all denning habitat within 1.6 km (1 mi) of proposed activities using aerial infrared (AIR) imagery. The first survey must occur between the dates of November 25 and December 15, and the second between the dates of December 5 and December 31. AIR surveys will be conducted during darkness or civil twilight and not during daylight hours. Ideal environmental conditions during surveys would be clear, calm, and cold. If there is blowing snow, and form of precipitation, or other sources of airborne moisture, use of AIR detection is not advised. Flight crews will record and report environmental parameters including air temperature, dew point, wind speed and direction, cloud ceiling, and percent humidity, and a flight log will be provided to BLM and USFWS within 48 hours of the flight. A scientist with experience in the in-air interpretation of AIR imagery will be on board to analyze the AIR data in real time. The data (infrared video) will be made available for viewing by BLM and USFWS immediately upon return of the survey aircraft 	Required Operating Procedure 10 <u>Objective:</u> Same as Alternative B <u>Requirement/Standard:</u> Same as Alternative B with the following additional requirements: a. In addition to any NMFS MMPA requirements: Prior to operating in the nearshore areas (≤ 3 m water depth) during the ice-covered season (between approximately November-June of any year), a lessee/operator/contractor working in seal lair habitat would conduct a survey to detect seal lairs, in consultation with the NMFS, throughout the planned area of activities.	Required Operating Procedure 10 <u>Objective:</u> Same as Alternative B. <u>Requirement/Standard:</u> In addition to any NMFS MMPA requirements: Prior to operating in the nearshore areas (≤ 3 m water depth) during the ice-covered season (between approximately November-June of any year), a lessee/operator/contractor working in seal lair habitat would conduct a survey to detect seal lairs, in consultation with the NMFS, throughout the planned area of activities. a. Grizzly bear dens: Cross-country use of all vehicles, equipment, and oil and gas activity is prohibited within 1.0 miles of occupied grizzly bear dens identified by the ADFG or the USFWS, unless alternative protective measures are approved by the BLM Authorized Officer, in consultation with the ADFG and Tribal Governments. b. Polar bear dens: Cross-country use of vehicles, equipment, oil and gas activity, and seismic survey activity is prohibited within 1 mile of known, observed, or suspected polar bear dens, unless alternative protective measures are approved by the BLM Authorized Officer, in coordination with Tribal Governments, and are consistent with the MMPA and the ESA. <u>Polar bear and seal mitigation measures for onshore activities.</u> a. In order to limit disturbance around known polar bear dens: <ol style="list-style-type: none"> i. <i>Attempt to locate polar bear dens.</i> Operators seeking to carry out onshore activities during the denning season must conduct two separate surveys for occupied polar bear dens in all denning habitat within 1.6 km (1 mi) of proposed activities using aerial infrared (AIR) imagery. The first survey must occur between the dates of November 25 and December 15, and the second between the dates of December 5 and December 31. AIR surveys will be conducted during darkness or civil twilight and not during daylight hours. Ideal environmental conditions during surveys would be clear, calm, and cold. If there is blowing snow, and form of precipitation, or other sources of airborne moisture, use of AIR detection is not advised. Flight crews will record and report environmental parameters including air temperature, dew point, wind speed and direction, cloud ceiling, and percent humidity, and a flight log will be provided to BLM and USFWS within 	Required Operating Procedure 10 <u>Objective:</u> Same as Alternative B. <u>Requirement/Standard:</u> In addition to any NMFS MMPA requirements: Prior to operating in the nearshore areas (≤ 3 m water depth) during the ice-covered season (between approximately November-June of any year), a lessee/operator/contractor working in seal lair habitat would conduct a survey to detect seal lairs, in consultation with the NMFS, throughout the planned area of activities. a. Grizzly bear dens: Cross-country use of all vehicles, equipment, and oil and gas activity is prohibited within 1.0 miles of occupied grizzly bear dens identified by the ADFG or the USFWS, unless alternative protective measures are approved by the BLM Authorized Officer, in coordination with the USFWS, ADFG and Tribal Governments. b. Polar bear dens: Cross-country use of vehicles, equipment, oil and gas activity, and seismic survey activity is prohibited within 1 mile of known, observed, or suspected polar bear dens, unless alternative protective measures are approved by the BLM Authorized Officer, in coordination with the USFWS and Tribal Governments, and are consistent with the MMPA and the ESA. <u>Polar bear and seal mitigation measures.</u> a. In order to limit disturbance around known polar bear dens: <ol style="list-style-type: none"> i. <i>Attempt to locate polar bear dens.</i> Operators seeking to carry out onshore activities during the denning season must conduct two separate surveys for occupied polar bear dens in all denning habitat within 1.6 km (1 mi) of proposed activities using aerial infrared (AIR) imagery. The first survey must occur between the dates of November 25 and December 15, and the second between the dates of December 5 and December 31. AIR surveys will be conducted during darkness or civil twilight and not during daylight hours. Ideal environmental conditions during surveys would be clear, calm, and cold. If there is blowing snow, and form of precipitation, or other sources of airborne moisture, use of AIR detection is not advised. Flight crews will record and report environmental parameters including air temperature, dew point, wind speed and direction, cloud ceiling, and percent humidity, and a flight log will be provided to BLM and USFWS within 48 hours of the flight. A scientist with experience in the in-air interpretation

Alternative B	Alternative C	Alternative D	Alternative D2
<p>to the base of operations. All observed or suspected polar bear dens must be reported to BLM and USFWS prior to the initiation of activities.</p> <p>ii. <i>Observe the exclusion zone around known polar bear dens.</i> Operators must observe a 1.6-km (1-mi) operational exclusion zone around all known polar bear dens during the denning season (approximately November–April, or until the female and cubs leave the areas). Should previously unknown occupied dens be discovered within 1 mi of activities, work must cease and the BLM and USFWS contacted for guidance. The BLM and USFWS would evaluate these instances on a case-by-case basis to recommend the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified.</p> <p>iii. <i>Use the den habitat map developed by the US Geological Survey (USGS).</i> This measure ensures that the location of potential polar bear dens is considered when conducting activities in the coastal areas of the Beaufort Sea.</p> <p>iv. <i>Polar bear den restrictions.</i> Restrict the timing of the activity to limit disturbance around dens.</p> <p>b. In order to limit disturbance of activities to seal lairs in the nearshore area (≤ 3 m water depth):</p> <p>Specific to seismic operations:</p> <p>a. Before the seismic survey begins, the operator would conduct a sound source verification test to measure the distance of vibroseis⁷ sound levels through grounded ice to the 120 decibels (dB) re 1 μPa threshold in open water and water within ungrounded ice. Once that distance is determined, it would be shared with the BLM and NMFS. The distance would be used to buffer all on-ice seismic survey activity operations from any open water or ungrounded ice throughout the project area. The operator would draft a formal study proposal that would be submitted to the BLM and NMFS for review and approval before the activity begins.</p> <p>For all activities:</p> <p>a. Maintain airborne sound levels of equipment below 100 dB re 20 μPa at 66 feet. If different equipment would be used than was originally proposed, the applicant must inform the BLM Authorized Officer and share sound levels and air and water attenuation information for the new equipment.</p> <p>b. On-ice operations after May 1 would employ a full-time trained protected species observer (PSO) on vehicles to ensure all basking seals are avoided by vehicles by at least 500 feet and would ensure that all equipment with airborne noise levels above 100 dB re 20 μPa were operating at distances from observed seals that allowed for the attenuation of noise to levels below 100 dB. All sightings of</p>	<p>(see above)</p>	<p>48 hours of the flight. A scientist with experience in the in-air interpretation of AIR imagery will be on board to analyze the AIR data in real time. The data (infrared video) will be made available for viewing by BLM and USFWS immediately upon return of the survey aircraft to the base of operations. All observed or suspected polar bear dens must be reported to BLM and USFWS prior to the initiation of activities.</p> <p>ii. <i>Observe the exclusion zone around known polar bear dens.</i> Operators must observe a 1.6-km (1-mi) operational exclusion zone around all known polar bear dens during the denning season (approximately November–April, or until the female and cubs leave the areas). Should previously unknown occupied dens be discovered within 1 mi of activities, work must cease and the BLM and USFWS contacted for guidance. The BLM and USFWS would evaluate these instances on a case-by-case basis to recommend the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified.</p> <p>iii. <i>Use the den habitat map developed by the US Geological Survey (USGS).</i> This product will help locate potential polar bear dens when conducting activities in the coastal areas of the Beaufort Sea. This measure helps identify the location of potential polar bear dens and ensures they are considered when conducting activities in the coastal areas of the Beaufort Sea.</p> <p>iv. <i>Polar bear den restrictions.</i> Restrict the timing of the activity to range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified.</p> <p>b. In order to limit disturbance around known polar bear dens:</p> <p>Monitoring requirements</p> <p>a. Develop and implement a site-specific, BLM and USFWS-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on polar bears, and the subsistence use of this species.</p> <p>b. Provide trained, qualified, and BLM and USFWS-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan.</p> <p>c. For offshore activities, provide trained, qualified, and BLM and USFWS-approved observers on board all operational and support vessels to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan.</p> <p>d. Cooperate with the BLM and USFWS and other designated Federal, State, and local agencies to monitor the impacts of Industry activities on polar bears. Where information is insufficient to evaluate the potential effects of activities on polar bears, and the subsistence use of this species, operators may be required to participate in joint monitoring and/or research efforts to address these information needs and ensure the least practicable impact to these resources.</p>	<p>of AIR imagery will be on board to analyze the AIR data in real time. The data (infrared video) will be made available for viewing by BLM and USFWS immediately upon return of the survey aircraft to the base of operations. All observed or suspected polar bear dens must be reported to BLM and USFWS prior to the initiation of activities.</p> <p>ii. <i>Observe the exclusion zone around known polar bear dens.</i> Operators must observe a 1.6-km (1-mi) operational exclusion zone around all known polar bear dens during the denning season (approximately November–April, or until the female and cubs leave the areas). Should previously unknown occupied dens be discovered within 1 mi of activities, work must cease and the BLM and USFWS contacted for guidance. The BLM and USFWS would evaluate these instances on a case-by-case basis to recommend the appropriate action. Potential actions may range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified.</p> <p>iii. <i>Use the den habitat map developed by the US Geological Survey (USGS).</i> This product will help locate potential polar bear dens when conducting activities in the coastal areas of the Beaufort Sea. This measure helps identify the location of potential polar bear dens and ensures they are considered when conducting activities in the coastal areas of the Beaufort Sea.</p> <p>iv. <i>Polar bear den restrictions.</i> Restrict the timing of the activity to range from cessation or modification of work to conducting additional monitoring, and the holder of the authorization must comply with any additional measures specified.</p> <p>b. In order to limit disturbance around known polar bear dens:</p> <p>Monitoring requirements</p> <p>a. Develop and implement a site-specific, BLM and USFWS-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on polar bears, and the subsistence use of this species.</p> <p>b. Provide trained, qualified, and BLM and USFWS-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan.</p> <p>c. For offshore activities, provide trained, qualified, and BLM and USFWS-approved observers on board all operational and support vessels to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan.</p> <p>d. Cooperate with the BLM and USFWS and other designated Federal, State, and local agencies to monitor the impacts of Industry activities on polar bears. Where information is insufficient to evaluate the potential effects of activities on polar bears, and the subsistence use of this species, operators may be required to participate in joint monitoring and/or research efforts to address these information needs and ensure the least practicable impact to these resources.</p>

⁷Vibroseis is a truck-mounted system that uses a large oscillating mass to put a range of frequencies into the earth.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>seals would be reported to the BLM using a NMFS-approved observation form.</p> <p>c. Ice paths must not be greater than 12 feet wide. No driving beyond the shoulder of the ice path or off planned routes unless necessary to avoid ungrounded ice or for other human or marine mammal safety reasons. On-ice driving routes should minimize travel over snow/ice/topographical features that lead to birthing lair development.</p> <p>d. No unnecessary equipment or operations (e.g., camps) would be placed or used on sea ice.</p>	<p>(see above)</p>	<p>Reporting requirements</p> <p>Operators must report the results of monitoring and mitigation activities to the BLM and USFWS.</p> <p>a. In-season monitoring reports</p> <ul style="list-style-type: none"> i. Activity progress reports. Notify the BLM and USFWS at least 48 hours prior to the onset of activities; provide the BLM and USFWS weekly progress reports of any significant changes in activities and/or locations; and notify the BLM and USFWS within 48 hours after ending of activities. ii. Polar bear observation reports. Report all observations of polar bears and potential polar bear dens, during any Industry activity. Information in the observation report must include, but is not limited to: (1) Date, time, and location of observation; (2) Number of bears; (3) Sex and age; (4) Observer name and contact information; (5) Weather, visibility, sea state, and sea-ice conditions at the time of observation; (6) Estimated closest distance of bears from personnel and facilities; (7) Industry activity at time of sighting; (8) Possible attractants present; (9) Bear behavior; (10) Description of the encounter; (11) Duration of the encounter; and (12) Mitigation actions taken. <p>b. Incident report. Report all bear incidents during any Industry activity. Reports must include: (1) All information specified for an observation report; (2) A complete detailed description of the incident; and (3) Any other actions taken.</p> <p>c. Final report. The results of monitoring and mitigation efforts identified in the marine mammal monitoring and mitigation plan must be submitted to the BLM and USFWS for review within 90 days of the expiration of an authorization. Information in the final report must include: (1) Copies of all observation reports submitted under an authorization; (2) A summary of the observation reports; (3) A summary of monitoring and mitigation efforts, including areas, total hours, total distances, and distribution; (4) Analysis of factors affecting the visibility and detectability of polar bears during monitoring; (5) Analysis of the effectiveness of mitigation measures; (6) Analysis of the distribution, abundance, and behavior of polar bears observed; and (7) Estimates of take in relation to the specified activities.</p> <p>In order to limit disturbance of activities to seal lairs in the nearshore area (<3 m water depth):</p> <p>Specific to seismic operations:</p> <p>a. Before the seismic survey begins, the operator would conduct a sound source verification test to measure the distance of vibroseis sound levels through grounded ice to the 120 dB re 1 µPa threshold in open water and water within ungrounded ice. Once that distance is determined, it would be shared with the BLM and NMFS. The distance would be used to buffer all on-ice seismic survey activity operations from any open water or ungrounded ice throughout the project area. The operator would draft a formal study proposal that would be submitted to the BLM and NMFS for review and approval before the activity begins.</p>	<p>Reporting requirements</p> <p>Operators must report the results of monitoring and mitigation activities to the BLM and USFWS.</p> <p>a. In-season monitoring reports</p> <ul style="list-style-type: none"> i. Activity progress reports. Notify the BLM and USFWS at least 48 hours prior to the onset of activities; provide the BLM and USFWS weekly progress reports of any significant changes in activities and/or locations; and notify the BLM and USFWS within 48 hours after ending of activities. ii. Polar bear observation reports. Report all observations of polar bears and potential polar bear dens, during any Industry activity. Information in the observation report must include, but is not limited to: (1) Date, time, and location of observation; (2) Number of bears; (3) Sex and age; (4) Observer name and contact information; (5) Weather, visibility, sea state, and sea-ice conditions at the time of observation; (6) Estimated closest distance of bears from personnel and facilities; (7) Industry activity at time of sighting; (8) Possible attractants present; (9) Bear behavior; (10) Description of the encounter; (11) Duration of the encounter; and (12) Mitigation actions taken. <p>b. Incident report. Report all bear incidents during any Industry activity. Reports must include: (1) All information specified for an observation report; (2) A complete detailed description of the incident; and (3) Any other actions taken.</p> <p>c. Final report. The results of monitoring and mitigation efforts identified in the marine mammal monitoring and mitigation plan must be submitted to the BLM and USFWS for review within 90 days of project completion or, for multi-year activities, within 90 days of the end of each annual reporting period. Information in the final report must include: (1) Copies of all observation reports submitted under an authorization; (2) A summary of the observation reports; (3) A summary of monitoring and mitigation efforts, including areas, total hours, total distances, and distribution; (4) Analysis of factors affecting the visibility and detectability of polar bears during monitoring; (5) Analysis of the effectiveness of mitigation measures; (6) Analysis of the distribution, abundance, and behavior of polar bears observed; and (7) Estimates of “take” as defined by the MMPA and its implementing regulations.</p> <p>In order to limit disturbance of activities to seal lairs in the nearshore area (<3 m water depth):</p> <p>Specific to seismic operations:</p> <p>a. Before the seismic survey begins, the operator would conduct a sound source verification test to measure the distance of vibroseis sound levels through grounded ice to the 120 dB re 1 µPa threshold in open water and water within ungrounded ice. Once that distance is determined, it would be shared with the BLM and NMFS. The distance would be used to buffer all on-ice seismic survey activity operations from any open water or ungrounded ice throughout the project area. The operator would draft a formal study proposal that would be submitted to the BLM and NMFS for review and approval before the activity begins.</p> <p>b. Before the seismic survey begins, the operator would work closely with regulators to ensure that mitigation measures are developed that are consistent with the Marine Mammal Protection Act and agency marine mammal guidelines, and take into account practicability, site-specific information, and project activity details.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	<p>For all activities:</p> <ul style="list-style-type: none"> a. Maintain airborne sound levels of equipment below 100 dB re 20 µPa at 66 feet. If different equipment would be used than was originally proposed, the applicant must inform the BLM Authorized Officer and share sound levels and air and water attenuation information for the new equipment. b. On-ice operations after May 1 would employ a full-time trained PSO on vehicles to ensure all basking seals are avoided by vehicles by at least 500 feet and would ensure that all equipment with airborne noise levels above 100 dB re 20 µPa were operating at distances from observed seals that allowed for the attenuation of noise to levels below 100 dB. All sightings of seals would be reported to the BLM using a NMFS-approved observation form. c. Ice paths must not be greater than 12 feet wide. No driving beyond the shoulder of the ice path or off planned routes unless necessary to avoid ungrounded ice or for other human or marine mammal safety reasons. On-ice driving routes should minimize travel over snow/ice/topographical features that lead to birthing lair development. d. No unnecessary equipment or operations (e.g., camps) would be placed or used on sea ice 	<p>For all activities:</p> <ul style="list-style-type: none"> a. Maintain airborne sound levels of equipment below 100 dB re 20 µPa at 66 feet. If different equipment would be used than was originally proposed, the applicant must inform the BLM Authorized Officer and share sound levels and air and water attenuation information for the new equipment. b. On-ice operations after May 1 would employ a full-time trained PSO on vehicles to ensure all basking seals are avoided by vehicles by at least 500 feet and would ensure that all equipment with airborne noise levels above 100 dB re 20 µPa were operating at distances from observed seals that allowed for the attenuation of noise to levels below 100 dB. All sightings of seals would be reported to the BLM using a NMFS-approved observation form. c. Ice paths must not be greater than 12 feet wide. No driving beyond the shoulder of the ice path or off planned routes unless necessary to avoid ungrounded ice or for other human or marine mammal safety reasons. On-ice driving routes should minimize travel over snow/ice/topographical features that lead to birthing lair development. d. No unnecessary equipment or operations (e.g., camps) would be placed or used on sea ice.
<p>Required Operating Procedure 11</p> <p><u>Objective:</u> Protect stream banks and freshwater sources, minimize soils compaction and the breakage, abrasion, compaction, or displacement of vegetation.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Ground operation would be allowed when soil temperatures at 12 inches below the tundra surface (defined as the top of the organic layer) reaches 23 degrees Fahrenheit (°F) and snow depths are an average of 9 inches, or 3 inches over the highest tussocks. Ground operations would cease when the spring snowmelt begins. The dates would be determined by the BLM Authorized Officer. b. Low ground pressure vehicles used for off-road travel would be defined by the BLM Authorized Officer. These vehicles would be selected and operated in a manner that eliminates direct impacts on the tundra caused by shearing, scraping, or excessively compacting the tundra. Note: This provision does not include the use of heavy equipment required during ice road construction; however, heavy equipment would not be allowed on the tundra until conditions in “a,” above, are met. c. Bulldozing tundra mat and vegetation, trails, or seismic lines is prohibited. Clearing or smoothing drifted snow is allowed to the extent that the tundra mat is not disturbed. Only smooth pipe snow drags would be allowed for smoothing drifted snow. d. To reduce the possibility of excessive compaction, vehicle operators would avoid using the same routes for multiple trips, unless necessitated by serious safety or environmental concerns and approved by the BLM Authorized Officer. This provision does not apply to hardened snow trails or ice roads. e. Ice roads would be designed and located to avoid the most sensitive and easily damaged tundra types as much as 	<p>Required Operating Procedure 11</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Ground operation would be allowed when soil temperature at 12 inches below the tundra surface (defined as the top of the organic layer) reaches 23 °F and snow depth and density amounts to no less than a snow water equivalent of 3 inches over the highest tussocks. Ground operations would cease when the spring snowmelt begins (approximately May 5 in the foothills, where elevations reach or exceed 500 feet, and approximately May 15 in the northern coastal areas). The exact dates would be determined by the BLM Authorized Officer. b. Low ground pressure vehicles used for off-road travel would be defined by the BLM Authorized Officer. These vehicles would be selected and operated in a manner that eliminates direct impacts on the tundra caused by shearing, scraping, or excessively compacting it. Note: This provision does not include the use of heavy equipment required during ice road construction; however, heavy equipment would not be allowed on the tundra until conditions in “a,” above, are met. c. Bulldozing tundra mat and vegetation, trails, or seismic lines is prohibited. Clearing or smoothing drifted snow is allowed, to the extent that the tundra mat is not disturbed. Only smooth pipe snow drags would be allowed for smoothing drifted snow. d. To reduce the possibility of excessive compaction, vehicle operators would avoid using the same routes for multiple trips unless necessitated by serious safety or environmental concerns and approved by the BLM Authorized Officer. This provision does not apply to hardened snow trails or ice roads. e. Ice roads would be designed and located to avoid the most sensitive and easily damaged tundra types as much as practicable. Ice roads may not use the same route each year; 	<p>Required Operating Procedure 11</p> <p><u>Objective:</u> Protect stream banks and freshwater sources, existing vegetations and hydrology, minimize soils compaction and the breakage, abrasion, compaction, or displacement of vegetation.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Ground operation would be allowed when soil temperature at 12 inches below the tundra surface (defined as the top of the organic layer) reaches 23 °F and 3 inches measured snow water equivalent (SWE). Ground operations would cease when the spring snowmelt begins (approximately May 5 in the foothills, where elevations reach or exceed 500 feet, and approximately May 15 in the northern coastal areas). The exact dates would be determined by the BLM Authorized Officer. FWS/BLM would release a weekly tundra travel report online. b. Low ground pressure vehicles used for off-road travel would be defined by the BLM Authorized Officer. These vehicles would be selected and operated in a manner that eliminates direct impacts on the tundra caused by shearing, scraping, or excessively compacting it. <i>Note: This provision does not include the use of heavy equipment required during ice road construction; however, heavy equipment would not be allowed on the tundra until conditions in “a,” above, are met.</i> c. Bulldozing tundra mat and vegetation, trails, or seismic lines is prohibited. Clearing or smoothing drifted snow is allowed, to the extent that the tundra mat is not disturbed. Only smooth pipe snow drags would be allowed for smoothing drifted snow. d. To reduce the possibility of excessive compaction, vehicle operators would avoid using the same routes and water crossings for multiple trips if excessive tundra disturbance is detected, or necessitated by serious safety or environmental concerns and approved by the BLM Authorized Officer. It may be environmentally preferred to use the same travel corridor in 	<p>Required Operating Procedure 11</p> <p><u>Objective:</u> Protect stream banks and freshwater sources, existing vegetations and hydrology, and polar bear denning habitat. Minimize soils compaction and the breakage, abrasion, compaction, or displacement of vegetation.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Ground operation would be allowed when soil temperature at 12 inches below the tundra surface (defined as the top of the organic layer) reaches 23 °F and 3 inches measured snow water equivalent (SWE). Ground operations would cease when the spring snowmelt begins (approximately May 5 in the foothills, where elevations reach or exceed 500 feet, and approximately May 15 in the northern coastal areas). The exact dates would be determined by the BLM Authorized Officer in coordination with the USFWS. USFWS/BLM would release a weekly tundra travel report online. b. Low ground pressure vehicles used for off-road travel would be defined by the BLM Authorized Officer in coordination with the USFWS. These vehicles would be selected and operated in a manner that eliminates direct impacts on the tundra caused by shearing, scraping, or excessively compacting it. <i>Note: This provision does not include the use of heavy equipment required during ice road construction; however, heavy equipment would not be allowed on the tundra until conditions in “a,” above, are met.</i> c. Bulldozing tundra mat and vegetation, trails, or seismic lines is prohibited. Clearing or smoothing drifted snow is allowed, to the extent that the tundra mat is not disturbed. Only smooth pipe snow drags would be allowed for smoothing drifted snow. d. To reduce the possibility of excessive compaction, local traditional knowledge holders would be consulted on the most practical sites for routes. Additionally, vehicle operators would avoid using the same routes and water crossings for multiple trips if excessive tundra disturbance is detected or necessitated by serious safety or environmental concerns and approved by the BLM Authorized

Alternative B	Alternative C	Alternative D	Alternative D2
<p>practicable. Ice roads may not use the same route each year; offsets may be required to avoid using the same route or track in subsequent years.</p> <p>f. Conventional ice road construction may not begin until off-road travel conditions are met (as described in "a," above) within the ice road route and approval to begin construction is given by the BLM Authorized Officer.</p> <p>g. Snow fences may be used in areas of low snow to increase snow depths within an ice road or snow trail route. Excess snow accumulated by snow fences must be excavated or pushed to decrease snow depths to that found in surrounding tundra at the end of road use.</p> <p>h. Seismic operations and winter overland travel may be monitored by agency representatives, and the operator may be required to accommodate the representative during operations.</p> <p>i. Incidents of damage to the tundra would be reported to the BLM Authorized Officer within 72 hours of occurrence. Follow-up corrective actions would be determined in consultation with and approved by the BLM Authorized Officer.</p>	<p>they would be offset to avoid portions of an ice road route from the previous 2 years.</p> <p>f. Conventional ice road construction may not begin until off-road travel conditions are met (as described in "a," above) within the ice road route and approval to begin construction is given by the BLM Authorized Officer.</p> <p>g. To minimize changes in snow distribution resulting from oil and gas activities that could affect bear denning habitat and water quality and quantity, snow fences may be used in areas of low snow to increase snow depths within an ice road or snow trail route, with the approval of the BLM Authorized Officer.</p> <p>h. Seismic operations and winter overland travel may be monitored by agency representatives, and the operator may be required to accommodate the representative during operations.</p> <p>i. Incidents of damage to the tundra would be reported to the BLM Authorized Officer within 72 hours of occurrence. Follow-up corrective actions would be determined in consultation with and approved by the BLM Authorized Officer and the USFWS.</p> <p>j. Provide the BLM with an as-built of all ice roads, snow trails, and ice pads after the infrastructure is completed. Data must be in the form of Environmental Systems Research Institute shapefiles referencing the North American Datum of 1983.</p>	<p>sequential years. This provision does not apply to hardened snow trails or ice roads.</p> <p>e. Ice roads and water crossings would be designed and located to avoid the most sensitive and easily damaged tundra types as much as practicable. Ice roads may not use the same route each year; offsets may be required to avoid using the same route or track in subsequent years.</p> <p>f. Conventional ice road construction may not begin until off-road travel conditions are met (as described in "a," above) within the ice road route and approval to begin construction is given by the BLM Authorized Officer.</p> <p>g. Seismic operations and winter overland travel may be monitored by agency representatives, and the operator may be required to accommodate the representative during operations.</p> <p>h. Incidents of damage to the tundra would be reported to the BLM Authorized Officer within 72 hours of occurrence using a standardized incident report form. Follow-up corrective actions would be determined in consultation with and approved by the BLM Authorized Officer and the USFWS.</p> <p>i. Provide the BLM with an as-built of all ice roads, snow trails, and ice pads after the infrastructure is completed. Data must be in the form of Environmental Systems Research Institute shapefiles referencing the North American Datum of 1983.</p>	<p>Officer in coordination with the USFWS. It may be environmentally preferred to use the same travel corridor in sequential years. This provision does not apply to hardened snow trails or ice roads.</p> <p>e. Ice roads and water crossings would be designed and located to avoid the most sensitive and easily damaged tundra types as much as practicable. Ice roads may not use the same route each year; offsets may be required to avoid using the same route or track in subsequent years.</p> <p>f. Conventional ice road construction may not begin until off-road travel conditions are met (as described in "a," above) within the ice road route and approval to begin construction is given by the BLM Authorized Officer in coordination with the USFWS.</p> <p>g. Seismic operations and winter overland travel may be monitored by agency representatives, and the operator may be required to accommodate the representative during operations.</p> <p>h. Incidents of damage to the tundra would be reported to the BLM Authorized Officer within 72 hours of occurrence using a standardized incident report form. Follow-up corrective actions would be determined in consultation with and approved by the BLM Authorized Officer in coordination with the USFWS.</p> <p>i. Provide the BLM with an as-built of all ice roads, snow trails, and ice pads after the infrastructure is completed. Data must be in the form of Environmental Systems Research Institute shapefiles referencing the North American Datum of 1983.</p>
<p>Required Operating Procedure 12</p> <p><u>Objective:</u> Maintain natural spring (breakup) runoff patterns and fish passage, minimize flooding from human-made obstructions, prevent streambed sedimentation and scour, and protect water quality and stream banks.</p> <p><u>Requirement/Standard:</u> No similar requirements</p>	<p>Required Operating Procedure 12</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>a. The permittee shall provide the BLM any ice thickness and water depth data collected at ice road or snow trail stream crossings during the pioneering stage of road/trail construction.</p> <p>b. At the end of operations in spring, the permittee must provide the BLM with photographs of all stream crossings that have been removed, breached, or slotted.</p>	<p>Required Operating Procedure 12</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>a. Crossing of waterway courses shall be made using a low-angle approach. Crossings that are reinforced with additional snow or ice ("bridges") shall be removed, breached, or slotted before spring breakup. Ramps shall be removed to the extent possible without damaging stream banks. Ramps and bridges shall be substantially free of soil and debris.</p> <p>b. The permittee shall provide the BLM with any ice thickness and water depth data collected at ice road or snow trail stream crossings during the pioneering stage of road/trail construction.</p> <p>c. At the end of operations in spring, the permittee must provide the BLM with photographs of all stream crossings that have been removed, breached, or slotted.</p>	<p>Required Operating Procedure 12</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>a. Crossing of waterway courses shall be made using a low-angle approach. Crossings that are reinforced with additional snow or ice ("bridges") shall be removed, breached, or slotted before spring breakup. Ramps shall be removed to the extent possible without damaging stream banks. Ramps and bridges shall be substantially free of soil and debris.</p> <p>b. The permittee shall provide the BLM with any ice thickness and water depth data collected at ice road or snow trail stream crossings during the pioneering stage of road/trail construction.</p> <p>c. The permittee shall conduct on-site monitoring of streamflow prior to installing ice or snow bridge to determine the site-specific natural flow regime during the spring.</p> <p>d. At the end of operations in spring, the permittee must provide the BLM with photographs of all stream crossings that have been removed, breached, or slotted.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 13</p> <p><u>Objective:</u> Avoid additional freeze-down of aquatic habitat harboring overwintering fish and aquatic invertebrates that fish prey on.</p> <p><u>Requirement/Standard:</u> Travel up and down streambeds is prohibited unless it can be demonstrated that there would be no additional impacts from such travel on overwintering fish, the aquatic invertebrates they prey on, and water quality. Rivers, streams, and lakes would be crossed at areas of grounded ice or with the approval of the BLM Authorized Officer and when it has been demonstrated that no additional impacts would occur on fish or aquatic invertebrates.</p>	<p>Required Operating Procedure 13</p> <p><u>Objective:</u> Same as Alternative B.</p>	<p>Required Operating Procedure 13</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Construction of the primary ice road or snow trail route along streambeds without grounded ice is prohibited unless it can be demonstrated (by collection of ice thickness and liquid water depths) that there will be no additional impacts from such travel to over-wintering fish. Rivers, streams, and lakes shall be crossed at areas of grounded ice whenever possible.</p> <p>Some travel up and down streambeds would be allowed by the individual vehicles collecting snow from river drifts or ice aggregate from the channel (where snow is less than 4 feet deep).</p>	<p>Required Operating Procedure 13</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> BLM Authorized Officers, in coordination with the USFWS and in consultation with local traditional knowledge holders, must approve construction of the primary ice road or snow trail route along streambeds without grounded ice is prohibited unless it can be demonstrated (by collection of ice thickness and liquid water depths) that there will be no additional impacts from such travel to over-wintering fish. Rivers, streams, and lakes shall be crossed at areas of grounded ice whenever possible.</p> <p>Some travel up and down streambeds would be allowed by the individual vehicles collecting snow from river drifts or ice aggregate from the channel (where snow is less than 4 feet deep).</p>
<p>Required Operating Procedure 14</p> <p><u>Objective:</u> Minimize the effects of high-intensity acoustic energy from seismic surveys on fish.</p> <p><u>Requirement/Standard:</u> When conducting vibroseis-based surveys above potential fish overwintering areas (water 6 feet deep or greater, ice plus liquid depth), lessees/operators/contractors would follow recommendations by Morris and Winters (2005): only a single set of vibroseis shots would be conducted if possible; if multiple shot locations are required, these would be conducted with minimal delay; multiple days of vibroseis activity above the same overwintering area would be avoided, if possible.</p>	<p>Required Operating Procedure 14</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Seismic surveys would not be conducted over unfrozen water with fish overwintering potential.</p>	<p>Required Operating Procedure 14</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Seismic surveys would not be conducted over unfrozen water with fish overwintering potential (water 6 feet deep or greater, ice plus liquid depth). Proposed actions should include local traditional knowledge, when available, to help define potential overwintering areas.</p>	<p>Required Operating Procedure 14</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Seismic surveys would not be conducted over unfrozen water with fish overwintering potential (water 6 feet deep or greater, ice plus liquid depth). Proposed actions should include local traditional knowledge, when available, to help define potential overwintering areas.</p>
<p>Required Operating Procedure 15</p> <p><u>Objective:</u> Reduce changes in snow distribution associated with the use of snow fences to protect water quantity and wildlife habitat, including snow drifts used by denning polar bears.</p> <p><u>Requirement/Standard:</u> The use of snow fences to reduce or increase snow depth requires permitting by the BLM Authorized Officer.</p>	<p>Required Operating Procedure 15</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 15</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 15</p> <p><u>Objective:</u> Reduce changes in snow distribution associated with the use of snow fences to protect water quantity and wildlife habitat, including snow drifts used by denning polar bears.</p> <p><u>Requirement/Standard:</u> The use of snow fences to reduce or increase snow depth requires permitting by the BLM Authorized Officer in coordination with USFWS. Snow fences shall not be sited within 5 miles of the coast.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
OIL AND GAS EXPLORATORY DRILLING			
<p>Required Operating Procedure 16</p> <p><u>Objective:</u> Protect water quality in fish-bearing water bodies and minimize alteration of riparian habitat.</p> <p><u>Requirement/Standard:</u> Exploratory drilling is prohibited in fish-bearing rivers and streams and other fish-bearing water bodies. On a case-by-case basis, the BLM Authorized Officer may consider exploratory drilling in floodplains of fish-bearing rivers and streams.</p>	<p>Required Operating Procedure 16</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 16</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Exploratory drilling is prohibited in fish-bearing rivers and streams and other fish-bearing water bodies. On a case-by-case basis, the BLM Authorized Officer may consider exploratory drilling in floodplains of rivers and streams that do not support resident, anadromous, or endemic fish populations.</p>	<p>Required Operating Procedure 16</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Exploratory drilling is prohibited in fish-bearing rivers and streams and other aquatic habitats with confirmed fish presence and the habitats connected by perennial or temporary aquatic water to locations with confirmed fish presence. On a case-by-case basis, the BLM Authorized Officer in coordination with the USFWS may consider exploratory drilling in floodplains of rivers and streams that do not support resident, anadromous, or endemic fish populations.</p>
<p>Required Operating Procedure 17</p> <p><u>Objective:</u> Minimize surface impacts from exploratory drilling.</p> <p><u>Requirement/Standard:</u> Construction of gravel roads would be prohibited for exploratory drilling. Use of a previously constructed road or pad may be permitted if it is environmentally preferred.</p>	<p>Required Operating Procedure 17</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 17</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Construction of gravel roads and pads would be prohibited for exploratory drilling. Use of a previously constructed road or pad may be permitted if it is environmentally preferred.</p>	<p>Required Operating Procedure 17</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Construction of gravel roads and pads would be prohibited for exploratory drilling. Use of a previously constructed road or pad may be permitted if it is environmentally preferred.</p>
FACILITY DESIGN AND CONSTRUCTION			
<p>Required Operating Procedure 18</p> <p><u>Objective:</u> Protect subsistence use and access to subsistence hunting and fishing areas.</p> <p><u>Requirement/Standard:</u> All roads must be designed, constructed, maintained, and operated to create minimal environmental impacts and to avoid or minimize impacts on subsistence use and access to subsistence hunting and fishing areas. The BLM Authorized Officer would consult with appropriate entities before approving construction of roads. Subject to approval by the BLM Authorized Officer, the construction, operation, and maintenance of oil and gas field roads is the responsibility of the lessee/operator/contractor, unless the construction, operation, and maintenance of roads are assumed by the appropriate governing entity.</p> <p>BLM will consult with Tribal Governments on road design, construction, and use to avoid and minimize environmental and subsistence impacts.</p>	<p>Required Operating Procedure 18</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 18</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> All roads (snow, ice, or gravel) must be designed, constructed, maintained, and operated to create minimal environmental impacts and to avoid or minimize impacts on subsistence use and access to subsistence hunting and fishing areas. The BLM Authorized Officer would consult with appropriate entities before approving construction of roads. Subject to approval by the BLM Authorized Officer, the construction, operation, and maintenance of oil and gas field roads would be the responsibility of the lessee/operator/contractor, unless the construction, operation, and maintenance of roads are assumed by the appropriate governing entity.</p> <p>BLM will consult with Tribal Governments on road design, construction, and use to avoid and minimize environmental and subsistence impacts.</p>	<p>Required Operating Procedure 18</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> All roads (snow, ice, or gravel) must be designed, constructed, maintained, and operated to create minimal environmental impacts and to avoid or minimize impacts on subsistence use and access to subsistence hunting and fishing areas. The BLM Authorized Officer in coordination with the USFWS would consult with appropriate entities before approving construction of roads. Subject to approval by the BLM Authorized Officer, the construction, operation, and maintenance of oil and gas field roads would be the responsibility of the lessee/operator/contractor, unless the construction, operation, and maintenance of roads are assumed by the appropriate governing entity.</p> <p>BLM will consult with Tribal Governments on road design, construction, and use to avoid and minimize environmental and subsistence impacts.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 19</p> <p><u>Objective:</u> Protect water quality and the diversity of fish, aquatic invertebrates, and wildlife populations and habitats.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Permanent oil and gas facilities, including roads, airstrips, and pipelines, are prohibited within 500 feet, as measured from the ordinary high-water mark, of fish-bearing water bodies, unless further setbacks are stipulated under Lease Stipulations 1, 2, or 3. Pipeline and road crossings would be permitted by the BLM Authorized Officer in accordance with PL 115-97, following coordination with the appropriate entities. b. Temporary winter exploration and construction camps are prohibited on frozen lakes and river ice. c. Siting temporary winter exploration and construction camps on river sand and gravel bars is allowed and encouraged. Where trailers or modules must be leveled and the surface is vegetation, they would be leveled using blocking in a way that preserves the vegetation. 	<p>Required Operating Procedure 19</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 19</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Permanent oil and gas facilities, including roads, airstrips, and pipelines, are prohibited within 500 feet, as measured from the active floodplain of any waterbody, unless further setbacks are stipulated under Lease Stipulations 1, 2, or 3. Essential pipeline and road crossings in setback areas outlined in Lease Stipulation 3 would be prohibited. Essential pipeline and road crossings would be permitted by the BLM Authorized Officer in accordance with PL 115-97 in setback areas outlined in Lease Stipulations 1 and 2, following coordination with the appropriate entities. b. Temporary winter exploration and construction camps are prohibited on frozen lakes and river ice. c. Siting temporary winter exploration and construction camps on river sand and gravel bars is allowed. Where trailers or modules must be leveled and the surface is vegetation, they would be leveled using blocking in a way that preserves the vegetation. 	<p>Required Operating Procedure 19</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Permanent oil and gas facilities, including roads, airstrips, and pipelines, are prohibited within 500 feet, as measured from the active floodplain of any waterbody, unless further setbacks are stipulated under Lease Stipulations 1, 2, or 3. Essential pipeline and road crossings in setback areas outlined in Lease Stipulation 3 would be prohibited. Essential pipeline and road crossings would be permitted by the BLM Authorized Officer in coordination with the USFWS and in consultation with local traditional knowledge holders, and in accordance with PL 115-97 in setback areas outlined in Lease Stipulations 1 and 2, following coordination with the appropriate entities. b. Temporary winter exploration and construction camps are prohibited on frozen lakes and river ice. c. Siting temporary winter exploration and construction camps on river sand and gravel bars is allowed. Where trailers or modules must be leveled and the surface is vegetation, they would be leveled using blocking in a way that preserves the vegetation.
<p>Required Operating Procedure 20</p> <p><u>Objective:</u> Maintain free passage of marine, estuarine, and freshwater fish species, protect subsistence use and access to subsistence hunting and fishing and anadromous fish, and protect subsistence use and access to subsistence and non-subsistence hunting and fishing.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Causeways and docks are prohibited in river mouths and deltas. Artificial gravel islands and permanent bottom-founded structures are prohibited in river mouths and active stream channels on river deltas. b. Causeways, docks, artificial islands, and bottom-founded drilling structures would be designed to ensure free passage of marine and anadromous fish and to prevent significant changes to nearshore oceanographic circulation patterns and water quality characteristics. A monitoring program, developed in coordination with appropriate entities (e.g., USFWS, NMFS, State of Alaska, or NSB or local traditional knowledge holders), would be required to address the objectives of water quality and free passage of fish. 	<p>Required Operating Procedure 20</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 20</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 20</p> <p>Same as Alternative B.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 21</p> <p><u>Objective:</u> Minimize impacts of the development footprint.</p> <p><u>Requirement/Standard:</u> Facilities would be designed and located to minimize the development footprint and impacts on other purposes of the Arctic Refuge. Issues and methods that are required include:</p> <ul style="list-style-type: none"> a. Using extended-reach drilling for production drilling to minimize the number of pads and the network of roads between pads b. Sharing facilities with existing development c. Collocating all oil and gas facilities with drill pads, except airstrips, docks, base camps, and seawater treatment plants (STPs) d. Using gravel-reduction technologies, e.g., insulated or pile-supported pads e. Using approved impermeable liners under gravel infrastructure to minimize the potential for hydrocarbon and other hazardous materials spills to migrate to underlying ground. f. Harvesting the tundra organic layer within gravel pad footprints for use in rehabilitation g. Coordinating facilities with infrastructure in support of adjacent development h. Locating facilities and other infrastructure outside areas identified as important for wildlife habitat, subsistence uses, and recreation i. Where aircraft traffic is a concern, balancing gravel pad size and available supply storage capacity with potential reductions in the use of aircraft to support oil and gas operations j. Facilities and infrastructure will be designed to minimize alteration of sheetflow/overland flow k. Where gravel is brought in from outside of the Coastal Plain, require the use of Certified Weed-Free Gravel 	<p>Required Operating Procedure 21</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 21</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Permanent facilities would be designed and located to minimize the development footprint and impacts on other purposes of the Arctic Refuge. Issues and methods that are required include:</p> <ul style="list-style-type: none"> a. Using extended-reach drilling for production drilling to minimize the number of pads and the network of roads between pads b. Sharing facilities with existing development c. Collocating all oil and gas facilities with drill pads, except airstrips, docks, base camps, and seawater treatment plants (STPs) d. Using gravel-reduction technologies, e.g., insulated or pile-supported pads e. Using approved impermeable liners under gravel infrastructure to minimize the potential for hydrocarbon and other hazardous materials spills to migrate to underlying ground. f. Harvesting and properly maintaining the tundra organic layer within gravel pad footprints for use in rehabilitation g. Coordinating facilities with infrastructure in support of adjacent development h. Locating facilities and other infrastructure outside areas identified as important for wildlife habitat, subsistence uses, and recreation at distances needed to protect from disturbance. i. Where aircraft traffic is a concern, balancing gravel pad size and available supply storage capacity with potential reductions in the use of aircraft to support oil and gas operations j. Facilities and infrastructure will be designed to minimize alteration of sheetflow/overland flow. k. Where gravel is brought in from outside of the Coastal Plain, require the use of Certified Weed-Free Gravel l. Avoid road construction for the sole purpose of ensuring pipeline integrity or other types of monitoring (e.g., lakes, air quality), to the greatest extent practical. m. Minimize acreage in each constructed pond 	<p>Required Operating Procedure 21</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Permanent facilities would be designed and located to minimize the development footprint and impacts on other purposes of the Arctic Refuge. Issues and methods that are required include:</p> <ul style="list-style-type: none"> a. Using extended-reach drilling for production drilling to minimize the number of pads and the network of roads between pads b. Sharing facilities with existing development c. Collocating all oil and gas facilities with drill pads, except airstrips, docks, base camps, and seawater treatment plants (STPs) d. Using gravel-reduction technologies, e.g., insulated or pile-supported pads e. Using approved impermeable liners under gravel infrastructure to minimize the potential for hydrocarbon and other hazardous materials spills to migrate to underlying ground. f. Harvesting and properly maintaining the tundra organic layer within gravel pad footprints for use in rehabilitation g. Coordinating facilities with infrastructure in support of adjacent development h. Locating facilities and other infrastructure outside areas identified as important for wildlife habitat, subsistence uses, and recreation at distances needed to protect from disturbance. i. Where aircraft traffic is a concern, balancing gravel pad size and available supply storage capacity with potential reductions in the use of aircraft to support oil and gas operations j. Facilities and infrastructure will be designed to minimize alteration of sheetflow/overland flow. k. Where gravel is brought in from outside of the Coastal Plain, require the use of Certified Weed-Free Gravel l. Avoid road construction for the sole purpose of ensuring pipeline integrity or other types of monitoring (e.g., lakes, air quality), to the greatest extent practical. m. Minimize acreage in each constructed pond.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 22</p> <p><u>Objective:</u> Reduce the potential for ice-jam flooding, damage from aufeis, impacts on wetlands and floodplains, erosion, alteration of natural drainage patterns, and restriction of fish passage.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. To allow for sheet flow and floodplain dynamics and to ensure passage of fish and other organisms, single-span bridges are preferred over culverts, if technically feasible. When necessary, culverts could be constructed on smaller streams, if they are large enough to avoid restricting fish passage or adversely affecting natural stream flow. b. To ensure that crossings provide for fish passage, all proposed crossing designs would adhere to the Best Management Practices (BMPs) outlined in Fish Passage Design Guidelines, developed by the USFWS Alaska Fish Passage Program, McDonald & Associates (1994), Stream Simulation: An Ecological Approach to Providing Passage for Aquatic Organisms at Road-Stream Crossings (USFS 2008), and other generally accepted best management procedures prescribed by the BLM Authorized Officer, in consultation with the USFWS. c. In addition to the BMPs outlined in the aforementioned documents for stream simulation design, the design engineer would ensure that crossing structures are designed for aufeis, permafrost, sheet flow, additional freeboard during breakup, and other unique conditions of the arctic environment. 	<p>Required Operating Procedure 22</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 22</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. To allow for sheet flow and floodplain dynamics and to ensure passage of fish and other organisms, single-span bridges are preferred over culverts, if technically feasible. When necessary, culverts could be constructed on smaller streams, if they are large enough to avoid restricting fish passage or adversely affecting natural stream flow. b. The BLM would require fish sampling at any stream crossing where flow is channelized. The permittee would be required to gather these data, or this requirement may be waived if an acceptable dataset already exists and is approved by the BLM Authorized Officer. Alternatively, the permittee may assume fish presence and design accordingly. c. A minimum of one year of hydrologic data (i.e., permanent stage data and discharge measurements) must be collected at stream and marsh crossings. Additional years of hydrologic data collection may be required if further information is needed to inform the crossing structure design. d. To ensure that crossings provide for fish passage, all proposed crossing designs would adhere to the Best Management Practices (BMPs) outlined in Fish Passage Design Guidelines, developed by the USFWS Alaska Fish Passage Program, USFWS Culvert Design Guidelines for Ecological Function (USFWS 2020), McDonald & Associates (1994), Stream Simulation: An Ecological Approach to Providing Passage for Aquatic Organisms at Road-Stream Crossings (USFS 2008), and other generally accepted best management procedures prescribed by the BLM Authorized Officer, in consultation with the USFWS. When available, crossing design and construction would include local traditional knowledge of fish, erosion, natural drainage, ice-jamming, aufeis, wetlands, floodplains, and stream flow. e. To maintain natural flow regimes, construction of in-river training structures would be prohibited in rivers that support resident, anadromous, or endemic fish populations. f. In addition to the BMPs outlined in the aforementioned documents for stream simulation design, the design engineer would ensure that crossing structures are designed for aufeis, permafrost, sheet flow, additional freeboard during breakup, and other unique conditions of the arctic environment. g. All roads and crossing structures must be maintained in a manner that prevents off road disturbance 	<p>Required Operating Procedure 22</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. To allow for sheet flow and floodplain dynamics and to ensure passage of fish and other organisms, single-span bridges are preferred over culverts, if technically feasible. When necessary, culverts could be constructed on smaller streams, if they are large enough to avoid restricting fish passage or adversely affecting natural stream flow. b. The BLM would require fish sampling at any stream crossing where flow is channelized. The permittee would be required to gather these data, or this requirement may be waived if an acceptable dataset already exists and is approved by the BLM Authorized Officer in coordination with the USFWS and local traditional knowledge holders. Alternatively, the permittee may assume fish presence and design accordingly. c. A minimum of one year of hydrologic data (i.e., permanent stage data and discharge measurements) must be collected at stream and marsh crossings. Additional years of hydrologic data collection may be required if further information is needed to inform the crossing structure design. d. To ensure that crossings provide for fish passage, all proposed crossing designs would adhere to the Best Management Practices (BMPs) outlined in Fish Passage Design Guidelines, developed by the USFWS Alaska Fish Passage Program, USFWS Culvert Design Guidelines for Ecological Function (USFWS 2020), McDonald & Associates (1994), Stream Simulation: An Ecological Approach to Providing Passage for Aquatic Organisms at Road-Stream Crossings (USFS 2008), and other generally accepted best management procedures prescribed by the BLM Authorized Officer, in coordination with the USFWS and local traditional knowledge holders. When available, crossing design and construction would include local traditional knowledge of fish, erosion, natural drainage, ice-jamming, aufeis, wetlands, floodplains, and stream flow. e. To maintain natural flow regimes, construction of in-river training structures would be prohibited in rivers that support resident, anadromous, or endemic fish populations. f. In addition to the BMPs outlined in the aforementioned documents for stream simulation design, the design engineer would ensure that crossing structures are designed for aufeis, permafrost, sheet flow, additional freeboard during breakup, and other unique conditions of the arctic environment. g. All roads and crossing structures must be maintained in a manner that prevents off road disturbance.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 23</p> <p><u>Objective:</u> Minimize disruption of caribou movement and subsistence use.</p> <p><u>Requirement/Standard:</u> Pipelines and roads would be designed to allow the free movement of caribou and the safe, unimpeded passage of those participating in subsistence activities. Listed below are the accepted design practices.</p> <ol style="list-style-type: none"> Aboveground pipelines would be elevated a minimum of 7 feet, as measured from the ground to the bottom of the pipeline at vertical support members (VSMs). In areas where facilities or terrain would funnel caribou movement or impede subsistence or public access, ramps of appropriate angle and design over pipelines, buried pipelines, or pipelines buried under roads may be required by the BLM Authorized Officer, in coordination with the appropriate entity. A minimum distance of 500 feet between pipelines and roads would be maintained. Where it is not feasible, alternative pipeline routes, designs, and possible burial under the road for pipeline road crossings would be considered by the BLM Authorized Officer. Aboveground pipelines would have a nonreflective finish. When laying out oil and gas field developments, lessees would orient infrastructure to avoid impeding caribou migration and to avoid corralling effects. Before the construction of permanent facilities is authorized, the lessee would design and implement and report a study of caribou movement, unless an acceptable study specific to the PCH and CAH has been completed within the last 10 years and approved by the BLM Authorized Officer. A vehicle use management plan would be developed by the lessee/operator/contractor and approved by the BLM Authorized Officer, in consultation with the appropriate federal, State, and NSB regulatory and resource agencies. The management plan would minimize or mitigate displacement during calving and would avoid, to the extent feasible, delays to caribou movements and vehicle collisions during the midsummer insect season, with traffic management following industry practices. By direction of the BLM Authorized Officer, traffic may be stopped throughout a defined area for up to 4 weeks, to prevent displacement of calving caribou. If required, a monitoring plan could include collection of data on vehicle counts and caribou interaction. 	<p>Required Operating Procedure 23</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 23</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Pipelines and roads will be designed to allow the free movement and habitat use of caribou and the safe, unimpeded passage of those participating in subsistence activities. Listed below are the accepted design practices.</p> <ol style="list-style-type: none"> Aboveground pipelines would be elevated a minimum of 7 feet, as measured from the top of the tussocks to the bottom of the pipeline at vertical support members (VSMs). In areas where facilities or terrain would funnel caribou movement or impede subsistence or public access, ramps of appropriate angle and design over pipelines, buried pipelines, or pipelines buried under roads may be required by the BLM Authorized Officer and USFWS, in coordination with Tribal Governments. Include extra measures to prevent external corrosion at these locations. A minimum distance of 500 feet between pipelines and roads would be maintained. Where it is not feasible, alternative pipeline routes, designs, and possible burial under the road for pipeline road crossings would be considered by the BLM Authorized Officer and USFWS, in coordination with Tribal Governments. Aboveground pipelines would have a nonreflective finish. When laying out oil and gas field developments, lessees would orient infrastructure to avoid impeding caribou migration and to avoid corralling effects. Before the construction of permanent facilities is authorized, the lessee would provide funding to USFWS to design and carry out a study of caribou movement and spatial use. The lessee/operator/contractor would develop an Adaptive Research and Management Plan (ARMP) to identify research needs, carry out monitoring and research, evaluate existing/ongoing management and mitigation efforts, quantify impacts, and identify management changes when necessary. This plan will be submitted to USFWS, BLM, and the International Porcupine Caribou Herd Technical Committee for review and approval. The lessee will provide adequate funds to implement this monitoring program. BLM/USFWS will hire a consulting company to carry out this monitoring program (see ROP 23.1). Facilities will be sited to avoid local traditional caribou harvesting areas through coordination with Tribal Governments. Where avoidance of traditional harvesting areas is not possible, agencies, companies, and harvesters will negotiate a compensation agreement to acknowledge loss of harvest opportunities as a result of lack of traditional access. In recognition of the uncertainty around the formation, movements, and dispersion of large aggregations (>5,000) of caribou, satellite location data would be evaluated daily by the Porcupine Caribou Technical Committee and Canadian agency counterparts who monitor PCH movements and locations. If a large aggregation of caribou is within 30 km of any infrastructure, associated activity related to identified infrastructure would be subject to the provisions of the Emergency Closure Plans (see ROP 23.1). 	<p>Required Operating Procedure 23</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Pipelines and roads will be designed to allow the free movement and habitat use of caribou and the safe, unimpeded passage of those participating in subsistence activities. Listed below are the accepted design practices.</p> <ol style="list-style-type: none"> Aboveground pipelines would be elevated a minimum of 7 feet, as measured from the top of the tussocks to the bottom of the pipeline at vertical support members (VSMs). In areas where facilities or terrain would funnel caribou movement or impede subsistence or public access, ramps of appropriate angle and design over pipelines, buried pipelines, or pipelines buried under roads may be required by the BLM Authorized Officer in coordination with the USFWS and Tribal Governments. Include extra measures to prevent external corrosion at these locations. A minimum distance of 500 feet between pipelines and roads would be maintained. Where it is not feasible, alternative pipeline routes, designs, and possible burial under the road for pipeline road crossings would be considered by the BLM Authorized Officer in coordination with the USFWS and Tribal Governments. Aboveground pipelines would have a nonreflective finish. When laying out oil and gas field developments, lessees would orient infrastructure to avoid impeding caribou migration and to avoid corralling effects. Before the construction of permanent facilities is authorized, the lessee would provide funding to USFWS to design and carry out a study of caribou movement and spatial use. The lessee/operator/contractor would develop an Adaptive Research and Management Plan (ARMP) to identify research needs, carry out monitoring and research, evaluate existing/ongoing management and mitigation efforts, quantify impacts, and identify management changes when necessary. This plan will be submitted to USFWS, BLM, and the International Porcupine Caribou Herd Technical Committee for review and approval. The lessee will provide adequate funds to implement this monitoring program. BLM/USFWS will hire a consulting company to carry out this monitoring program (see ROP 23.1). Facilities will be sited to avoid local traditional caribou harvesting areas through coordination with Tribal Governments. Where avoidance of traditional harvesting areas is not possible, agencies, companies, and harvesters will negotiate a compensation agreement to acknowledge loss of harvest opportunities as a result of lack of traditional access. In recognition of the uncertainty around the formation, movements, and dispersion of large aggregations (>5,000) of caribou, satellite location data would be evaluated daily by the Porcupine Caribou Technical Committee and Canadian agency counterparts who monitor PCH movements and locations. If a large aggregation of caribou is within 30 km of any infrastructure, associated activity related to identified infrastructure would be subject to the provisions of the Emergency Closure Plans (see ROP 23.1).

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	<p>i. A vehicle use management plan would be developed by the lessee/operator/contractor and approved by the BLM Authorized Officer, USFWS, in consultation with Tribal Governments, the appropriate federal, State, and NSB regulatory and resource agencies. The management plan would minimize or mitigate displacement during calving, post-calving and insect-relief periods and would avoid disruptions to caribou movements and vehicle collisions. By direction of the BLM Authorized Officer and USFWS, traffic may be stopped throughout a defined area for up to 4 weeks, to prevent displacement of caribou. The monitoring plan will include collection of data on vehicle traffic (counts, times, speed, etc.) and caribou interaction.</p> <p>j. Lessee/operator/contractor will study and produce a report in coordination with BLM, USFWS, and Tribal Governments on Gwich'in and Iñupiaq knowledge of road and pipeline impacts to caribou movement and subsistence use. BLM, USFWS, and Tribal Governments must review and approve this report prior to road and pipeline construction to inform best design practices.</p>	<p>i. A vehicle use management plan would be developed by the lessee/operator/contractor and approved by the BLM Authorized Officer, in coordination with the USFWS, consultation with Tribal Governments, the appropriate federal, State, and NSB regulatory and resource agencies. The management plan would minimize or mitigate displacement during calving, post-calving and insect-relief periods and would avoid disruptions to caribou movements and vehicle collisions. By direction of the BLM Authorized Officer in coordination with the USFWS, traffic may be stopped throughout a defined area whenever necessary to prevent displacement of caribou. The monitoring plan will include collection of data on vehicle traffic (counts, times, speed, etc.) and caribou interaction.</p> <p>j. Lessee/operator/contractor will study and produce a report in coordination with BLM, USFWS, and Tribal Governments on Gwich'in and Iñupiaq knowledge of road and pipeline impacts to caribou movement and subsistence use. BLM, USFWS, and Tribal Governments must review and approve this report prior to road and pipeline construction to inform best design practices.</p>
<p>Required Operating Procedure 23.1</p> <p>No similar objective or requirement/ standard.</p>	<p>Required Operating Procedure 23.1</p> <p>No similar objective or requirement/standard.</p>	<p>Required Operating Procedure 23.1</p> <p><u>Objective:</u> To ensure monitoring and research in place to implement a caribou Adaptive Research and Management Plan (ARMP).</p> <p><u>Requirement/Standard:</u></p> <p>The lessee/operator/contractor would develop an ARMP to identify research needs, evaluate existing/ongoing management and mitigation efforts, quantify impacts, and identify management changes when necessary. This plan would be submitted to USFWS, BLM, and the International Porcupine Caribou Herd Technical Committee (PCTC) for review and approval. The lessee would provide adequate funds to implement this monitoring program. BLM and USFWS would hire an organization or agency to carry out this monitoring program. The ARMP would be initiated after leasing and before the facility planning stage and will include but not be limited to:</p> <p>a. Formation of an ARMP Steering Committee, including staff from the BLM, USFWS, the PCTC, and Tribal representatives, to oversee the ARMP and its implementation,</p> <p style="padding-left: 20px;">i. The PCTC would prioritize projects that address research questions,</p> <p>b. Development of an ARMP monitoring program with full industry engagement,</p> <p>c. Development of an accessible and comprehensive data repository,</p> <p>d. Annual monitoring and evaluation program,</p> <p>e. In consultation with BLM, USFWS, the PCTC, industry representatives, and Tribal Governments, develop, standardize, and modify as necessary operational mitigation plans and procedures, including but not limited to:</p> <p style="padding-left: 20px;">i. Traffic management plans</p> <p style="padding-left: 20px;">ii. Emergency closure plans (stop work plans)</p>	<p>Required Operating Procedure 23.1</p> <p><u>Objective:</u> To ensure monitoring and research in place to implement a caribou Adaptive Research and Management Plan (ARMP).</p> <p><u>Requirement/Standard:</u></p> <p>The lessee/operator/contractor would develop an ARMP to identify research needs, evaluate existing/ongoing management and mitigation efforts, quantify impacts, and identify management changes when necessary. This plan would be submitted to USFWS, BLM, and the International Porcupine Caribou Herd Technical Committee (PCTC) for review and approval. The lessee would provide adequate funds to implement this monitoring program. BLM and USFWS would hire an organization or agency to carry out this monitoring program. The ARMP would be initiated after leasing and before the facility planning stage and will include but not be limited to:</p> <p>a. Formation of an ARMP Steering Committee, including staff from the BLM, USFWS, the PCTC, and Tribal representatives, to oversee the ARMP and its implementation,</p> <p style="padding-left: 20px;">i. The PCTC would prioritize projects that address research questions.</p> <p>b. Development of an ARMP monitoring program with full industry engagement,</p> <p>c. Development of an accessible and comprehensive data repository,</p> <p>d. Annual monitoring and evaluation program,</p> <p>e. In consultation with BLM, USFWS, the PCTC, industry representatives, and Tribal Governments, develop, standardize, and modify as necessary operational mitigation plans and procedures, including but not limited to:</p> <p style="padding-left: 20px;">i. Traffic management plans</p> <p style="padding-left: 20px;">ii. Emergency closure plans (stop work plans)</p> <p style="padding-left: 20px;">iii. Aircraft use plan (see ROP 34)</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 24</p> <p><u>Objective:</u> Minimize the impact of mineral materials mining on air, land, water, fish, and wildlife resources.</p> <p><u>Requirement/Standard:</u> Gravel mine site design, construction, and reclamation would be done in accordance with a plan approved by the BLM Authorized Officer. The plan would take into consideration the following:</p> <ul style="list-style-type: none"> a. Locations inside or outside the active floodplain, depending on potential site-specific impacts b. Design and construction of gravel mine sites in active floodplains to serve as water reservoirs for future use c. Potential use of the site for enhancing fish and wildlife habitat d. Potential storage and reuse of sod/overburden for the mine site or at other disturbed sites on the North Slope 	<p>Required Operating Procedure 24</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Gravel mine site design, construction, and reclamation would be done in accordance with a plan approved by the BLM Authorized Officer. The plan would take into consideration the following:</p> <ul style="list-style-type: none"> a. Construction of gravel mine sites or water reservoirs may not be considered within the active floodplains of the four rivers that support populations of freshwater, anadromous, or endemic fish (Canning, Sadlerochit, Hulahula, and Aichilik Rivers) b. Design and construction of gravel mine sites may be considered at locations inside or outside of the active floodplain c. Design and construction of gravel mine sites that may also serve as water reservoirs may be considered in active floodplains, except for waters identified in "a," above d. Potential storage and reuse of sod/overburden for the mine site or at other disturbed sites on the North Slope e. All constructed water storage reservoirs should be a sufficient distance from drill sites, fueling stations, or other temporary or permanent site that generates or maintains more than 220 gallons of fuel, drilling fluids, or other hazardous materials to avoid contamination via surface or groundwater of the storage reservoir; the lessee should implement a water quality and contaminants monitoring program for any constructed water storage facility 	<p>Required Operating Procedure 24</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Gravel mine site design, construction, and reclamation would be done in accordance with a plan approved by the BLM Authorized Officer. The plan would take into consideration the following:</p> <ul style="list-style-type: none"> a. Construction of gravel mine sites would be prohibited from the following rivers that support resident, anadromous, or endemic fish populations: <ul style="list-style-type: none"> i. Canning/Staines River ii. West Fork Tamayariak River iii. Middle Fork Tamayariak River iv. Tamayariak River v. Itkilyariak Creek vi. Hulahula River vii. Aichilik River viii. Sadlerochit River ix. Sadlerochit Spring Creek b. Design and construction of gravel mine sites may be considered at locations inside or outside of the active floodplain c. Design and construction of gravel mine sites that may also serve as water reservoirs may be considered in active floodplains, except for rivers or creeks that support resident, anadromous, or endemic fish populations as outlined in Lease Stipulation 1 and identified above. d. Potential storage and reuse of sod/overburden for the mine site or at other disturbed sites on the North Slope. e. All constructed water storage reservoirs shall be a sufficient distance from drill sites, fueling stations, or other temporary or permanent site that generates or maintains more than 220 gallons of fuel, drilling fluids, or other hazardous materials to avoid contamination via surface or groundwater of the storage reservoir; the lessee shall implement a water quality and contaminants monitoring program for any constructed water storage facility. The monitoring program would be described in the Mine Plan. f. If any sand or gravel mining is proposed at outcrops or cliffs, the lessee/permittee/operator would map suitable raptor nesting habitat and conduct surveys for known raptor nest sites prior to submitting a Plan of Operations. This information would be used in the development of Mine Plans to show how mine sites would be located and designed to minimize impacts to suitable raptor nesting habitat and nesting raptors. 	<p>Required Operating Procedure 24</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Gravel mine site design, construction, and reclamation would be done in accordance with a plan approved by the BLM Authorized Officer in coordination with the USFWS and local traditional knowledge holders. The plan would take into consideration the following:</p> <ul style="list-style-type: none"> a. Construction of gravel mine sites would be prohibited from the following rivers that support resident, anadromous, or endemic fish populations: <ul style="list-style-type: none"> i. Canning/Staines River ii. West Fork Tamayariak River iii. Middle Fork Tamayariak River iv. Tamayariak River v. Itkilyariak Creek vi. Hulahula River vii. Aichilik River viii. Sadlerochit River ix. Sadlerochit Spring Creek b. Design and construction of gravel mine sites may be considered at locations inside or outside of the active floodplain c. Design and construction of gravel mine sites that may also serve as water reservoirs may be considered in active floodplains, except for rivers or creeks that support resident, anadromous, or endemic fish populations as outlined in Lease Stipulation 1 and identified above. d. Potential storage and reuse of sod/overburden for the mine site or at other disturbed sites on the North Slope. e. All constructed water storage reservoirs shall be a sufficient distance from drill sites, fueling stations, or other temporary or permanent site that generates or maintains more than 220 gallons of fuel, drilling fluids, or other hazardous materials to avoid contamination via surface or groundwater of the storage reservoir; the lessee shall implement a water quality and contaminants monitoring program for any constructed water storage facility. The monitoring program would be described in the Mine Plan. f. If any sand or gravel mining is proposed at outcrops or cliffs, the lessee/permittee/operator would map suitable raptor nesting habitat and conduct surveys for known raptor nest sites prior to submitting a Plan of Operations. This information would be used in the development of Mine Plans to show how mine sites would be located and designed to minimize impacts to suitable raptor nesting habitat and nesting raptors.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 25</p> <p><u>Objective:</u> Avoid human-caused changes in predator populations on ground-nesting birds.</p> <p><u>Requirement/Standard:</u></p> <p>a. Lessee/operator/contractor would use best available technology to prevent facilities from providing nesting, denning, or shelter sites for ravens, raptors, and foxes. The lessee/operator/contractor would provide the BLM Authorized Officer with an annual report on the use of oil and gas facilities by ravens, raptors, and foxes as nesting, denning, and shelter sites. This report will be shared with local traditional knowledge holders upon request.</p> <p>b. Feeding of wildlife and allowing wildlife to access human food or odor-emitting waste would be prohibited.</p>	<p>Required Operating Procedure 25</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 25</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 25</p> <p>Same as Alternative B.</p>
<p>Required Operating Procedure 26</p> <p><u>Objective:</u> Reduction of risk of attraction and collisions between migrating birds and oil and gas and related facilities during low light conditions.</p> <p><u>Requirement/Standard:</u> All structures would be designed to direct artificial exterior lighting, from August 1 to October 31, inward and downward, rather than upward and outward, unless otherwise required by the Federal Aviation Administration (FAA).</p>	<p>Required Operating Procedure 26</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 26</p> <p><u>Objective:</u> Minimize the risk of migrating birds being attracted to and colliding with oil and gas related infrastructure during low light conditions.</p> <p><u>Requirement/Standard:</u> Same as Alternative B.</p>	<p>Required Operating Procedure 26</p> <p><u>Objective:</u> Minimize the risk of migrating birds being attracted to and colliding with oil and gas related infrastructure during low light conditions.</p> <p><u>Requirement/Standard:</u> Same as Alternative B.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 27</p> <p><u>Objective:</u> Minimize the impacts to bird species from direct interaction with oil and gas facilities.</p> <p><u>Requirement/Standard:</u></p> <p>a. To reduce the possibility of birds colliding with aboveground utility lines (power and communication), such lines would either be buried in access roads or would be suspended on VSMs, except in rare cases, limited in extent. Exceptions are limited to the following situations:</p> <ol style="list-style-type: none"> i. Overhead power or communication lines may be allowed when located entirely within the boundaries of a facility pad; ii. Overhead power or communication lines may be allowed when engineering constraints at the specific and limited location make it infeasible to bury or connect the lines to a VSM; or iii. Overhead power or communication lines may be allowed in situations when human safety would be compromised by other methods. iv. If exceptions are granted allowing overhead wires, overhead wires would be clearly marked along their entire length to improve visibility to low-flying birds. Such markings would be developed through consultation with the USFWS. <p>b. To reduce the likelihood of birds colliding with them, communication towers would be located, to the extent practicable, on existing pads and as close as possible to buildings or other structures and on the east or west side of buildings or other structures. Towers would be designed to reduce bird strikes and raptor nesting. Support wires associated with communication towers, radio antennae, and other similar facilities, would be avoided to the extent practicable. If support wires are necessary, they would be clearly marked along their entire length to improve visibility to low-flying birds. Such markings would be developed through consultation with the USFWS.</p>	<p>Required Operating Procedure 27</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 27</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>a. To reduce the possibility of birds colliding with aboveground utility lines (power and communication), such lines would be limited in extent and exceptions would be rare. Exceptions would be limited to the following situations:</p> <ol style="list-style-type: none"> i. Overhead power or communication lines may be allowed when located entirely within the boundaries of a facility pad; ii. Overhead power or communication lines may be allowed when engineering constraints at a specific location make it infeasible to bury or connect the lines to a VSM; or iii. Overhead power or communication lines may be allowed in situations when human safety would be compromised by other methods. If exceptions are granted allowing overhead wires, overhead wires would be clearly marked along their entire length to improve visibility to low-flying birds. Such markings would be developed through consultation with the USFWS. <p>b. To reduce the likelihood of birds colliding with them, communication towers would be located, to the extent practicable, on existing pads and as close as possible to buildings or other structures. Towers would be designed to reduce both bird strikes and raptor nesting. Support wires associated with communication towers, radio antennae, and other similar facilities, would be avoided to the extent practicable. If support wires are deemed necessary, they would be clearly marked along their entire length to improve visibility to low-flying birds. Such markings would be developed through consultation with the USFWS.</p>	<p>Required Operating Procedure 27</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>a. To reduce the possibility of birds colliding with aboveground utility lines (power and communication), such lines would be limited in extent and exceptions would be rare. Exceptions would be limited to the following situations:</p> <ol style="list-style-type: none"> i. Overhead power or communication lines may be allowed when located entirely within the boundaries of a facility pad; ii. Overhead power or communication lines may be allowed when engineering constraints at a specific location make it infeasible to bury or connect the lines to a VSM; or iii. Overhead power or communication lines may be allowed in situations when human safety would be compromised by other methods. If exceptions are granted allowing overhead wires, overhead wires would be clearly marked along their entire length to improve visibility to low-flying birds. Such markings would be developed through consultation with the USFWS and local traditional knowledge holders. <p>b. To reduce the likelihood of birds colliding with them, communication towers would be located, to the extent practicable, on existing pads and as close as possible to buildings or other structures and on the east or west side of buildings or other structures. Towers would be designed to reduce both bird strikes and raptor nesting. Support wires associated with communication towers, radio antennae, and other similar facilities, would be avoided to the extent practicable. If support wires are deemed necessary, they would be clearly marked along their entire length to improve visibility to low-flying birds. Such markings would be developed through consultation with the USFWS.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 28</p> <p><u>Objective:</u> Use ecological mapping as a tool to assess wildlife habitat before developing permanent facilities to conserve important habitat types.</p> <p><u>Requirement/Standard:</u> An ecological land classification map of the area would be developed before approval of facility construction. The map would integrate geomorphology, surface form, and vegetation at a scale and level of resolution and position accuracy adequate for detailed analysis of development alternatives. The map would be prepared in time to plan an adequate number of seasons of ground-based wildlife surveys needed, if deemed necessary by the BLM Authorized Officer, before the exact facility location and facility construction is approved.</p>	<p>Required Operating Procedure 28</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 28</p> <p><u>Objective:</u> Use ecological mapping (or equivalent) as a tool to assess wildlife habitat before developing permanent facilities to conserve important habitat types.</p> <p><u>Requirement/Standard:</u> An ecological land classification map (or similar instrument) that incorporates available Traditional knowledge of the area would be developed before approval of facility construction. The map would integrate geomorphology, surface form, and vegetation including BLM sensitive plant species and habitat for BLM sensitive wildlife species, local Traditional knowledge when available, and ice rich soils and locations of yedoma deposits, at a scale and level of resolution and position accuracy adequate for detailed analysis of development alternatives. The map would be prepared in time to inform siting of facilities and to plan an adequate number of seasons of ground-based wildlife surveys needed, if deemed necessary by the BLM Authorized Officer. A separate map shall be developed displaying detailed water flowlines and small-scale delineation of drainage catchments based on LIDAR (or other high-accuracy surface imaging) to inform facility location. Consider climate change modeling of ecosystem changes and key ecological regions before the exact facility location and facility construction is approved.</p>	<p>Required Operating Procedure 28</p> <p><u>Objective:</u> Use ecological mapping (or equivalent) as a tool to assess fish and wildlife habitat before developing permanent facilities to conserve important habitat types.</p> <p><u>Requirement/Standard:</u> An ecological land classification map (or similar instrument) that incorporates available Traditional knowledge of the area would be developed before approval of facility construction. The map would integrate geomorphology, surface form, and vegetation including BLM sensitive plant species and habitat for BLM sensitive fish and wildlife species, local Traditional knowledge when available, and ice rich soils and locations of yedoma deposits, at a scale and level of resolution and position accuracy adequate for detailed analysis of development alternatives. The map would be prepared in time to inform siting of facilities and to plan an adequate number of seasons of ground-based wildlife surveys needed, if deemed necessary by the BLM Authorized Officer in coordination with the USFWS. A separate map shall be developed displaying detailed water flowlines and small-scale delineation of drainage catchments based on LIDAR (or other high-accuracy surface imaging) to inform facility location. Consider climate change modeling of ecosystem changes and key ecological regions before the exact facility location and facility construction is approved.</p>
<p>Required Operating Procedure 29</p> <p><u>Objective:</u> Protect cultural and paleontological resources.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor would conduct a cultural and paleontological resources survey before any ground-disturbing activity, based on a study designed by the lessee/operator/contractor and approved by the BLM Authorized Officer. If any potential cultural or paleontological resource is found, the lessee/operator/contractor would notify the BLM Authorized Officer and would suspend all operations in the immediate area until she or he issues a written authorization to proceed.</p>	<p>Required Operating Procedure 29</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 29</p> <p><u>Objective:</u> Protect cultural resources.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor shall adhere to the conditions and stipulations of the Coastal Plain's Section 106 Programmatic Agreement (PA) or otherwise assist BLM with carrying out the requirements of the PA.</p>	<p>Required Operating Procedure 29</p> <p><u>Objective:</u> Protect cultural resources.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor shall adhere to the conditions and stipulations of the Coastal Plain's Section 106 Programmatic Agreement (PA) or otherwise assist BLM with carrying out the requirements of the PA.</p>
<p>Required Operating Procedure 29.1</p> <p>See ROP 29.</p>	<p>Required Operating Procedure 29.1</p> <p>See ROP 29.</p>	<p>Required Operating Procedure 29.1</p> <p><u>Objective:</u> Protect paleontological resources.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor shall, in consultation with the federal agencies, refer to available resources to avoid impacting areas known to contain, or likely to contain, paleontological resources. If any potential paleontological resource is found, the lessee/operator/contractor would notify the BLM Authorized Officer and would suspend all operations in the immediate area until she or he issues a written authorization to proceed.</p>	<p>Required Operating Procedure 29.1</p> <p><u>Objective:</u> Protect paleontological resources.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor shall, in consultation with the federal agencies, refer to available resources to avoid impacting areas known to contain, or likely to contain, paleontological resources. If any potential paleontological resource is found, the lessee/operator/contractor would notify the BLM Authorized Officer and would suspend all operations in the immediate area until she or he coordinates with the USFWS and issues a written authorization to proceed.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 30</p> <p><u>Objective:</u> Prevent or minimize the loss of nesting habitat for cliff-nesting raptors.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Removing greater than 100 cubic yards of bedrock outcrops, sand, or gravel from cliffs shall be prohibited. b. Any extraction of sand or gravel from an active river or stream channel would be prohibited, unless preceded by a hydrological study that indicates no potential impact on the integrity of the river bluffs. 	<p>Required Operating Procedure 30</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 30</p> <p>See ROP 24.</p>	<p>Required Operating Procedure 30</p> <p>See ROP 24.</p>
<p>Required Operating Procedure 31</p> <p><u>Objective:</u> Prevent or minimize the loss of raptors due to electrocution by power lines.</p> <p><u>Requirement/Standard:</u> Comply with the most up-to-date, industry-accepted, recommended practices for raptor protection on power lines. Current accepted standards were published in Reducing Avian Collisions with Power Lines: The State of the Art in 2012, by the Avian Power Line Interaction Committee (APLIC 2012) and are updated as needed.</p>	<p>Required Operating Procedure 31</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 31</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 31</p> <p>Same as Alternative B.</p>
<p>Required Operating Procedure 32</p> <p><u>Objective:</u> Avoid and reduce temporary impacts on productivity from disturbance near Steller's or spectacled eider nests.</p> <p><u>Requirement/Standard:</u> Ground-level vehicle or foot traffic within 200 meters (656 feet) of occupied Steller's or spectacled eider nests, from June 1 through July 31, would be restricted to existing thoroughfares, such as pads and roads. Construction of permanent facilities, placement of fill, alteration of habitat, and introduction of high noise levels within 200 meters (656 feet) of occupied Steller's or spectacled eider nests would be prohibited. Between June 1 and August 15, support/construction activity must occur off existing thoroughfares, and BLM and USFWS-approved nest surveys must be conducted during mid-June before the activity is approved. Collected data would be used to evaluate whether the action could occur based on a 200-meter (656-foot) buffer around nests or if the activity would be delayed until after mid-August once ducklings are mobile and have left the nest site. The BLM would also work with the USFWS to conduct nest surveys or oil spill response training in riverine, marine, and intertidal areas that is within 200 meters (656 feet) of shore outside sensitive nesting/brood-rearing periods. The protocol and timing of nest surveys for Steller's or spectacled eiders would be determined in cooperation with and must be approved by the USFWS. Surveys would be supervised by biologists who have previous experience with Steller's or spectacled eider nest surveys.</p>	<p>Required Operating Procedure 32</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 32</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Ground-level vehicle or foot traffic within 200 meters (656 feet) of occupied Steller's or spectacled eider nests, from June 1 through July 31, would be restricted to existing thoroughfares, such as pads and roads. Construction of permanent facilities, placement of fill, alteration of habitat, and introduction of high noise levels within 200 meters (656 feet) of occupied Steller's or spectacled eider nests would be prohibited. Between June 1 and August 15, support/construction activity that must occur off existing thoroughfares, require BLM and USFWS-approved nest surveys to be conducted during mid-June before the activity is approved. Data collected from Steller's or spectacled eider nesting habitats would be used to evaluate whether the action could occur based on a 200-meter (656-foot) buffer around known nests or if the activity would be delayed until after mid-August once ducklings are mobile and have left the nest site. The BLM would also work with the USFWS to conduct oil spill response training in riverine, marine, and intertidal areas outside sensitive nesting/brood-rearing periods. If these activities must take place during the nesting and brood-rearing periods surveys for nesting and/or brood-rearing eiders would be required. The protocol and timing of nest or brood surveys for Steller's or spectacled eiders would be determined in cooperation with, and must be approved by, the USFWS. Surveys would be supervised by biologists who have previous experience with Steller's or spectacled eider nest surveys.</p>	<p>Required Operating Procedure 32</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> Ground-level vehicle or foot traffic within 200 meters (656 feet) of occupied Steller's or spectacled eider nests, from June 1 through July 31, would be restricted to existing thoroughfares, such as pads and roads. Construction of permanent facilities, placement of fill, alteration of habitat, and introduction of high noise levels within 200 meters (656 feet) of occupied Steller's or spectacled eider nests would be prohibited. Between June 1 and August 15, support/construction activity that must occur off existing thoroughfares, require BLM and USFWS-approved nest surveys to be conducted during mid-June before the activity is approved. Data collected from Steller's or spectacled eider nesting habitats would be used to evaluate whether the action could occur based on a 200-meter (656-foot) buffer around known nests or if the activity would be delayed until after mid-August once ducklings are mobile and have left the nest site. The BLM would also work with the USFWS to conduct oil spill response training in riverine, marine, and intertidal areas outside sensitive nesting/brood-rearing periods. If these activities must take place during the nesting and brood-rearing periods surveys for nesting and/or brood-rearing eiders would be required. The protocol and timing of nest or brood surveys for Steller's or spectacled eiders would be determined in cooperation with, and must be approved by, the USFWS. Surveys would be supervised by biologists who have previous experience with Steller's or spectacled eider nest surveys. The survey results would be provided to the NSB upon request.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 33</p> <p><u>Objective:</u> Provide information to be used in monitoring and assessing wildlife movements during and after construction.</p> <p><u>Requirement/Standard:</u> A representation, in the form of ArcGIS-compatible shapefiles, of the footprint of all new infrastructure construction would be provided to the BLM Authorized Officer, the USFWS Arctic Refuge Manager, State of Alaska, and NSB by the operator. During the planning and permitting phase, GIS shape files representing proposed footprint locations would be provided. Within 6 months of construction completion, shapefiles of all new infrastructure footprints would be provided. Infrastructure includes all gravel roads and pads, facilities built on pads, pipelines, and independently constructed power lines (as opposed to those incorporated in pipeline design). Gravel pads would be included as polygon features. Roads, pipelines, and power lines may be represented as line features but must include ancillary data to denote such data as width and number of pipes. Poles for power lines may be represented as point features. Ancillary data would include construction beginning and ending dates.</p>	<p>Required Operating Procedure 33</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 33</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The operator/lessee will provide representation, in the form of ArcGIS-compatible shapefiles, of the footprint of all temporary and new permanent infrastructure construction would be provided to the BLM Authorized Officer, the USFWS Arctic Refuge Manager, State of Alaska, appropriate Tribal Governments, and NSB by the operator. During the planning and permitting phase, GIS shape files representing proposed footprint locations would be provided. Within 6 months of construction completion, shapefiles of all temporary and new permanent infrastructure footprints would be provided. Infrastructure includes all ice, snow and gravel roads, ice and gravel pads, facilities built on pads, pipelines, mines, reservoirs, islands, docks, and independently constructed power lines (as opposed to those incorporated in pipeline design). ArcGIS compatible shapefiles would also be provided for all proposed water sources. Gravel pads would be included as polygon features. Roads, pipelines, and power lines may be represented as line features but must include ancillary data to denote such data as width and number of pipes. Poles for power lines may be represented as point features. Ancillary data would include construction beginning and ending dates.</p>	<p>Required Operating Procedure 33</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The operator/lessee will provide representation, in the form of ArcGIS-compatible shapefiles, of the footprint of all temporary and new permanent infrastructure construction would be provided to the BLM Authorized Officer, the USFWS Arctic Refuge Manager, State of Alaska, appropriate Tribal Governments, and NSB by the operator. During the planning and permitting phase, GIS shape files representing proposed footprint locations would be provided. Within 6 months of construction completion, shapefiles of all temporary and new permanent infrastructure footprints would be provided. Infrastructure includes all ice, snow and gravel roads, ice and gravel pads, facilities built on pads, pipelines, mines, reservoirs, islands, docks, and independently constructed power lines (as opposed to those incorporated in pipeline design). ArcGIS compatible shapefiles would also be provided for all proposed water sources. Gravel pads would be included as polygon features. Roads, pipelines, and power lines may be represented as line features but must include ancillary data to denote such data as width and number of pipes. Poles for power lines may be represented as point features. Ancillary data would include construction beginning and ending dates.</p>
USE OF AIRCRAFT FOR PERMITTED ACTIVITIES			
<p>Required Operating Procedure 34</p> <p><u>Objective:</u> Minimize the effects of low-flying aircraft on wildlife, subsistence activities, local communities, and recreationists of the area, including hunters and anglers.</p> <p><u>Requirement/Standard:</u> The operator would ensure that operators of aircraft used for permitted oil and gas activities and associated studies maintain altitudes according to the following guidelines (Note: This ROP is not intended to restrict flights necessary to survey wildlife to gain information necessary to meet the stated objectives of the lease stipulations and ROPs; however, such flights would be restricted to the minimum necessary to collect such data and should consider other technologies, such as remote sensing and drones, in order to minimize impacts from aircraft):</p> <p>a. Land users would submit an aircraft use plan as part of an oil and gas exploration or development proposal, which includes a plan to monitor flights and includes a reporting system for subsistence hunters to easily report flights that disturb subsistence harvest. The plan would address strategies to minimize impacts on subsistence hunting and associated activities, including the number of flights, type of aircraft, and flight altitudes and routes, and would also include a plan to monitor flights. Proposed aircraft use plans would be reviewed by the appropriate Alaska Native or subsistence organization. Consultations with these same agencies would be required if unacceptable disturbance is identified by subsistence users. Adjustments, including possible suspension of all flights, may be required by the BLM Authorized Officer, if resulting disturbance is</p>	<p>Required Operating Procedure 34</p> <p><u>Objective:</u> Same as Alternatives B.</p> <p><u>Requirement/Standard:</u> Same as Alternative B, except:</p> <p>a. Requirement “c” adjusts the altitude to 2,000 feet above ground level;</p> <p>b. Requirements “c” and “d” include the caribou post-calving and calving range;</p> <p>c. Requirement “d” minimizes the number of helicopter landings in caribou calving and post-calving ranges from May 20 through July 20; and</p> <p>d. Requirement ‘k’ minimizes potential disturbance of unobserved polar bears.</p>	<p>Required Operating Procedure 34</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The operator would ensure that operators of aircraft used for permitted oil and gas activities and associated studies (such as cultural resource surveys) maintain altitudes according to the following guidelines (Note: This ROP is not intended to restrict flights necessary to survey wildlife to gain information necessary to meet the stated objectives of the lease stipulations and ROPs; however, such flights would be restricted to the minimum necessary to collect such data and should consider other technologies, such as remote sensing and drones, in order to minimize impacts from aircraft):</p> <p>a. The lessee/operator/contractor would review and report on local Traditional Knowledge, as available, of the effects of low-flying aircraft on wildlife, subsistence activities, and local communities prior to construction to inform best operations principles. The lessee/operator/contractor would consult with Tribal Governments, BLM, and USFWS throughout the review. Tribal Governments, BLM, and USFWS would review, request changes, or finalize the report prior to operation.</p> <p>b. Land users would submit an aircraft use plan as part of an oil and gas exploration or development proposal, which includes a plan to monitor flights and includes a reporting system for subsistence hunters to easily report flights that disturb subsistence harvest. The plan would address strategies to minimize impacts on subsistence hunting and associated activities, including the number of flights, type of aircraft, and flight altitudes and routes, and would also include a plan to monitor flights. Proposed aircraft use plans would be</p>	<p>Required Operating Procedure 34</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The operator would ensure that operators of aircraft used for permitted oil and gas activities and associated studies (such as cultural resource surveys) maintain altitudes according to the following guidelines (Note: This ROP is not intended to restrict flights necessary to survey wildlife to gain information necessary to meet the stated objectives of the lease stipulations and ROPs; however, such flights would be restricted to the minimum necessary to collect such data and should consider other technologies, such as remote sensing and drones, in order to minimize impacts from aircraft):</p> <p>a. The lessee/operator/contractor would review and report on local Traditional Knowledge, as available, of the effects of low-flying aircraft on wildlife, subsistence activities, and local communities prior to construction to inform best operations principles. The lessee/operator/contractor would consult with Tribal Governments, BLM, and USFWS throughout the review. Tribal Governments, BLM, and USFWS would review, request changes, or finalize the report prior to operation.</p> <p>b. Land users would submit an aircraft use plan as part of an oil and gas exploration or development proposal, which includes a plan to monitor flights and includes a reporting system for subsistence hunters to easily report flights that disturb subsistence harvest. The plan would address strategies to minimize impacts on subsistence hunting and associated activities, including the number of flights, type of aircraft, and flight altitudes and routes, and would also include a plan to monitor flights. Proposed aircraft use plans would be reviewed by the appropriate Alaska Native or subsistence organization. Consultations with these same agencies would be</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>determined to be unacceptable. The number of takeoffs and landings to support oil and gas operations with necessary materials and supplies would be limited to the maximum extent practical.</p> <p>b. Use of aircraft, especially rotary wing aircraft, would be kept to a minimum near known subsistence camps and cabins or during sensitive subsistence hunting periods (e.g., spring goose hunting, summer caribou) and when recreationists are present.</p> <p>c. Operators of aircraft used for permitted activities would maintain an altitude of at least 2,000 feet above ground level (except for takeoffs and landings) within 0.5 miles of cliffs identified as raptor nesting sites, and over caribou calving range, unless doing so would endanger human life or violate safe flying practices. An exception to flight altitudes may be approved by the Authorized Officer after coordination and review of the aircraft use plan to accommodate requirements to fly lower for some required activities (e.g., archaeological clearance).</p> <p>d. Minimize the number of helicopter landings in caribou calving ranges from May 20 through June 20.</p> <p>e. Pursuing running wildlife is hazing. Hazing wildlife by aircraft pilots is prohibited, unless otherwise authorized. If wildlife begins to run as an aircraft approaches, the aircraft is too close, and the operator must break away.</p> <p>f. Avoid operation of aircraft over snow goose staging areas between August 15 and September 30. Necessary overflights during this timeframe should avoid areas of heavy snow goose concentrations.</p> <p>g. When polar bears are present:</p> <ol style="list-style-type: none"> i. Operators of support aircraft should conduct their activities at the maximum distance possible from concentrations of polar bears. ii. Aircraft will not operate at an altitude lower than 610 meters (2,000 feet) within 805 meters (0.5 miles) of polar bears observed on ice or land. Helicopters may not hover or circle above such areas or within 805 meters (0.5 miles) of such areas. When weather conditions do not allow a 610-meter (2,000-foot) flying altitude, operators will take precautions to avoid flying directly over or within 805 meters (0.5 miles) of these areas. iii. Plan all aircraft routes to minimize any potential conflict with known subsistence polar bear hunting activity 	<p>(see above)</p>	<p>reviewed by the appropriate Alaska Native or subsistence organization. Consultations with these same agencies would be required if unacceptable disturbance is identified by subsistence users. Adjustments, including possible suspension of all flights, may be required by the BLM Authorized Officer, in coordination with Tribal Governments, if resulting disturbance is determined to be unacceptable. The number of takeoffs and landings to support oil and gas operations with necessary materials and supplies would be limited to the maximum extent practical.</p> <p>c. Use of aircraft, especially rotary wing aircraft, would be kept to a minimum near known subsistence camps and cabins or during sensitive subsistence hunting periods (e.g., spring goose hunting, summer caribou) and when recreationists are present.</p> <p>d. Operators of aircraft used for permitted activities would maintain an altitude of at least 2,000 feet above ground level (except for takeoffs and landings) within 0.5 miles of cliffs identified as raptor nesting sites, and over PCH comprehensive caribou calving and post-calving areas, or within 1 mile of polar bear denning habitat (as identified by USGS polar bear den habitat maps) between October 30 and April 30, unless doing so would endanger human life or violate safe flying practices. An exception to flight altitudes may be approved by the BLM Authorized Officer, in coordination with Tribal Governments, after coordination and review of the aircraft use plan to accommodate requirements to fly lower for some required activities (e.g., archaeological clearance).</p> <p>e. Avoid operation of aircraft over parturient caribou and caribou calves between May 20 and July 20. This window may be shifted earlier if parturient caribou move towards calving grounds before May 20 due to warming climate conditions.</p> <p>f. Prohibit landing helicopters in PCH comprehensive calving and post-calving habitat areas from May 20 through July 20 to avoid disturbing cow-calf pairs unless doing so would endanger human life or violate safe flying practices.</p> <p>g. Pursuing running wildlife is hazing. Hazing wildlife by aircraft pilots is prohibited, unless otherwise authorized. If wildlife begins to run as an aircraft approaches, the aircraft is too close, and the operator must break away.</p> <p>h. Avoid operation of aircraft over snow goose staging areas between August 15 and September 30. Necessary overflights during this timeframe should avoid areas of heavy snow goose concentrations.</p> <p>i. To avoid impacts on productivity of breeding birds, aircraft take-offs and landings must be minimized at unimproved sites during the nesting season.</p> <p>j. When polar bears are present:</p> <ol style="list-style-type: none"> i. Operators of support aircraft should conduct their activities at the maximum distance (greater than 1 mile) possible from polar bears. ii. Aircraft would not operate at an altitude lower than 457 meters (2,000 feet) within 805 meters (0.5 miles) of polar bears observed on ice or land. Helicopters may not hover or circle above such areas or within 805 meters (0.5 miles) of such areas. When weather conditions do not allow a 457-meter (2000-foot) flying altitude, operators would take precautions to avoid flying directly over or within 805 meters (0.5 miles) of these areas. 	<p>required if unacceptable disturbance is identified by subsistence users. Adjustments, including possible suspension of all flights, may be required by the BLM Authorized Officer, in coordination with the USFWS and Tribal Governments, if resulting disturbance is determined to be unacceptable. The number of takeoffs and landings to support oil and gas operations with necessary materials and supplies would be limited to the maximum extent practical and consistent with prudent operation of facilities.</p> <p>c. Use of aircraft, especially rotary wing aircraft, would be kept to a minimum near known subsistence camps and cabins or during sensitive subsistence hunting periods (e.g., spring goose hunting, summer caribou) and when recreationists are present.</p> <p>d. Operators of aircraft used for permitted activities would maintain an altitude of at least 2,000 feet above ground level (except for takeoffs and landings) within 0.5 miles of cliffs identified as raptor nesting sites, and over PCH comprehensive caribou calving and post-calving areas, or within 1 mile of polar bear denning habitat (as identified by USGS polar bear den habitat maps) between October 30 and April 30, unless doing so would endanger human life or violate safe flying practices. An exception to flight altitudes may be approved by the BLM Authorized Officer, in coordination with the USFWS and Tribal Governments, after coordination and review of the aircraft use plan to accommodate requirements to fly lower for some required activities (e.g., archaeological clearance).</p> <p>e. Avoid operation of aircraft over parturient caribou and caribou calves between May 20 and July 20. This window may be shifted earlier if parturient caribou move towards calving grounds before May 20 due to warming climate conditions.</p> <p>f. Prohibit landing helicopters in PCH comprehensive calving and post-calving habitat areas from May 20 through July 20 to avoid disturbing cow-calf pairs unless doing so would endanger human life or violate safe flying practices.</p> <p>g. Pursuing running wildlife is hazing. Hazing wildlife by aircraft pilots is prohibited, unless otherwise authorized. If wildlife begins to run as an aircraft approaches, the aircraft is too close, and the operator must break away.</p> <p>h. Avoid operation of aircraft over snow goose staging areas between August 15 and September 30. Necessary overflights during this timeframe should avoid areas of heavy snow goose concentrations.</p> <p>i. To avoid impacts on productivity of breeding birds, aircraft take-offs and landings must be minimized at unimproved sites during the nesting season.</p> <p>j. When polar bears are present:</p> <ol style="list-style-type: none"> i. Operators of support aircraft should conduct their activities at the maximum distance (greater than 1 mile) possible from polar bears. ii. Aircraft would not operate at an altitude lower than 457 meters (2,000 feet) within 805 meters (0.5 miles) of polar bears observed on ice or land. Helicopters may not hover or circle above such areas or within 805 meters (0.5 miles) of such areas. When weather conditions do not allow a 457-meter (2000-foot) flying altitude, operators would take precautions to avoid flying directly over or within 805 meters (0.5 miles) of these areas. iii. Operators would avoid flying over areas where polar bears are known to congregate during different seasons (for example, along the coastline from August to October) when practicable.

Alternative B	Alternative C	Alternative D	Alternative D2
(see above)	(see above)	<ul style="list-style-type: none"> iii. Operators would avoid flying over areas where polar bears are known to congregate during different seasons (for example, along the coastline from August to October) when practicable. iv. Plan all aircraft routes to minimize any potential conflict with known subsistence polar bear hunting activity. v. To minimize disturbance of unobserved polar bears, aircraft operations will maintain an altitude of 2,000 feet above ground level when safe and operationally possible. 	<ul style="list-style-type: none"> iv. Plan all aircraft routes to minimize any potential conflict with known subsistence polar bear hunting activity. v. To minimize disturbance of unobserved polar bears, aircraft operations will maintain an altitude of 2,000 feet above ground level when safe and operationally possible.
OIL AND GAS FIELD ABANDONMENT			
<p>Required Operating Procedure 35</p> <p><u>Objective:</u> Ensure ongoing and long-term reclamation of land to its previous condition and use.</p> <p><u>Requirement/Standard:</u> Before final abandonment, land used for oil and gas infrastructure—including well pads, production facilities, access roads, and airstrips—would be reclaimed. The leaseholder would develop and implement a BLM-approved abandonment and reclamation plan. The plan would describe short-term stability, visual, hydrological, and productivity objectives and steps to be taken to ensure eventual rehabilitation to the land’s previous hydrological, vegetation, and habitat functions. The BLM Authorized Officer may grant exceptions to satisfy stated environmental or public purposes.</p>	<p>Required Operating Procedure 35</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Oil and gas infrastructure, including gravel pads, roads, airstrips, wells and production facilities, would be removed and the land restored on an ongoing basis, as extraction is complete. b. Before final abandonment, land used for oil and gas infrastructure—including well pads, production facilities, access roads, and airstrips—would be restored to ensure eventual restoration of ecosystem function and to restore general wilderness characteristics. The leaseholder would develop and implement a BLM-approved abandonment and reclamation plan. The plan would describe short-term stability, visual, hydrological, and productivity objectives and steps to be taken to ensure eventual ecosystem restoration to the land’s previous hydrological, vegetation, and habitat condition, wild and scenic river (WSR) eligibility/suitability, and intent to restore general wilderness characteristics of the area. The BLM Authorized Officer may grant exceptions to satisfy stated environmental or public purposes. c. Reclamation shall include but not be limited to: <ul style="list-style-type: none"> i. Saving of topsoil for final application after reshaping of disturbed areas have been completed; ii. Measures to control erosion, landslides, and water runoff; iii. Measures to isolate, remove, or control toxic materials; iv. Reshaping the area disturbed, application of the topsoil, and revegetation of disturbed areas, where reasonably practicable; and v. Rehabilitation of fisheries and wildlife habitat. <p>When reclamation of the disturbed area has been completed, the Authorized Officer shall be notified so that an inspection of the area can be made.</p>	<p>Required Operating Procedure 35</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Oil and gas infrastructure, including gravel pads, roads, airstrips, wells and production facilities, would be removed and the land restored on an ongoing basis, starting as soon as possible after extraction is completed. b. Before final abandonment, land used for oil and gas infrastructure—including well pads, production facilities, access roads, and airstrips—would be reclaimed to ensure eventual restoration of ecosystem function and to restore general wilderness characteristics. The leaseholder would develop and implement a BLM and USFWS-approved abandonment and reclamation plan. The plan would describe short-term stability, visual, hydrological, and productivity objectives and steps to be taken to ensure timely ecosystem restoration to the land’s previous hydrological, vegetation, and habitat condition, wild and scenic river (WSR) eligibility/suitability, and intent to restore general wilderness characteristics of the area. The BLM Authorized Officer may grant exceptions to satisfy stated environmental or public purposes. c. Reclamation shall include but not be limited to: <ul style="list-style-type: none"> i. Saving and properly maintaining topsoil to ensure seed source remains viable of topsoil for final application after reshaping of disturbed areas have been completed; ii. Adequate and approved measures to control erosion, landslides, and water runoff; iii. Adequate and approved measures to isolate, remove, or control toxic materials, including soil testing where applicable; iv. Reshaping the area disturbed, application of viable topsoil, and revegetation of disturbed areas, where reasonably practicable; and v. Rehabilitation of fisheries and wildlife habitat. <p>When reclamation of each of the disturbed area has been completed, the Authorized Officer shall be notified so that an inspection of the area can be made.</p>	<p>Required Operating Procedure 35</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ul style="list-style-type: none"> a. Oil and gas infrastructure, including gravel pads, roads, airstrips, wells and production facilities, would be removed and the land reclaimed on an ongoing basis, starting as soon as possible after extraction is completed. b. Before final abandonment, land used for oil and gas infrastructure—including well pads, production facilities, access roads, and airstrips—would be reclaimed to ensure eventual restoration of ecosystem function and to restore general wilderness characteristics. The leaseholder would develop and implement a BLM and USFWS-approved abandonment and reclamation plan which would be provided to the NSB upon request. The plan would describe short-term stability, visual, hydrological, and productivity objectives and steps to be taken to ensure timely ecosystem restoration to the land’s previous hydrological, vegetation, and habitat condition, wild and scenic river (WSR) eligibility/suitability, and intent to restore general wilderness characteristics of the area. The BLM Authorized Officer, in coordination with the USFWS, may grant exceptions to satisfy stated environmental or public purposes. c. Reclamation shall include but not be limited to: <ul style="list-style-type: none"> i. Saving and properly maintaining topsoil to ensure seed source remains viable of topsoil for final application after reshaping of disturbed areas have been completed; ii. Adequate and approved measures to control erosion, landslides, and water runoff; iii. Adequate and approved measures to isolate, remove, or control toxic materials, including soil testing where applicable; iv. Reshaping the area disturbed, application of viable topsoil, and revegetation of disturbed areas, where reasonably practicable; and v. Rehabilitation of fisheries and wildlife habitat. <p>When reclamation of each of the disturbed area has been completed, the BLM Authorized Officer in coordination with the USFWS shall be notified so that an inspection of the area can be made. The survey results would be provided to the NSB upon request.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
SUBSISTENCE CONSULTATION FOR PERMITTED ACTIVITIES			
<p>Required Operating Procedure 36</p> <p><u>Objective:</u> Provide opportunities for subsistence users to participate in planning and decision-making to prevent unreasonable conflicts between subsistence uses and other activities.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor would coordinate directly with affected communities, using the following guidelines:</p> <ol style="list-style-type: none"> a. Before submitting an application to the BLM, the applicant would work with directly affected subsistence communities, the Native Village of Kaktovik, NSB, and the North Slope and Eastern Interior Alaska Subsistence Regional Advisory Councils. They would discuss the siting, timing, and methods of their proposed operations to help discover local traditional and scientific knowledge. This is to minimize impacts on subsistence uses. Through this coordination, the applicant would make every reasonable effort, including such mechanisms as conflict avoidance agreements (CAAs) and mitigating measures, to ensure that proposed activities would not result in unreasonable interference with subsistence activities. In the event that no agreement is reached between the parties, the BLM Authorized Officer would work with the involved parties and determine which activities would occur, including the time frames. b. Applicants would submit documentation of coordination as part of operation plans to the North Slope and Eastern Interior Alaska Subsistence Regional Advisory Councils for review and comment. Applicants must allow time for the BLM to conduct formal government-to-government consultation with Native Tribal governments if the proposed action requires it. c. A plan would be developed that shows how the activity, in combination with other activities in the area, would be scheduled and located to prevent unreasonable conflicts with subsistence activities. The plan would also describe the methods used to monitor the effects of the activity on subsistence use. The plan would be submitted to the BLM Authorized Officer as part of the plan of operations. The plan would address the following items: <ol style="list-style-type: none"> i. A detailed description of the activities to take place (including the use of aircraft). ii. A description of how the applicant would minimize or address any potential impacts identified by the BLM Authorized Officer during the coordination process. iii. A detailed description of the monitoring to take place, including process, procedures, personnel involved, and points of contact both at the work site and in the local community. iv. Communication elements to provide information on how the applicant would keep potentially affected individuals and communities up-to-date on the progress of the activities and locations of possible, short-term conflicts (if any) with subsistence activities. 	<p>Required Operating Procedure 36</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 36</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor would coordinate directly with affected communities, using the following guidelines:</p> <ol style="list-style-type: none"> a. Before submitting an application to the BLM for exploration or development, the applicant would work with directly affected subsistence communities, the Native Village of Kaktovik, NSB, and the North Slope and Eastern Interior Alaska Subsistence Regional Advisory Councils in the development of a subsistence access plan. They would discuss access, siting, timing, and methods of their proposed operations to help discover local traditional and scientific knowledge. This is to minimize impacts on subsistence uses. Through this coordination, the applicant would make every reasonable effort, including such mechanisms as conflict avoidance agreements (CAAs) and mitigating measures, to ensure that proposed activities would not result in unreasonable interference with subsistence activities. In the event that no agreement is reached between the parties, the BLM Authorized Officer would work with the involved parties and determine which activities would occur, including the time frames. b. Applicants would submit documentation of coordination as part of operation plans to the North Slope and Eastern Interior Alaska Subsistence Regional Advisory Councils for review and comment. Applicants must allow time for the BLM to conduct formal government-to-government consultation with Native Tribal governments if the proposed action requires it. c. A plan would be developed that shows how the activity, in combination with other activities in the area, would be scheduled and located to prevent unreasonable conflicts with subsistence activities. The plan would also describe the methods used to monitor the effects of the activity on subsistence use. The plan would be submitted to the BLM Authorized Officer as part of the plan of operations. The plan would address the following items: <ol style="list-style-type: none"> i. A detailed description of the activities to take place (including the use of aircraft). ii. A description of how the applicant would minimize or address any potential impacts identified by the BLM Authorized Officer during the coordination process. iii. A detailed description of the monitoring to take place, including process, procedures, personnel involved, and points of contact both at the work site and in the local community. iv. Communication elements to provide information on how the applicant would keep potentially affected individuals and communities up-to-date on the progress of the activities and locations of possible, short-term conflicts (if any) with subsistence activities. Communication methods could include holding community open house meetings, workshops, newsletters, and radio and television announcements. 	<p>Required Operating Procedure 36</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> The lessee/operator/contractor would coordinate directly with affected communities, using the following guidelines:</p> <ol style="list-style-type: none"> a. Before submitting an application to the BLM for exploration or development, the applicant would work with directly affected subsistence communities, the Native Village of Kaktovik, NSB, and the North Slope and Eastern Interior Alaska Subsistence Regional Advisory Councils in the development of a subsistence access plan. They would discuss access, siting, timing, and methods of their proposed operations to help discover local traditional and scientific knowledge. This is to minimize impacts on subsistence uses. Through this coordination, the applicant would make every reasonable effort, including such mechanisms as conflict avoidance agreements (CAAs) and mitigating measures, to ensure that proposed activities would not result in unreasonable interference with subsistence activities. In the event that no agreement is reached between the parties, the BLM Authorized Officer in coordination with the USFWS would work with the involved parties and determine which activities would occur, including the time frames. b. Applicants would submit documentation of coordination as part of operation plans to the North Slope and Eastern Interior Alaska Subsistence Regional Advisory Councils for review and comment. Applicants must allow time for the BLM to conduct formal government-to-government consultation with Native Tribal governments if the proposed action requires it. c. A plan would be developed that shows how the activity, in combination with other activities in the area, would be scheduled and located to prevent unreasonable conflicts with subsistence activities. The plan would also describe the methods used to monitor the effects of the activity on subsistence use. The plan would be submitted to the BLM Authorized Officer in coordination with the USFWS as part of the plan of operations. The plan would address the following items: <ol style="list-style-type: none"> i. A detailed description of the activities to take place (including the use of aircraft). ii. A description of how the applicant would minimize or address any potential impacts identified by the BLM Authorized Officer and the USFWS during the coordination process. iii. A detailed description of the monitoring to take place, including process, procedures, personnel involved, and points of contact both at the work site and in the local community. iv. Communication elements to provide information on how the applicant would keep potentially affected individuals and communities up-to-date on the progress of the activities and locations of possible, short-term conflicts (if any) with subsistence activities. Communication methods could include holding community open house meetings, workshops, newsletters, and radio and television announcements. v. Procedures necessary to facilitate access by subsistence users to conduct their activities.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Communication methods could include holding community open house meetings, workshops, newsletters, and radio and television announcements.</p> <ul style="list-style-type: none"> v. Procedures necessary to facilitate access by subsistence users to conduct their activities. vi. Barge operators requiring a BLM permit are required to demonstrate that barging activities will not have unmitigable adverse impacts, as determined by NMFS, on the availability of marine mammals to subsistence hunters. vii. All operators of vessels over 50 feet in length engaged in operations requiring a BLM permit must have an automatic identification system transponder system on the vessel. <p>d. Permittees who propose transporting facilities, equipment, supplies, or other materials by barge to the Coastal Plain in support of oil and gas activities in the Arctic Refuge would notify and coordinate with the Alaska Eskimo Whaling Commission, the appropriate local community whaling captains' associations, and the NSB to minimize impacts from the proposed barging on subsistence whaling.</p> <p>e. For polar bears: Operators must minimize adverse impacts on the availability of polar bears for subsistence uses.</p> <ul style="list-style-type: none"> i. <i>Community consultation.</i> Applicants must consult with potentially affected communities and appropriate subsistence user organizations to discuss potential conflicts with subsistence polar bear hunting caused by the location, timing, and methods of operations and support activities. ii. <i>Plan of Cooperation (POC).</i> If conflicts arise, the applicant must address conflict avoidance issues through a POC, where an operator will be required to develop and implement a BLM and USFWS-approved POC. 	<p>(see above)</p>	<ul style="list-style-type: none"> v. Procedures necessary to facilitate access by subsistence users to conduct their activities. vi. Barge operators requiring a BLM permit would be required to demonstrate that barging activities would not have unmitigable adverse impacts, as determined by NMFS, on the availability of marine mammals to subsistence hunters. vii. All operators of vessels over 50 feet in length engaged in operations requiring a BLM permit must have an automatic identification system transponder system on the vessel. <p>d. Permittees who propose transporting facilities, equipment, supplies, or other materials by barge to the Coastal Plain in support of oil and gas activities in the Arctic Refuge would notify and coordinate with the Alaska Eskimo Whaling Commission, the appropriate local community whaling captains' associations, and the NSB to minimize impacts from the proposed barging on subsistence whaling.</p> <p>e. For polar bears: Operators must minimize adverse impacts on the availability of polar bears for subsistence uses.</p> <ul style="list-style-type: none"> i. <i>Community consultation.</i> Applicants must consult with potentially affected communities and appropriate subsistence user organizations to discuss potential conflicts with subsistence polar bear hunting caused by the location, timing, and methods of operations and support activities. ii. <i>Plan of Cooperation (POC).</i> If conflicts arise, the applicant must address conflict avoidance through the development and implementation of a BLM and USFWS-approved POC. 	<ul style="list-style-type: none"> vi. Barge operators requiring a BLM permit would be required to demonstrate that barging activities would not have unmitigable adverse impacts, as determined by NMFS, on the availability of marine mammals to subsistence hunters. vii. All operators of vessels over 50 feet in length engaged in operations requiring a BLM permit must have an automatic identification system transponder system on the vessel. <p>d. Permittees who propose transporting facilities, equipment, supplies, or other materials by barge to the Coastal Plain in support of oil and gas activities in the Arctic Refuge would notify and coordinate with the Alaska Eskimo Whaling Commission, the appropriate local community whaling captains' associations, and the NSB to minimize impacts from the proposed barging on subsistence whaling.</p> <p>e. For polar bears: Operators must minimize adverse impacts on the availability of polar bears for subsistence uses.</p> <ul style="list-style-type: none"> i. <i>Community consultation.</i> Applicants must consult with potentially affected communities and appropriate subsistence user organizations to discuss potential conflicts with subsistence polar bear hunting caused by the location, timing, and methods of operations and support activities. ii. <i>Plan of Cooperation (POC).</i> If conflicts arise, the applicant must address conflict avoidance through the development and implementation of a BLM and USFWS-approved POC.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 37</p> <p><u>Objective:</u> Avoid conflicts between subsistence activities and seismic exploration.</p> <p><u>Requirement/Standard:</u> In addition to the coordination process described in ROP 36 for permitted activities, before seismic exploration begins, applicants would notify the local search and rescue organizations in proposed seismic survey locations for that operational season. For the purpose of this standard, a potentially affected cabin or campsite is defined as one used for subsistence purposes and located within the boundary of the area subject to proposed geophysical exploration or within 1 mile of actual or planned travel routes used to supply the seismic operations.</p> <ul style="list-style-type: none"> a. Because of the large land area covered by typical geophysical operations and the potential to affect a large number of subsistence users during the exploration season, the permittee/operator would notify all potentially affected subsistence use cabin and campsite users. b. The official recognized list of subsistence users of cabins and campsites is the NSB’s most current inventory of cabins and campsites, which have been identified by the subsistence users’ names. c. A copy of the notification letter, a map of the proposed exploration area, and the list of potentially affected users would also be provided to the office of the appropriate Native Tribal government. d. The BLM Authorized Officer would prohibit seismic work within 1 mile of any known subsistence use cabin or campsite, unless an alternate agreement between the owner or user is reached through the consultation process and presented to the BLM Authorized Officer. e. Each week, the permittee would notify the appropriate local search and rescue of the operational location in the Coastal Plain. This notification would include a map indicating the extent of surface use and occupation, as well as areas previously used or occupied during the operation. The purpose of this notification is to give hunters up-to-date information regarding where seismic exploration is occurring and has occurred, so that they can plan their hunting trips and access routes accordingly. A list of the appropriate search and rescue offices to be contacted can be obtained from the coordinator of the North Slope and Eastern Interior Alaska Subsistence Regional Advisory Councils in the BLM’s Arctic District Office. 	<p>Required Operating Procedure 37</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 37</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 37</p> <p>Same as Alternative B.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 38</p> <p><u>Objective:</u> Minimize impacts from non-local hunting, trapping, and fishing activities on subsistence resources.</p> <p><u>Requirement/Standard:</u> Hunting, trapping, and fishing by lessees/operators/contractors would be prohibited when persons are on work status. This is defined as the period during which an individual is under the control and supervision of an employer. Work status is terminated when workers' shifts ends, and they return to a public airport or community (e.g., Kaktovik, Utqiagvik, or Deadhorse). Use of operator/permittee facilities, equipment, or transport for personnel access or aid in hunting, trapping, and fishing would be prohibited.</p>	<p>Required Operating Procedure 38</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 38</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 38</p> <p>Same as Alternative B.</p>
<p>Required Operating Procedure 39</p> <p><u>Objective:</u> Prevent disruption of subsistence use and access.</p> <p><u>Requirement/Standard:</u> Before starting exploration or development, lessees/operators/contractors are required to develop a subsistence access plan, in coordination with the Native Village of Kaktovik and the City of Kaktovik, to be approved by the BLM Authorized Officer.</p>	<p>Required Operating Procedure 39</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 39</p> <p>See ROP 36.</p>	<p>Required Operating Procedure 39</p> <p>See ROP 36.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
ORIENTATION PROGRAMS ASSOCIATED WITH PERMITTED ACTIVITIES			
<p>Required Operating Procedure 40</p> <p><u>Objective:</u> Minimize cultural and resource conflicts.</p> <p><u>Requirement/Standard:</u> All personnel involved in oil and gas and related activities would be provided with information concerning applicable lease stipulations, ROPs, standards, and specific types of environmental, social, traditional, and cultural concerns that relate to the region. The operator would ensure that all personnel involved in permitted activities would attend an orientation program at least once a year. The proposed orientation program would be submitted to the BLM Authorized Officer for review and approval and would accomplish the following:</p> <ol style="list-style-type: none"> Provide sufficient detail to notify personnel of applicable lease stipulations and ROPs and to inform individuals working on the project of specific types of environmental, social, traditional, and cultural concerns that relate to the region. Address the importance of not disturbing archaeological and biological resources and habitats, including endangered species, fisheries, bird colonies, and marine mammals, and provide guidance on how to avoid disturbance, including on the preparation, production, and distribution of information cards on endangered or threatened species. Be designed to increase sensitivity and understanding of personnel to community values, customs, and lifestyles in areas in which personnel would be operating. Include information concerning avoidance of conflicts with subsistence and pertinent mitigation. Include information for aircraft personnel concerning subsistence activities and areas and seasons that are particularly sensitive to disturbance by low-flying aircraft; of special concern is aircraft use near traditional subsistence cabins and campsites, flights during spring goose hunting and fall caribou and moose hunting seasons, and flights near potentially affected communities. Provide that individual training is transferable from one facility to another, except for elements of the training specific to a site. Include on-site records of all personnel who attend the program for so long as the site is active, though not to exceed the 5 most recent years of operations; this record would include the name and dates of attendance of each attendee. Include a module discussing bear interaction plans to minimize conflicts between bears and humans. Provide a copy of 43 CFR 3163 regarding noncompliance assessment and penalties to on-site personnel. Include training designed to ensure strict compliance with local and corporate drug and alcohol policies; this training would be offered to the NSB Health Department for review and comment. Include employee training on how to prevent transmission of communicable diseases, including sexually transmitted diseases, to the local communities; this training would be offered to the NSB Health Department for review and comment. 	<p>Required Operating Procedure 40</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 40</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> All personnel involved in oil and gas and related activities would be provided with information concerning applicable lease stipulations, ROPs, standards, and specific types of environmental, social, traditional, and cultural concerns that relate to the region. The operator would ensure that at least once each year, all personnel involved in permitted activities would attend an orientation program designed in coordination with local traditional knowledge holders. The proposed orientation program would be submitted to the BLM Authorized Officer for review and approval and would accomplish the following:</p> <ol style="list-style-type: none"> Provide sufficient detail to notify personnel of applicable lease stipulations and ROPs and to inform individuals working on the project of specific types of environmental, social, traditional, and cultural concerns that relate to the region. Address the importance of not disturbing archaeological, paleontological, and biological resources and habitats, including endangered species, fisheries, bird colonies, and marine mammals, and provide guidance on how to avoid disturbance, including on the preparation, production, and distribution of information cards on endangered or threatened species. Be designed to increase personnel's sensitivity and understanding of community values, customs, and lifestyles in areas in which personnel would be operating. Include information concerning avoidance of conflicts with subsistence and pertinent mitigation. Include information for aircraft personnel concerning subsistence activities and areas and seasons that are particularly sensitive to disturbance by low-flying aircraft; of special concern is aircraft use near traditional subsistence cabins and campsites, flights during spring goose hunting and fall caribou and moose hunting seasons, and flights near potentially affected communities. Provide that individual training would be transferable from one facility to another, except for elements of the training specific to a site. Include on-site records of all personnel who attend the program for so long as the site is active, though not to exceed the 5 most recent years of operations; this record would include the name and dates of attendance of each attendee. Include a module discussing bear interaction plans to minimize conflicts between bears and humans. Provide a copy of 43 CFR 3163 regarding noncompliance assessment and penalties to on-site personnel. Include training designed to ensure strict compliance with local and corporate drug and alcohol policies; this training would be offered to the NSB Health Department for review and comment. Include employee training on how to prevent transmission of communicable diseases, including sexually transmitted diseases, to the local communities; this training would be offered to the NSB Health Department for review and comment. 	<p>Required Operating Procedure 40</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> All personnel involved in oil and gas and related activities would be provided with information concerning applicable lease stipulations, ROPs, standards, and specific types of environmental, social, traditional, and cultural concerns that relate to the region. The operator would ensure that at least once each year, all personnel involved in permitted activities would attend an orientation program designed in coordination with local traditional knowledge holders. The proposed orientation program would be submitted to the BLM Authorized Officer in coordination with the USFWS for review and approval and would accomplish the following:</p> <ol style="list-style-type: none"> Provide sufficient detail to notify personnel of applicable lease stipulations and ROPs and to inform individuals working on the project of specific types of environmental, social, traditional, and cultural concerns that relate to the region. Address the importance of not disturbing archaeological, paleontological, and biological resources and habitats, including endangered species, fisheries, bird colonies, and marine mammals, and provide guidance on how to avoid disturbance, including on the preparation, production, and distribution of information cards on endangered or threatened species. Be designed to increase personnel's sensitivity and understanding of community values, customs, and lifestyles in areas in which personnel would be operating. Include information concerning avoidance of conflicts with subsistence and pertinent mitigation. Include information for aircraft personnel concerning subsistence activities and areas and seasons that are particularly sensitive to disturbance by low-flying aircraft; of special concern is aircraft use near traditional subsistence cabins and campsites, flights during spring goose hunting and fall caribou and moose hunting seasons, and flights near potentially affected communities. Provide that individual training would be transferable from one facility to another, except for elements of the training specific to a site. Include on-site records of all personnel who attend the program for so long as the site is active, though not to exceed the 5 most recent years of operations; this record would include the name and dates of attendance of each attendee. Include a module discussing bear interaction plans to minimize conflicts between bears and humans. Provide a copy of 43 CFR 3163 regarding noncompliance assessment and penalties to on-site personnel. Include training designed to ensure strict compliance with local and corporate drug and alcohol policies; this training would be offered to the NSB Health Department for review and comment. Include employee training on how to prevent transmission of communicable diseases, including sexually transmitted diseases, to the local communities; this training would be offered to the NSB Health Department for review and comment.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>In order to limit disturbance around known polar bear dens:</p> <p><i>Monitoring requirements.</i></p> <ul style="list-style-type: none"> i. Develop and implement a site-specific, BLM and USFWS-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on polar bears, and the subsistence use of this species. ii. Provide trained, qualified, and BLM and USFWS-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iii. For offshore activities, provide trained, qualified, and BLM and USFWS-approved observers on board all operational and support vessels to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iv. Cooperate with the BLM and USFWS and other designated Federal, State, and local agencies to monitor the impacts of Industry activities on polar bears. Where information is insufficient to evaluate the potential effects of activities on polar bears, and the subsistence use of this species, operators may be required to participate in joint monitoring and/or research efforts to address these information needs and ensure the least practicable impact to these resources. <p><i>Reporting requirements.</i> Operators must report the results of monitoring and mitigation activities to the BLM and USFWS.</p> <ul style="list-style-type: none"> i. <i>In-season monitoring reports</i> <ul style="list-style-type: none"> 1) <i>Activity progress reports.</i> Notify the BLM and USFWS at least 48 hours prior to the onset of activities; provide the BLM and USFWS weekly progress reports of any significant changes in activities and/or locations; and notify the BLM and USFWS within 48 hours after ending of activities. 2) <i>Polar bear observation reports.</i> Report all observations of polar bears and potential polar bear dens, during any Industry activity. Information in the observation report must include, but is not limited to: (1) Date, time, and location of observation; (2) Number of bears; (3) Sex and age; (4) Observer name and contact information; (5) Weather, visibility, sea state, and sea-ice conditions at the time of observation; (6) Estimated closest distance of bears from personnel and facilities; (7) Industry activity at time of sighting; (8) Possible attractants present; (9) Bear behavior; (10) Description of the encounter; (11) Duration of the encounter; and (12) Mitigation actions taken. <p>Incident report. Report all bear incidents during any Industry activity. Reports must include: (1) All information specified for an observation report; (2) A complete detailed description of the incident; and (3) Any other actions taken.</p>	<p>(see above)</p>	<p>In order to limit disturbance around known polar bear dens:</p> <p><i>Monitoring requirements.</i></p> <ul style="list-style-type: none"> i. Develop and implement a site-specific, BLM and USFWS-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on polar bears, and the subsistence use of this species. ii. Provide trained, qualified, and BLM and USFWS-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iii. For offshore activities, provide trained, qualified, and BLM and USFWS-approved observers on board all operational and support vessels to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iv. Cooperate with the BLM and USFWS and other designated Federal, State, and local agencies to monitor the impacts of Industry activities on polar bears. Where information is insufficient to evaluate the potential effects of activities on polar bears, and the subsistence use of this species, operators may be required to participate in joint monitoring and/or research efforts to address these information needs and ensure the least practicable impact to these resources. <p><i>Reporting requirements.</i> Operators must report the results of monitoring and mitigation activities to the BLM and USFWS.</p> <ul style="list-style-type: none"> i. <i>In-season monitoring reports</i> <ul style="list-style-type: none"> 1) <i>Activity progress reports.</i> Notify the BLM and USFWS at least 48 hours prior to the onset of activities; provide the BLM and USFWS weekly progress reports of any significant changes in activities and/or locations; and notify the BLM and USFWS within 48 hours after ending of activities. 2) <i>Polar bear observation reports.</i> Report all observations of polar bears and potential polar bear dens, during any Industry activity. Information in the observation report must include, but is not limited to: (1) Date, time, and location of observation; (2) Number of bears; (3) Sex and age; (4) Observer name and contact information; (5) Weather, visibility, sea state, and sea-ice conditions at the time of observation; (6) Estimated closest distance of bears from personnel and facilities; (7) Industry activity at time of sighting; (8) Possible attractants present; (9) Bear behavior; (10) Description of the encounter; (11) Duration of the encounter; and (12) Mitigation actions taken. <p>Incident report. Report all bear incidents during any industry activity. Reports must include: (1) All information specified for an observation report; (2) A complete detailed description of the incident; and (3) Any other actions taken.</p>	<p>In order to limit disturbance around known polar bear dens:</p> <p><i>Monitoring requirements.</i></p> <ul style="list-style-type: none"> i. Develop and implement a site-specific, BLM and USFWS-approved marine mammal monitoring and mitigation plan to monitor and evaluate the effectiveness of mitigation measures and the effects of activities on polar bears, and the subsistence use of this species. ii. Provide trained, qualified, and BLM and USFWS-approved onsite observers to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iii. For offshore activities, provide trained, qualified, and BLM and USFWS-approved observers on board all operational and support vessels to carry out monitoring and mitigation activities identified in the marine mammal monitoring and mitigation plan. iv. Cooperate with the BLM and USFWS and other designated Federal, State, and local agencies to monitor the impacts of Industry activities on polar bears. Where information is insufficient to evaluate the potential effects of activities on polar bears, and the subsistence use of this species, operators may be required to participate in joint monitoring and/or research efforts to address these information needs and ensure the least practicable impact to these resources. <p><i>Reporting requirements.</i> Operators must report the results of monitoring and mitigation activities to the BLM and USFWS.</p> <ul style="list-style-type: none"> i. <i>In-season monitoring reports</i> <ul style="list-style-type: none"> 1) <i>Activity progress reports.</i> Notify the BLM and USFWS at least 48 hours prior to the onset of activities; provide the BLM and USFWS weekly progress reports of any significant changes in activities and/or locations; and notify the BLM and USFWS within 48 hours after ending of activities. 2) <i>Polar bear observation reports.</i> Report all observations of polar bears and potential polar bear dens, during any Industry activity. Information in the observation report must include, but is not limited to: (1) Date, time, and location of observation; (2) Number of bears; (3) Sex and age; (4) Observer name and contact information; (5) Weather, visibility, sea state, and sea-ice conditions at the time of observation; (6) Estimated closest distance of bears from personnel and facilities; (7) Industry activity at time of sighting; (8) Possible attractants present; (9) Bear behavior; (10) Description of the encounter; (11) Duration of the encounter; and (12) Mitigation actions taken. <p>Incident report. Report all bear incidents during any industry activity. Reports must include: (1) All information specified for an observation report; (2) A complete detailed description of the incident; and (3) Any other actions taken.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Final report. The results of monitoring and mitigation efforts identified in the marine mammal monitoring and mitigation plan must be submitted to the BLM and USFWS for review within 90 days of the expiration of an authorization. Information in the final report must include: (1) Copies of all observation reports submitted under an authorization; (2) A summary of the observation reports; (3) A summary of monitoring and mitigation efforts, including areas, total hours, total distances, and distribution; (4) Analysis of factors affecting the visibility and detectability of polar bears during monitoring; (5) Analysis of the effectiveness of mitigation measures; (6) Analysis of the distribution, abundance, and behavior of polar bears observed; and (7) Estimates of "take" as defined by the MMPA and its implementing regulations</p>	<p>(see above)</p>	<p><i>Final report.</i> The results of monitoring and mitigation efforts identified in the marine mammal monitoring and mitigation plan must be submitted to the BLM and USFWS for review within 90 days of the expiration of an authorization. Information in the final report must include: (1) Copies of all observation reports submitted under an authorization; (2) A summary of the observation reports; (3) A summary of monitoring and mitigation efforts, including areas, total hours, total distances, and distribution; (4) Analysis of factors affecting the visibility and detectability of polar bears during monitoring; (5) Analysis of the effectiveness of mitigation measures; (6) Analysis of the distribution, abundance, and behavior of polar bears observed; and (7) Estimates of "take" as defined by the MMPA and its implementing regulations</p>	<p><i>Final report.</i> The results of monitoring and mitigation efforts identified in the marine mammal monitoring and mitigation plan must be submitted to the BLM and USFWS for review within 90 days of the expiration of an authorization. Information in the final report must include: (1) Copies of all observation reports submitted under an authorization; (2) A summary of the observation reports; (3) A summary of monitoring and mitigation efforts, including areas, total hours, total distances, and distribution; (4) Analysis of factors affecting the visibility and detectability of polar bears during monitoring; (5) Analysis of the effectiveness of mitigation measures; (6) Analysis of the distribution, abundance, and behavior of polar bears observed; and (7) Estimates of "take" as defined by the MMPA and its implementing regulations</p>
SUMMER VEHICLE TUNDRA ACCESS			
<p>Required Operating Procedure 41</p> <p><u>Objective:</u> Protect stream banks and water quality; minimize compaction and displacement of soils; minimize the breakage, abrasion, compaction, or displacement of vegetation; protect cultural and paleontological resources; maintain populations of and adequate habitat for birds, fish, and caribou and other terrestrial mammals; and minimize impacts on subsistence activities.</p> <p><u>Requirement/Standard:</u> On a case-by-case basis, the BLM Authorized Officer, in consultation with the USFWS, may permit low-ground-pressure vehicles to travel off gravel pads and roads during times other than those identified in ROP 11. Permission for such use would be granted only after an applicant has completed the following:</p> <ol style="list-style-type: none"> Submitted studies satisfactory to the BLM Authorized Officer of the impacts on soils and vegetation of the specific low-ground-pressure vehicles to be used; these studies would reflect use of such vehicles under conditions like those of the route proposed and would demonstrate that the proposed use would have no more than minimal impacts on soils and vegetation. Alternatively, the most current list of summer off-road vehicles approved by the State may be used to fulfill this requirement. Submitted surveys satisfactory to the BLM Authorized Officer of subsistence uses of the area as well as of the soils, vegetation, hydrology, wildlife, and fish (and their habitats), paleontological and archaeological resources, and other resources, as required by the BLM Authorized Officer. Designed or modified the use proposal to minimize impacts to the BLM Authorized Officer's satisfaction; design steps to achieve the objectives and based on the studies and surveys may include timing restrictions (generally it is considered inadvisable to conduct tundra travel before August 1 to protect ground-nesting birds), shifting work to winter, rerouting, and not proceeding when certain wildlife are present or subsistence activities are occurring 	<p>Required Operating Procedure 41</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 41</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u> On a case-by-case basis, the BLM Authorized Officer, in consultation with the USFWS and appropriate Tribal Governments, may permit low-ground-pressure vehicles to travel off gravel pads and roads during times other than those identified in ROP 11. Permission for such use would be granted only after an applicant has completed the following:</p> <ol style="list-style-type: none"> Submitted studies of the impacts on soils and vegetation of the low-ground-pressure vehicle(s) as equipped. The AK-DNR off-road tundra vehicle certification qualifies as an acceptable study. Other studies satisfactory to both the BLM Authorized Officer and the USFWS would also be considered. These studies would reflect use of such vehicles under conditions like those of the route proposed and would demonstrate that the proposed use would have no more than minimal impacts on soils and vegetation. Alternatively, the most current list of summer off-road vehicles approved by the State may be used to fulfill this requirement. Submitted surveys satisfactory to the BLM Authorized Officer and USFWS, in coordination with the local community, of subsistence uses of the area as well as of the soils, vegetation, hydrology, wildlife, and fish (and their habitats), paleontological and archaeological resources, and other resources, as required by the BLM Authorized Officer. Designed or modified the use proposal to minimize impacts to the satisfaction of the BLM Authorized Officer and the USFWS; design steps to achieve the objectives and based on the studies and surveys may include timing restrictions (generally it is considered inadvisable to conduct tundra travel before August 1 to protect ground-nesting birds), shifting work to winter, rerouting, and not proceeding when certain wildlife are present or subsistence activities are occurring. 	<p>Required Operating Procedure 41</p> <p><u>Objective:</u> Same as Alternative B. Minimize potential for degrading bluff line impacts along stream banks that provide polar bear denning habitat.</p> <p><u>Requirement/Standard:</u> On a case-by-case basis, the BLM Authorized Officer, in coordination with the USFWS and appropriate Tribal Governments, may permit low-ground-pressure vehicles to travel off gravel pads and roads during times other than those identified in ROP 11. Permission for such use would be granted only after an applicant has completed the following:</p> <ol style="list-style-type: none"> Submitted studies of the impacts on soils and vegetation of the low-ground-pressure vehicle(s) as equipped. The AK-DNR off-road tundra vehicle certification qualifies as an acceptable study. Other studies satisfactory to both the BLM Authorized Officer and the USFWS would also be considered. These studies would reflect use of such vehicles under conditions like those of the route proposed and would demonstrate that the proposed use would have no more than minimal impacts on soils and vegetation. Alternatively, the most current list of summer off-road vehicles approved by the State may be used to fulfill this requirement. Submitted surveys satisfactory to the BLM Authorized Officer and USFWS, in coordination with the local community, of subsistence uses of the area as well as of the soils, vegetation, hydrology, wildlife, and fish (and their habitats), paleontological and archaeological resources, and other resources, as required by the BLM Authorized Officer. Designed or modified the use proposal to minimize impacts to the satisfaction of the BLM Authorized Officer and the USFWS; design steps to achieve the objectives and based on the studies and surveys may include timing restrictions (generally it is considered inadvisable to conduct tundra travel before August 1 to protect ground-nesting birds), shifting work to winter, rerouting, and not proceeding when certain wildlife are present or subsistence activities are occurring.

Alternative B	Alternative C	Alternative D	Alternative D2
GENERAL WILDLIFE AND HABITAT PROTECTION			
<p>Required Operating Procedure 42</p> <p><u>Objective:</u> Minimize disturbance of wildlife or alteration and hinderance of wildlife movements through the Coastal Plain.</p> <p><u>Requirement/Standard:</u></p> <ol style="list-style-type: none"> Following wildlife with ground vehicles or aircraft is prohibited. Particular attention would be given to avoid disturbing caribou. Avoid and minimize the disturbance to loafing and nesting birds to the extent practicable. 	<p>Required Operating Procedure 42</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 42</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ol style="list-style-type: none"> Prior to vehicle use, the lessee/operator/contractor would consult with BLM, USFWS, and Tribal Governments to consider and understand vehicle caused disturbance of wildlife or alteration and hinderance of wildlife movements throughout the Coastal Plain. BLM, USFWS, and Tribal Governments would review and request changes to lessee/operator/contractor operations to minimize disturbance. Following wildlife with ground vehicles or aircraft is prohibited. Particular attention would be given to avoid disturbing caribou and polar bears. Avoid and minimize the disturbance to loafing, brood-rearing and nesting birds to the extent practicable. <p>Also see ROP 34.</p>	<p>Required Operating Procedure 42</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ol style="list-style-type: none"> Prior to vehicle use, the lessee/operator/contractor would consult with BLM, USFWS, and Tribal Governments to consider and understand vehicle caused disturbance of wildlife or alteration and hinderance of wildlife movements throughout the Coastal Plain. BLM, USFWS, and Tribal Governments would review and request changes to lessee/operator/contractor operations to minimize disturbance. Following wildlife with ground vehicles or aircraft is prohibited. Particular attention would be given to avoid disturbing caribou and polar bears. Avoid and minimize the disturbance to loafing, brood-rearing and nesting birds to the extent practicable. <p>Also see ROP 34.</p>
<p>Required Operating Procedure 43</p> <p><u>Objective:</u> Prevent the introduction or spread of nonnative, invasive species in the Coastal Plain.</p> <p><u>Requirement/Standard:</u></p> <ol style="list-style-type: none"> Certify that all equipment, supplies (including gravel, lumber, erosion control material), and vehicles (including helicopters, planes, boats, off-road vehicles, trucks, tracked vehicles, and barges) intended for use either off or on roads are free of invasive species before transiting into the Coastal Plain. Survey annually along roads, drilling platforms, and barge access points for invasive species and begin effective eradication measures on evidence of their introduction. Before beginning operations into the Coastal Plain, submit a plan, for BLM approval, detailing the methods for: 1) cleaning equipment, supplies, and vehicles, including off-site disposal of cleaning fluids or materials and detected organisms, and 2) early detection surveys, and eradication response measures (including post treatment monitoring) for all invasive species, noxious plants and animals, and weeds. 	<p>Required Operating Procedure 43</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 43</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ol style="list-style-type: none"> Ensure that all equipment, supplies (including gravel, lumber, erosion control material), and vehicles (including helicopters, planes, boats, off-road vehicles, trucks, tracked vehicles, and barges) intended for use are free of invasive species, such as but not limited to BLM priority invasive plants as defined in BLM Instructional Memorandum (IM) 2022-008 (or current version of the related policy IM) and invasive vertebrates and invertebrates, before transiting into the Coastal Plain. Standard stipulations for invasive species management shall be required as applicable by permitted activities (BLM IM 2022-08, Attachment 1). Survey annually along roads, drilling platforms, and barge access points for invasive species and begin effective eradication measures on evidence of their introduction. Before beginning operations into the Coastal Plain, submit a plan, for BLM approval, detailing the methods for: 1) cleaning equipment, supplies, and vehicles, including off-site disposal of cleaning fluids or materials and detected organisms, and 2) early detection surveys, and eradication response measures (including post treatment monitoring) for all invasive species, noxious plants and animals, and weeds. 	<p>Required Operating Procedure 43</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <ol style="list-style-type: none"> Ensure that all equipment, supplies (including gravel, lumber, erosion control material), and vehicles (including helicopters, planes, boats, off-road vehicles, trucks, tracked vehicles, and barges) intended for use are free of invasive species, such as but not limited to BLM priority invasive plants as defined in BLM Instructional Memorandum (IM) 2022-008 (or current version of the related policy IM) and invasive vertebrates and invertebrates, before transiting into the Coastal Plain. Standard stipulations for invasive species management shall be required as applicable by permitted activities (BLM IM 2022-08, Attachment 1). Survey annually along roads, drilling platforms, and barge access points for invasive species and begin effective eradication measures on evidence of their introduction. Before beginning operations into the Coastal Plain, submit a plan, for BLM approval, detailing the methods for: 1) cleaning equipment, supplies, and vehicles, including off-site disposal of cleaning fluids or materials and detected organisms, and 2) early detection surveys, and eradication response measures (including post treatment monitoring) for all invasive species, noxious plants and animals, and weeds.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>Required Operating Procedure 44</p> <p><u>Objective:</u> Minimize loss of populations and habitat for plant species designated as sensitive by the BLM in Alaska.</p> <p><u>Requirement/Standard:</u> If a development is proposed in an area that provides potential habitat for a BLM sensitive plant species, the development proponent would conduct surveys at appropriate times of the summer season and in appropriate habitats for the sensitive plant species. The results of these surveys and plans to minimize impacts would be submitted to the BLM with the application for development.</p>	<p>Required Operating Procedure 44</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 44</p> <p><u>Objective:</u> Minimize loss of populations and habitat for plant species designated as sensitive by the BLM and USFWS Refuge Resources of Concern in Alaska.</p> <p><u>Requirement/Standard:</u> If a development is proposed in an area that provides potential habitat for a BLM sensitive plant species and USFWS Refuge Resources of Concern, the development proponent would conduct surveys at appropriate times of the summer season and in appropriate habitats for the sensitive plant species. The results of these surveys and plans to minimize impacts would be submitted to the BLM with the application for development.</p>	<p>Required Operating Procedure 44</p> <p><u>Objective:</u> Minimize loss of populations and habitat for plant species designated as sensitive by the BLM and USFWS Refuge Resources of Concern in Alaska.</p> <p><u>Requirement/Standard:</u> If a development is proposed in an area that provides potential habitat for a BLM sensitive plant species and USFWS Refuge Resources of Concern, the development proponent, in coordination with local traditional knowledge holders, and/or the NSB, would conduct surveys at appropriate times of the summer season and in appropriate habitats for the sensitive plant species. The results of these surveys and plans to minimize impacts would be submitted to the BLM with the application for development.</p>
<p>Required Operating Procedure 45</p> <p><u>Objective:</u> Minimize loss of individuals and habitat for mammalian, avian, fish, and invertebrate species designated as sensitive by the BLM in Alaska.</p> <p><u>Requirement/Standard:</u> If a development is proposed in an area that provides potential habitat for BLM sensitive species, the development proponent would conduct surveys at appropriate times of the year and in appropriate habitats to detect the presence of BLM sensitive species. The results of these surveys and plans to minimize impacts would be submitted to the BLM with the application for development.</p>	<p>Required Operating Procedure 45</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 45</p> <p><u>Objective:</u> Minimize loss of individuals, populations, and habitat for species designated as sensitive by the BLM in Alaska and as USFWS Refuge Resources of Concern.</p> <p><u>Requirement/Standard:</u> If a development is proposed in an area that provides potential habitat for BLM sensitive species and USFWS Refuge Resources of Concern, the development proponent would conduct surveys at appropriate times of the year and in appropriate habitats to detect the presence of BLM sensitive species and the USFWS Refuge Resources of Concern. The results of these surveys and plans to minimize impacts would be submitted to the BLM with the application for development.</p>	<p>Required Operating Procedure 45</p> <p><u>Objective:</u> Minimize loss of individuals, populations, and habitat for species designated as sensitive by the BLM in Alaska and as USFWS Refuge Resources of Concern.</p> <p><u>Requirement/Standard:</u> If a development is proposed in an area that provides potential habitat for BLM sensitive species and USFWS Refuge Resources of Concern, the development proponent, in coordination with local traditional knowledge holders, and/or the NSB, would conduct surveys at appropriate times of the year and in appropriate habitats to detect the presence of BLM sensitive species and the USFWS Refuge Resources of Concern. The results of these surveys and plans to minimize impacts would be submitted to the BLM with the application for development.</p>

Alternative B	Alternative C	Alternative D	Alternative D2
MARINE VESSEL TRAFFIC-ASSOCIATED ACTIVITIES			
<p>Required Operating Procedure 46</p> <p><u>Objective:</u> Minimize impacts on marine mammals from vessel traffic.</p> <p><u>Requirement/Standard:</u></p> <p>General Vessel Traffic</p> <ol style="list-style-type: none"> Operational and support vessels would be staffed with dedicated PSOs to alert crew of the presence of marine mammals and to initiate adaptive mitigation responses. When weather conditions require, such as when visibility drops, support vessel operators must reduce speed and change direction, as necessary (and as operationally practicable), to avoid the likelihood of injuring marine mammals. The transit of operational and support vessels is not authorized before July 1. This operating condition is intended to allow marine mammals the opportunity to disperse from the confines of the spring lead system and minimize interactions with subsistence hunters. Exemption waivers to this operating condition may be issued by the NMFS and USFWS on a case-by-case basis, based on a review of seasonal ice conditions and available information on marine mammal distributions in the area of interest. Vessels may not be operated in such a way as to separate members of a group of marine mammals from other members of the group. Operators should take reasonable steps to alert other vessel operators in the vicinity of marine mammals. Operators should report any dead or injured listed marine mammals to NMFS and the BLM and USFWS. Vessels will not allow tow lines to remain in the water when not towing, all closed loops will be cut, and all trash will be retained on board for disposal in secure landfills, thereby reducing the potential for marine mammal entanglement. The lessees will implement measures to minimize risk of spilling hazardous substances. These measures will include: avoiding operation of watercraft in the presence of sea ice to the extent practicable and using fully operational vessel navigation systems composed of radar, chartplotter, sonar, marine communication systems, and satellite navigation receivers, as well as Automatic Identification System for vessel tracking. <p>Vessels in Vicinity of Whales</p> <ol style="list-style-type: none"> Vessel operators would avoid groups of three or more whales by staying at least 1 mile away. A group is defined as being three or more whales observed within a 1,641-foot (500 meter) area and displaying behaviors of directed or coordinated activity (e.g., group feeding). All boat and barge traffic will be scheduled to avoid periods when bowhead whales are migrating through the area. Boat, hovercraft, barge, and aircraft will remain at least 12 miles from Cross Island during the bowhead whale subsistence hunting consistent with the CAA. 	<p>Required Operating Procedure 46</p> <p>Same as Alternative B.</p>	<p>Required Operating Procedure 46</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>General Vessel Traffic</p> <ol style="list-style-type: none"> Operational and support vessels would be staffed with dedicated PSOs, hired locally whenever possible, to alert crew of the presence of marine mammals and to initiate adaptive mitigation responses. When weather conditions require, such as when visibility drops, support vessel operators must reduce speed and change direction, as necessary (and as operationally practicable), to avoid the likelihood of injuring marine mammals. The transit of operational and support vessels is not authorized before July 1. This operating condition is intended to allow marine mammals the opportunity to disperse from the confines of the spring lead system and minimize interactions with subsistence hunters. Exemption waivers to this operating condition may be issued by the NMFS and USFWS, in coordination with local Tribal governments, on a case-by-case basis, based on a review of seasonal ice conditions and available information on marine mammal distributions in the area of interest. Vessels may not be operated in such a way as to separate members of a group of marine mammals from other members of the group. Operators should take reasonable steps to alert other vessel operators in the vicinity of marine mammals. Operators should report any dead or injured listed marine mammals to NMFS and the BLM and USFWS. Vessels will not allow tow lines to remain in the water when not towing, all closed loops will be cut, and all trash will be retained on board for disposal in secure landfills, thereby reducing the potential for marine mammal entanglement. The lessees will implement measures to minimize risk of spilling hazardous substances. These measures will include: avoiding operation of watercraft in the presence of sea ice to the extent practicable and using fully operational vessel navigation systems composed of radar, chartplotter, sonar, marine communication systems, and satellite navigation receivers, as well as Automatic Identification System for vessel tracking. <p>Vessels in Vicinity of Whales</p> <ol style="list-style-type: none"> Vessel operators would avoid groups of three or more whales by staying at least 1 mile away. A group is defined as being three or more whales observed within a 1,641-foot (500 meter) area and displaying behaviors of directed or coordinated activity (e.g., group feeding). All boat and barge traffic will be scheduled to avoid periods when bowhead whales are migrating through the area. Boat, hovercraft, barge, and aircraft will remain at least 12 miles from Cross Island during the bowhead whale subsistence hunting consistent with the CAA. 	<p>Required Operating Procedure 46</p> <p><u>Objective:</u> Same as Alternative B.</p> <p><u>Requirement/Standard:</u></p> <p>General Vessel Traffic</p> <ol style="list-style-type: none"> Operational and support vessels would be staffed with dedicated PSOs, hired locally whenever possible, to alert crew of the presence of marine mammals and to initiate adaptive mitigation responses. When weather conditions require, such as when visibility drops, support vessel operators must reduce speed and change direction, as necessary (and as operationally practicable), to avoid the likelihood of injuring marine mammals. The transit of operational and support vessels is not authorized before July 1. This operating condition is intended to allow marine mammals the opportunity to disperse from the confines of the spring lead system and minimize interactions with subsistence hunters. Exemption waivers to this operating condition may be issued by the NMFS and USFWS, in coordination with local Tribal governments, on a case-by-case basis, based on a review of seasonal ice conditions and available information on marine mammal distributions in the area of interest. Vessels may not be operated in such a way as to separate members of a group of marine mammals from other members of the group. Operators should take reasonable steps to alert other vessel operators in the vicinity of marine mammals. Operators should report any dead or injured listed marine mammals to NMFS and the BLM and USFWS. Vessels will not allow tow lines to remain in the water when not towing, all closed loops will be cut, and all trash will be retained on board for disposal in secure landfills, thereby reducing the potential for marine mammal entanglement. The lessees will implement measures to minimize risk of spilling hazardous substances. These measures will include: avoiding operation of watercraft in the presence of sea ice to the extent practicable and using fully operational vessel navigation systems composed of radar, chartplotter, sonar, marine communication systems, and satellite navigation receivers, as well as Automatic Identification System for vessel tracking. <p>Vessels in Vicinity of Whales</p> <ol style="list-style-type: none"> Vessel operators would avoid groups of three or more whales by staying at least 1 mile away. A group is defined as being three or more whales observed within a 1,641-foot (500 meter) area and displaying behaviors of directed or coordinated activity (e.g., group feeding). Lessees will coordinate with the Alaska Eskimo Whaling Commission to enter into a Conflict Avoidance Agreement such that vessel activities do not occur during sensitive whaling periods. All boat and barge traffic will be scheduled to avoid periods when bowhead whales are migrating through the area. Boat, hovercraft, barge, and aircraft will remain at least 12 miles from Cross Island during the bowhead whale subsistence hunting consistent with the CAA.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>c. The transit of operational and support vessels through the North Slope region is not authorized prior to July 1. This operating condition is intended to allow marine mammals the opportunity to disperse from the confines of the spring lead system and minimize interactions with subsistence hunters. Exemption waivers to this operating condition may be issued by NMFS on a case-by-case basis, based upon a review of seasonal ice conditions and available information on marine mammal distributions in the area of interest.</p> <p>d. If the vessel approaches within 1 mile of observed whales, except when providing emergency assistance to whalers or in other emergency situations, the operator would take reasonable precautions to avoid potential interaction with the whales by taking one or more of the following actions, as appropriate:</p> <ul style="list-style-type: none"> i. Reducing vessel speed to less than 5 knots within 900 feet of the whale ii. Steering around the whale if possible iii. Operating the vessel to avoid causing a whale to make multiple changes in direction, avoiding sudden or multiple course changes iv. Checking the waters around the vessel to ensure that no whales are within 164 feet of the vessel prior to engaging the propellers v. Reducing vessel speed to 9 knots or less when weather conditions reduce visibility to avoid the likelihood of injury to whales vi. Vessels shall not exceed speeds of 10 knots in order to reduce potential whale strikes vii. If a whale approaches the vessel and if maritime conditions safely allow, the engine will be put in neutral and the whale will be allowed to pass beyond the vessel. If the vessel is taken out of gear, vessel crew will ensure that no whales are within 50 m of the vessel when propellers are re-engaged, thus minimizing risk of marine mammal injury. <p>e. Vessels will stay at least 984 feet away from cow-calf pairs, feeding aggregations, or whales that are engaged in breeding behavior. If the vessel is approached by cow-calf pairs, it will remain out of gear as long as whales are within 984 feet of the vessel (consistent with safe operations)</p> <p>f. Consistent with NMFS marine mammal viewing guidelines (https://alaskafisheries.noaa.gov/pr/mm-viewing-guide), operators of vessels will, at all times, avoid approaching marine mammals within 300 feet. Operators will observe direction of travel and attempt to maintain a distance of 300 feet or greater between the animal and the vessel by working to alter course or slowing the vessel.</p> <p>g. Special consideration of North Pacific right whale and their critical habitat:</p> <ul style="list-style-type: none"> i. Vessel operators will avoid transit through North Pacific right whale critical habitat. If such transit cannot be avoided, operators must post a dedicated PSO on the bridge and reduce speed to 10 knots while in the North Pacific right whale critical habitat. Alternatively, vessels may transit at no more than 5 knots without the need for a dedicated PSO. 	<p>(see above)</p>	<p>c. The transit of operational and support vessels through the North Slope region is not authorized prior to July 1. This operating condition is intended to allow marine mammals the opportunity to disperse from the confines of the spring lead system and minimize interactions with subsistence hunters. Exemption waivers to this operating condition may be issued by NMFS on a case-by-case basis, based upon a review of seasonal ice conditions and available information on marine mammal distributions in the area of interest.</p> <p>d. If the vessel approaches within 1 mile of observed whales, except when providing emergency assistance to whalers or in other emergency situations, the operator would take reasonable precautions to avoid potential interaction with the whales by taking one or more of the following actions, as appropriate:</p> <ul style="list-style-type: none"> i. Reducing vessel speed to less than 5 knots within 900 feet of the whale ii. Steering around the whale if possible iii. Operating the vessel to avoid causing a whale to make multiple changes in direction, avoiding sudden or multiple course changes iv. Checking the waters around the vessel to ensure that no whales are within 164 feet of the vessel prior to engaging the propellers v. Reducing vessel speed to 9 knots or less when weather conditions reduce visibility to avoid the likelihood of injury to whales vi. Vessels shall not exceed speeds of 10 knots in order to reduce potential whale strikes vii. If a whale approaches the vessel and if maritime conditions safely allow, the engine will be put in neutral and the whale will be allowed to pass beyond the vessel. If the vessel is taken out of gear, vessel crew will ensure that no whales are within 50 m of the vessel when propellers are re-engaged, thus minimizing risk of marine mammal injury. <p>e. Vessels will stay at least 1000 feet away from cow-calf pairs, feeding aggregations, or whales that are engaged in breeding behavior. If the vessel is approached by cow-calf pairs, it will remain out of gear as long as whales are within 984 feet of the vessel (consistent with safe operations)</p> <p>f. Consistent with NMFS marine mammal viewing guidelines (https://alaskafisheries.noaa.gov/pr/mm-viewing-guide), operators of vessels will, at all times, avoid approaching marine mammals within 300 feet. Operators will observe direction of travel and attempt to maintain a distance of 300 feet or greater between the animal and the vessel by working to alter course or slowing the vessel.</p> <p>g. Special consideration of North Pacific right whale and their critical habitat:</p> <ul style="list-style-type: none"> i. Vessel operators will avoid transit through North Pacific right whale critical habitat. If such transit cannot be avoided, operators must post a dedicated PSO on the bridge and reduce speed to 10 knots while in the North Pacific right whale critical habitat. Alternatively, vessels may transit at no more than 5 knots without the need for a dedicated PSO. 	<p>c. The transit of operational and support vessels through the North Slope region is not authorized prior to July 1. This operating condition is intended to allow marine mammals the opportunity to disperse from the confines of the spring lead system and minimize interactions with subsistence hunters. Exemption waivers to this operating condition may be issued by NMFS on a case-by-case basis, based upon a review of seasonal ice conditions and available information on marine mammal distributions in the area of interest.</p> <p>d. If the vessel approaches within 1 mile of observed whales, except when providing emergency assistance to whalers or in other emergency situations, the operator would take reasonable precautions to avoid potential interaction with the whales by taking one or more of the following actions, as appropriate:</p> <ul style="list-style-type: none"> i. Reducing vessel speed to less than 5 knots within 900 feet of the whale ii. Steering around the whale if possible iii. Operating the vessel to avoid causing a whale to make multiple changes in direction, avoiding sudden or multiple course changes iv. Checking the waters around the vessel to ensure that no whales are within 164 feet of the vessel prior to engaging the propellers. Reducing vessel speed to 9 knots or less when weather conditions reduce visibility to avoid the likelihood of injury to whales v. Vessels shall not exceed speeds of 10 knots in order to reduce potential whale strikes vi. If a whale approaches the vessel and if maritime conditions safely allow, the engine will be put in neutral and the whale will be allowed to pass beyond the vessel. If the vessel is taken out of gear, vessel crew will ensure that no whales are within 50 m of the vessel when propellers are re-engaged, thus minimizing risk of marine mammal injury. <p>e. Vessels will stay at least 1000 feet away from cow-calf pairs, feeding aggregations, or whales that are engaged in breeding behavior. If the vessel is approached by cow-calf pairs, it will remain out of gear as long as whales are within 984 feet of the vessel (consistent with safe operations)</p> <p>f. Consistent with NMFS marine mammal viewing guidelines (https://alaskafisheries.noaa.gov/pr/mm-viewing-guide), operators of vessels will, at all times, avoid approaching marine mammals within 300 feet. Operators will observe direction of travel and attempt to maintain a distance of 300 feet or greater between the animal and the vessel by working to alter course or slowing the vessel.</p> <p>g. Special consideration of North Pacific right whale and their critical habitat:</p> <ul style="list-style-type: none"> i. Vessel operators will avoid transit through North Pacific right whale critical habitat. If such transit cannot be avoided, operators must post a dedicated PSO on the bridge and reduce speed to 10 knots while in the North Pacific right whale critical habitat. Alternately, vessels may transit at no more than 5 knots without the need for a dedicated PSO. ii. Vessel operators will remain at least 800 meters from all North Pacific right whales and avoid approaching whales head-on, consistent with vessel safety. iii. Operators will maintain a ship log indicating the time and geographic coordinates at which vessels enter and exit North Pacific right whale critical habitat.

Alternative B	Alternative C	Alternative D	Alternative D2
<p>ii. Vessel operators will remain at least 800 m from all North Pacific right whales and avoid approaching whales head-on, consistent with vessel safety.</p> <p>iii. Operators will maintain a ship log indicating the time and geographic coordinates at which vessels enter and exit North Pacific right whale critical habitat.</p> <p>Vessels in Vicinity of Pacific Walruses and Polar Bears</p> <p>a. Operators should take all reasonable precautions, such as reduce speed or change course heading, to maintain a minimum operational exclusion zone of 0.5 miles around groups of feeding walruses.</p> <p>b. Except in an emergency, vessel operators would not approach within 0.5 miles of observed polar bears, within 0.5 miles of walrus observed on ice, or within 1 mile of walrus observed on land.</p> <p>c. For Polar Bears:</p> <ol style="list-style-type: none"> Operational and support vessels must be staffed with dedicated marine mammal observers to alert crew of the presence of polar bears and initiate mitigation responses. Vessels must maintain the maximum distance possible from concentrations of polar bears. No vessel should approach within an 805-meters (0.5-miles) radius of polar bears observed on land or ice. Vessels must avoid areas of active or anticipated polar bear subsistence hunting activity as determined through community consultations. The BLM and USFWS may require trained marine mammal monitors on the site of the activity or on board any vessel or vehicles to monitor the impacts of Industry's activity on polar bear. <p>Vessels in Vicinity of Seals</p> <p>a. Vessels used as part of a BLM-authorized activity would be operated in a manner that minimizes disturbance to wildlife in the coastal area. Vessel operators would maintain a 1-mile buffer from the shore when transiting past an aggregation of seals (primarily spotted seals) when they have hauled out on land, unless doing so would endanger human life or violate safe boating practices.</p> <p>Vessel Transit through Steller Sea Lion Critical Habitat/Near Major Rookeries and Haulouts</p> <p>Vessels will remain 3 nautical miles (nm) (5.5 km) from all Steller sea lion rookery sites listed in paragraph 50 CFR 224.103 (d)(1)(iii). The vessel operator will not purposely approach within 3 nm of any major Steller sea lion rookery or haulout unless doing so is necessary to maintain safe conditions.</p>	<p>(see above)</p>	<p>ii. Vessel operators will remain at least 800 meters from all North Pacific right whales and avoid approaching whales head-on, consistent with vessel safety.</p> <p>iii. Operators will maintain a ship log indicating the time and geographic coordinates at which vessels enter and exit North Pacific right whale critical habitat.</p> <p>Vessels in Vicinity of Pacific Walruses and Polar Bears</p> <p>a. Operators should take all reasonable precautions, such as reduce speed or change course heading, to maintain a minimum operational exclusion zone of 0.5 miles around groups of feeding walruses.</p> <p>b. Except in an emergency, vessel operators would not approach within 0.5 miles of observed polar bears, within 0.5 miles of walrus observed on ice, or within 1 mile of walrus observed on land.</p> <p>c. For Polar Bears:</p> <ol style="list-style-type: none"> Operational and support vessels must be staffed with dedicated marine mammal observers to alert crew of the presence of polar bears and initiate mitigation responses. Vessels must maintain the maximum distance possible from polar bears. No vessel should approach within an 805-meter (0.5-mile) radius of polar bears observed on land or ice. Vessels must avoid areas of active or anticipated polar bear subsistence hunting activity as determined through community consultations. The BLM and USFWS may require trained marine mammal monitors on the site of the activity or on board any vessel or vehicles to monitor the impacts of Industry's activity on polar bear. <p>Vessels in Vicinity of Seals</p> <p>a. Vessels used as part of a BLM-authorized activity would be operated in a manner that minimizes disturbance to wildlife in the coastal area. Vessel operators would maintain a 1-mile buffer from the shore when transiting past an aggregation of seals (primarily spotted seals) when they have hauled out on land, unless doing so would endanger human life or violate safe boating practices.</p> <p>Vessel Transit through Steller Sea Lion Critical Habitat/Near Major Rookeries and Haulouts</p> <p>Vessels will remain 3 nautical miles (nm) (5.5 km) from all Steller sea lion rookery sites listed in paragraph 50 CFR 224.103 (d)(1)(iii). The vessel operator will not purposely approach within 3 nm of any major Steller sea lion rookery or haulout unless doing so is necessary to maintain safe conditions.</p>	<p>Vessels in Vicinity of Pacific Walruses and Polar Bears</p> <p>a. Operators should take all reasonable precautions, such as reduce speed or change course heading, to maintain a minimum operational exclusion zone of 0.5 miles around groups of feeding walruses.</p> <p>b. Except in an emergency, vessel operators would not approach within 0.5 miles of observed polar bears, within 0.5 miles of walrus observed on ice, or within 1 mile of walrus observed on land.</p> <p>c. For Polar Bears:</p> <ol style="list-style-type: none"> Operational and support vessels must be staffed with dedicated marine mammal observers to alert crew of the presence of polar bears and initiate mitigation responses. Vessels must maintain the maximum distance possible from polar bears. No vessel should approach within an 805-meter (0.5-mile) radius of polar bears observed on land or ice. Vessels must avoid areas of active or anticipated polar bear subsistence hunting activity as determined through community consultations. The BLM and USFWS may require trained marine mammal monitors on the site of the activity or on board any vessel or vehicles to monitor the impacts of Industry's activity on polar bear. <p>Vessels in Vicinity of Seals</p> <p>a. Vessels used as part of a BLM-authorized activity would be operated in a manner that minimizes disturbance to wildlife in the coastal area. Vessel operators would maintain a 1-mile buffer from the shore when transiting past an aggregation of seals (primarily spotted seals) when they have hauled out on land, unless doing so would endanger human life or violate safe boating practices.</p> <p>Vessel Transit through Steller Sea Lion Critical Habitat/Near Major Rookeries and Haulouts</p> <p>Vessels will remain 3 nautical miles (nm) (5.5 km) from all Steller sea lion rookery sites listed in paragraph 50 CFR 224.103 (d)(1)(iii). The vessel operator will not purposely approach within 3 nm of any major Steller sea lion rookery or haulout unless doing so is necessary to maintain safe conditions.</p>

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2.4 ALTERNATIVES CONSIDERED BUT ELIMINATED FROM DETAILED ANALYSIS

2.4.1 Renewable Energy Alternative

An alternative that considers development of alternative or renewable energy was considered but eliminated from detailed analysis. Such an alternative does not meet the purpose of and need for an oil and gas program in the Coastal Plain and is not consistent with PL 115-97.

2.4.2 Deferred Leasing

An alternative that considers deferring leasing was considered but eliminated from detailed analysis. This is because PL 115-97 requires the BLM to hold two lease sales that offer not fewer than 400,000 acres each by December 22, 2024; the first of these has already been held. Further, such an alternative would have essentially the same impacts as the action alternatives already analyzed, albeit impacts would be delayed.

2.4.3 No Waivers, Modifications, and Exceptions

An alternative that would disallow waivers, modifications, or exceptions to any lease stipulation or required operating procedure was considered but eliminated from detailed analysis because it was not reasonable or practicable. There are some lease stipulations and required operating procedures that do not allow waivers, modifications, or exceptions; however, it is not reasonable to eliminate the potential for such flexibility for all lease stipulations and required operating procedures, particularly if the factors leading to the adoption of the lease stipulation or required operating procedure have changed sufficiently to make the protection it provides no longer justified or if the proposed operation would not cause unacceptable impacts. Also, in some cases it is not practicable to comply with all lease stipulations and required operating procedures. For example, in specific areas it may be impossible to avoid certain setbacks in the construction of linear features such as pipelines.

2.4.4 Preclude Future Development or Only Allow Contiguous Development

An alternative that precludes development is not consistent with PL 115-97, which requires the BLM to establish and administer a competitive oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain and to hold at least two lease sales of not fewer than 400,000 acres each. Oil and gas leases give lessees the right to develop oil and gas on the leases, subject to reasonable regulation. Precluding development altogether would not allow reasonable access to any leases purchased. Similarly, allowing only contiguous development may also preclude reasonable access to leases purchased if they are not next to each other.

2.4.5 Alternative C from the 2019 Final Coastal Plain EIS

Alternative C from the 2019 EIS would offer the entire program area for lease sale (1,563,500 acres); however, a large portion of the area offered for lease sale would be subject to NSO (359,400 acres). This alternative was dismissed from further analysis in this Leasing SEIS as it would not have been meaningfully different than the action alternatives brought forward for analysis, particularly Alternatives B. Alternative B would allow for leasing across the entire program area (1,563,500 acres), with 358,100 acres subject to NSO.

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Chapter 3. Environmental Consequences

3.1 INTRODUCTION

This chapter describes the environmental consequences of the alternatives evaluated in this Leasing SEIS. The discussion of potential direct, indirect, and cumulative impacts from future oil and gas development under each resource provides the scientific and analytic basis for evaluating the potential impacts of each of the alternatives described in **Chapter 2**. The approach to impact analysis is discussed further in **Appendix G**. A summary of the baseline environmental conditions for each resource analyzed (affected environment) is in **Appendix B**.

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such post-lease activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis in **Chapter 3** considers potential direct, indirect, and cumulative impacts from on-the-ground oil and gas activities.

The proposed leasing alternatives are a result of surface resource and management considerations and describe areas to offer for lease and the terms and conditions that would apply to exploration and development activities; they do not specifically propose development of oil and gas resources. For this reason, the analysis relies on a hypothetical development scenario consistent with those alternatives and PL 115-97 in a good faith effort to identify indirect effects of leasing that are not known at this time but nonetheless could be considered “reasonably foreseeable” (40 CFR Section 1508.8(b)) (see **Appendix C**).

The regulations governing leasing and development provide for multiple decision stages prior to any ground-disturbing activities being authorized and require further compliance with applicable laws, including NEPA, during post-leasing decision stages. Until the BLM receives and evaluates an application for an exploration permit, permit to drill, or other authorization that includes site-specific information about a particular project, impacts of actual exploration and development that might follow lease issuance are speculative, as so much is unknown as to location, scope, scale, and timing of that exploration and development. At each decision stage, the BLM retains the authority to approve, deny, or reasonably condition any proposed ground-disturbing activity based on compliance with the terms and conditions of the lease and applicable laws and policies; therefore, the analysis of effects of exploration and development in this Leasing SEIS necessarily reflects a more general, programmatic approach than could occur at the project-specific stage.

There are many uncertainties associated with projecting future petroleum exploration and development. These uncertainties include the amount and location of technically and economically recoverable oil; the timing of oil field discoveries and associated development; the future prices of oil and gas, and, more to the point, the many exploration companies’ individual assessment of future prices and other competitive calculations that play into corporate investment decisions; and the ability of industry to find petroleum and to mobilize the requisite technology to exploit it.

To address these uncertainties, the BLM and USFWS have made reasonable assumptions based on the previous two-dimensional seismic exploration of the Coastal Plain, the history of development in the NPR-A and other North Slope developments, their own knowledge of the almost entirely unexplored petroleum endowment of the Coastal Plain and current industry practice, and professional judgment. In making these assumptions, the BLM and USFWS have striven to minimize the chance that the resultant impact analysis would understate potential impacts; therefore, the hypothetical development scenarios (**Appendix C**) are intended to represent optimistic high-production, successful discovery, in a situation of favorable market prices.

The BLM and USFWS have relied on the best available science to inform its consideration of the environmental impacts surrounding an oil and gas leasing program in the Coastal Plain; however, the nature, abundance, and quality of the data often vary, depending on the action, the geographic region in which it occurs, and the environmental resources that may be affected. All these variables influence the understanding of how certain oil and gas exploration and development activities may affect environmental features. Where information is missing, this SEIS complies with 40 CFR 1502.21.

3.2 PHYSICAL ENVIRONMENT

3.2.1 Climate and Meteorology

Local and Global Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, construction, development, and production activities as well as the transportation, processing, storage, distribution, and downstream combustion of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on climate (via GHG emissions) from these activities.

The potential impacts of post-lease oil and gas activities on climate would largely be the result of the GHG emissions that would contribute to the global climate change impacts discussed in the *Affected Environment*, although localized impacts on climate from the infrastructure, equipment, and activities associated with oil and gas development would also occur in the program area. The GHG emissions from post-lease oil and gas activities in the program area would result primarily from the combustion of fossil fuels (mainly natural gas, diesel fuel and gasoline) used in construction, drilling, production activities as well as in the processing and transportation of the produced fuels. Smaller amounts of emissions would occur through fugitive leaks and permafrost degradation from surface-disturbing activities. Exploration activities including drilling, mud degassing, well testing, and seismic surveying would lead to emissions of GHG. However, due to the high uncertainty in the level of exploration activity and associated emissions that would occur, GHG emissions from exploration activities are not quantified. Exploration GHG emissions would comprise a very small fraction of the total GHG emissions from all action alternatives, as the majority of GHG emissions are contributed by the downstream combustion of produced oil. Seismic exploration emissions are further discussed in the *Impacts Common to All Action Alternatives* discussion of the Air Quality section. Outside the program area, GHG emissions would result from the transportation, processing, and downstream combustion of produced oil and changes in foreign oil consumption due to the impact of the produced oil on the global oil

market. These indirect GHG emissions are estimated and analyzed for each action alternative and discussed below.

The gross GHG emissions from oil and gas development and production activities in the program area are estimated for each action alternative using the oil production from the RFD scenario (see **Appendix C**) and emission intensities (metric ton of GHG per barrel of oil) calculated using the oil and gas emissions inventory for Alternative E of the Willow Master Development Plan Final SEIS (BLM 2023a). The Willow project represents a future large development on Alaska's North Slope and includes a central processing facility, up to four well pads, an air strip, an operations center, and other associated infrastructure. The emission intensities developed from the Willow oil and gas inventory include construction, drilling and completion of new wells, operation and maintenance activities, transportation of equipment, materials and personnel, the local processing, storage and transfer of produced liquids, and other supporting activities. More information on the methods used to estimate the emissions from oil and gas development and production in the program area is provided in **Section 2.2.1 of Appendix R**.

Gross emissions from the downstream transportation, processing, and combustion of produced oil are estimated using the Bureau of Ocean Energy Management's (BOEM) Greenhouse Gas Lifecycle Energy Emissions Model (GLEEM; Wolvovsky 2022). GLEEM is updated to include additional oil refinery emissions and conservatively assumes that all produced oil is combusted. As discussed in the RFD scenario (**Appendix C**), it is expected that production pipelines would be constructed to connect developments in the program area to the Trans-Alaska Pipeline System (TAPS) that transports crude oil from the North Slope to the Valdez Marine Terminal in southern Alaska. Crude oil is transported from Valdez to U.S. refineries on polar tankers. Emissions from the transport of oil produced in the program area to U.S. refineries in the TAPS and polar tankers are estimated using the projected annual oil production under each action alternative from the RFD scenario (**Appendix C**) and historical emissions intensities. These emissions are added to the transportation emissions from GLEEM. See **Section 2.2.2 of Appendix R** for a more detailed description of the updates made to GLEEM and the estimation of transportation emissions.

Co-occurring natural gas produced from oil wells in the program area is assumed to be re-injected to maintain reservoir pressure and enhance oil recovery (**Appendix C**); these emissions are included in the development and production emissions discussed above. As noted in **Section 3.2.6**, a natural gas transport pipeline from the North Slope to southcentral Alaska is currently planned, but it is expected to initially transport gas from established fields with proven reserves located outside the program area. Natural gas developments in the program area could eventually be connected to the pipeline if proven gas resources are discovered in the Coastal Plain. However, the connection of any gas fields in the Coastal Plain to the planned pipeline is highly uncertain and no RFD scenario is available for natural gas production in the program area. If the Coastal Plain is connected to a future natural gas pipeline and gas development occurs, then this would result in additional GHG emissions that would contribute to climate change and the types of impacts discussed in the *Affected Environment* (**Appendix B**) and, for oil production and use, in the following sections.

Oil produced in the program area and brought to market in the action alternatives would displace other sources of energy, such as oil, natural gas, other fossil fuels, and renewables. The BLM Energy Substitution Model (EnergySub) is used to estimate the quantity and type of energy sources that would be displaced by oil produced in the Coastal Plain under each action alternative (see **Appendix S**, Bureau of Land Management Energy Substitution Model for model details). EnergySub develops these estimates using baseline projections of what energy markets will look like through 2050, elasticities which provide measures for how supply and demand for alternative energy sources may change in response to changes in prices, and production schedules

developed with limited information on the amount of recoverable oil reserves that could be economically produced from the Coastal Plain. The energy substitution rates estimated by EnergySub for each action alternative are used as inputs to GLEEM to estimate GHG emissions that would result from these displaced energy sources. The net GHG emissions are then calculated by subtracting the GHG emissions from the displaced energy sources from the gross emissions under each action alternative. Note that GLEEM is updated to include additional oil refinery emissions and conservatively assumes that all produced oil is combusted.

Additionally, as oil is a global commodity with prices determined by global supply and demand, oil production in the program area would increase the global oil supply and place downward pressure on global oil prices. Reductions in global oil prices would potentially increase demand relative to the No Action Alternative resulting in additional GHG emissions. EnergySub is used to estimate the change in foreign oil consumption resulting from oil production in the program area. Emissions from these changes in foreign oil consumption are estimated by applying EPA (2023f) emission factors for stationary combustion of petroleum products to the estimated change in foreign oil consumption.

Both EnergySub's projections of substitution effects and the corresponding net GHG emissions calculated using these results depend in part on the elasticity parameters and baseline supply and demand projections included in the model. In the context of a transition to an increasingly decarbonized energy system, supply and demand elasticities and baseline supply and demand could differ from the default data included in EnergySub. While the extent and pace of future decarbonization are uncertain, sensitivity analyses conducted by BOEM in support of its 2024-2029 National Outer Continental Shelf Oil and Gas Leasing program provide insights into the potential net GHG impacts of oil from the Coastal Plain in the context of a more decarbonized energy system.¹ Using its MarketSim model, BOEM conducted sensitivity analyses with alternative elasticity values and baseline projections and found that substitution effects would likely be more pronounced and suggested that the net GHG emissions associated with OCS leasing and development may be much higher in a more decarbonized energy market compared to those estimated using MarketSim default assumptions. Due to the structural similarities between MarketSim and EnergySub, this finding suggests that substitution effects would be more pronounced and the net GHG emissions associated with future development in the Coastal Plain would likely be higher in the context of an energy system that will become more decarbonized than what is reflected in EnergySub's current elasticity values and baseline projections.

As discussed in Appendix S, the degree to which BLM may underestimate the net GHG impacts associated with future development in the Coastal Plain depends on the degree of future decarbonization. Due to the major changes required within the U.S. energy system, the significant costs of these changes, and the difficulty of decarbonizing certain heavy industry sectors (e.g., steel and cement manufacturing), the degree of future decarbonization is uncertain. Thus, the degree to which BLM may underestimate the net GHG impacts of Coastal Plain is also uncertain.

Alternative A

Under Alternative A (No Action), no federal minerals in the program area would be offered for future oil and gas lease sales. Thus, direct or indirect GHG emissions would not occur and there would be no contributions to global climate change from oil and gas development in the Coastal Plain. Energy demand would continue to be satisfied by energy sources, varying from other oil sources to renewable sources, produced outside of the program area. The absence of leasing activities and oil production in the program area itself would not

¹ Bureau of Ocean Energy Management. 2023. Economic Analysis Methodology for the 2024-2029 National Outer Continental Shelf Oil and Gas Leasing Proposed Final Program. BOEM 2023-059. Available online at <https://www.boem.gov/2024-2029-Economic-Analysis-Methodology>.

directly lead to emissions. Therefore, GHG emissions under the No Action Alternative are assigned a baseline value of zero.

Alternative B

Under Alternative B, all acres in the program area would be available for leasing and the number of acres with NSO stipulations would be the lowest of all action alternatives. The RFD scenario for Alternative B projects that four hypothetical developments and 14 satellite pads would be brought online over time with oil production beginning in 2032, peaking in 2053, and then declining until production stops in 2091 (**Appendix C**). Both the peak annual oil production and the total lifetime oil production from hypothetical developments are the highest under Alternative B as it is the least restrictive action alternative.

As discussed above, there are no direct emissions under Alternative B or the other action alternatives as the issuance of oil and gas leases would have no direct impacts on the environment because by itself as a lease does not authorize any on the ground oil and gas activities. Indirect GHG emissions would result from exploration, development, production, and related activities along with the transportation, processing, and downstream combustion of oil produced in the program area and the resulting changes in foreign oil consumption. These indirect GHG emissions would contribute to climate change and the types of impacts discussed in the *Affected Environment* (**Appendix B**) unlike Alternative A that would not result in any of those impacts.

The indirect and total GHG emissions (reported in carbon dioxide equivalent or CO₂e) for the hypothetical development scenarios under Alternatives B, C, and D are shown in **Table 3-1** using the IPCC AR6 100-year GWPs. Both gross and net emissions are presented for each action alternative. The net GHG emissions are then calculated by subtracting the GHG emissions from the displaced energy sources from the gross emissions under each action alternative. The emissions are presented through 2053 because the substitution rates and the change in foreign oil consumption are available through that year from EnergySub. Emissions of GHG would continue to occur through the potential lifetime of production in the program area; the total gross lifetime emissions are discussed separately below. A description of methods used to develop the emissions inventories are provided in **Section 2.2.1** of **Appendix R** along with annual emissions of individual greenhouse gases (i.e., CO₂, CH₄, and N₂O) and 20-year CO₂e. The EnergySub modeling and results are described in **Appendix S**, Bureau of Land Management Energy Substitution Model.

The total gross and net emissions under Alternative B through 2053 are approximately 587 million metric tons (MMT) and 236 MMT of CO₂e, respectively, which are the highest among all alternatives. Downstream combustion emissions comprise the majority (i.e., approximately 71 percent) of the total gross indirect emissions. When accounting for the emissions from displaced energy sources (net emissions), the contribution of downstream combustion emissions is approximately 30 percent of the total net emissions, and the majority (i.e., 52 percent) of the total net emissions are from the change in foreign oil consumption. The total net CO₂e emissions under Alternative B through 2053 are approximately 15.3 MMT (approximately 7 percent) higher than Alternative C, 143.2 MMT (approximately 155 percent) higher than Alternative D, and 160.7 MMT (approximately 214 percent) higher than Alternative D2, due to the higher oil production from hypothetical developments under Alternative B. The social costs of greenhouse gas emissions are discussed in **Section 3.4.10**, *Impacts Common to All Alternatives*, and presented in **Appendix G**, **Section G.2.1**, *Social Costs of GHG Emissions*.

Table 3-1
Total (Gross and Net) Greenhouse Gas Emissions (million metric tons of 100-year CO₂e)
under Alternatives B, C, D, and D2 for the period 2026 to 2053

Alternative	GHG Emissions Type	Gross CO ₂ e ^a	CO ₂ e from Displaced Energy Sources ^b	Net CO ₂ e Change ^c
Alternative B	Development and Production	38.42	-	+38.42
Alternative B	Transportation and Processing	8.22	3.07	+5.14
Alternative B	Downstream Combustion	418.15	348.54	+69.61
Alternative B	Change in Foreign Oil Consumption	122.66	-	+122.66
Alternative B	Total	587.44	351.61	+235.83
Alternative C	Development and Production	36.84	-	+36.84
Alternative C	Transportation and Processing	7.72	2.89	+4.83
Alternative C	Downstream Combustion	392.77	329.18	+63.59
Alternative C	Change in Foreign Oil Consumption	115.24	-	+115.24
Alternative C	Total	552.57	332.07	+220.50
Alternative D	Development and Production	18.93	-	+18.93
Alternative D	Transportation and Processing	3.10	1.16	+1.94
Alternative D	Downstream Combustion	157.93	132.63	+25.30
Alternative D	Change in Foreign Oil Consumption	46.40	-	+46.40
Alternative D	Total	226.37	133.80	+92.57
Alternative D2	Development and Production	14.63	-	+14.63
Alternative D2	Transportation and Processing	2.55	0.96	+1.59
Alternative D2	Downstream Combustion	129.73	108.97	+20.76
Alternative D2	Change in Foreign Oil Consumption	38.12	-	+38.12
Alternative D2	Total	185.03	109.93	+75.10

Note: CO₂e (carbon dioxide equivalent); GHG (greenhouse gas). The global warming potential values used to calculate 100-year CO₂e are from the Sixth Assessment Report of the Intergovernmental Panel on Climate Change (2021) and are carbon dioxide = 1; methane = 29.8; and nitrous oxide = 273. The CO₂e emissions beyond 2053 under each action alternative are provided in the discussion of each alternative.

^a The gross CO₂e from the transportation, processing, and downstream combustion of produced oil are estimated using the Bureau of Ocean and Energy Management's (BOEM) Greenhouse Gas Life Cycle Energy Emissions Model (Wolvovsky 2022) with updates. Numbers may not match exactly due to rounding.

^b CO₂e from displaced energy sources is estimated using the substitution rates modeled by the BLM EnergySub and in GLEEM with updates. Numbers may not match exactly due to rounding.

^c The net CO₂e change is the difference between the previous columns. The + sign indicates an increase in emissions relative to Alternative A (No Action Alternative).

The total domestic gross GHG emissions including emissions from construction and development activities, oil transportation and processing, and downstream combustion over the lifetime of RFD scenario for Alternative B (i.e., 2023 through 2091) are 909 MMT of CO₂e, which is 230 MMT higher than Alternative C, 686 MMT higher than Alternative D, and 732 MMT higher than Alternative D2.

Hypothetical developments under Alternative B would also result in an increase in black carbon emissions which can increase snow and ice melt and lead to other effects on climate. Black carbon is a component of the PM_{2.5} emissions presented for each action alternative in the *Direct and Indirect Impacts* of **Section 3.2.2**. When considering all action alternatives, the total emissions of PM_{2.5} would be the highest under Alternative B, and thus, black carbon emissions would likely also be the highest under Alternative B.

Under the Paris Agreement, the United States has established an economy-wide target of reducing its net GHG emissions by 50 percent to 52 percent below 2005 level by 2030 with a long-term goal of achieving net-zero by 2050 (UNFCCC 2021). The 2005 U.S. net emissions (including sinks) were 6,645 MMT CO₂e (EPA 2022b). Therefore, the 2030 U.S. net emissions target is estimated to be between 3,198.6 and 3,222.5 MMT CO₂e. Oil production is not projected to begin in the program area until 2032, and therefore cannot be directly compared to the 2030 target. Instead, the annual net emissions in the year closest to 2030 (i.e., 2032, the

anticipated first year of production) are compared to this target. The annual net emissions under Alternative B in 2032 are 1.86 MMT CO₂e, which comprise roughly 0.06 percent of the U.S. 2030 net GHG emissions target.

The BLM (2023b) Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends (hereafter referred to as the BLM Specialist Report) includes a carbon budget analysis of future GHG emissions from the development, processing, transportation, and downstream combustion of oil and gas from all onshore, federal lands under 1.5°C and 2°C scenarios. BLM (2023) estimates that without the total GHG emissions from federal oil and gas, there would be roughly an additional 16 days before the global carbon budget is exhausted under a 1.5°C scenario and 53 days under a 2°C scenario (see the *Cumulative Impacts* section for more information).

Due to the development, production, and transportation in Alaska of oil produced in the program area from 2026 to 2053, Annual average GHG emissions under Alternative B are 1.5 MMT of CO₂e. This is approximately 4 percent of the total GHG emissions of 35.8 MMT CO₂e in Alaska in 2020 (**Table B-2**). Emissions from transportation, processing, and downstream combustion outside Alaska are excluded from this comparison.

The EPA Greenhouse Gas Equivalencies Calculator (EPA 2023a) indicates that the annual average gross (including both domestic gross and foreign) GHG emissions from the start of development (year 2026) through 2053 of approximately 21 MMT CO₂e under Alternative B, are equivalent to:

- GHG emissions from 2,735,412 homes' energy use for one year
- GHG emission from 5.4 coal-fired powerplants for one year
- GHG emissions from 115,366 railcars' worth of coal burned
- GHG emissions from 2,360,249,451 gallons of gasoline consumed
- GHG emissions avoided by 5,521 wind turbines operating for one year

Alternative C

Alternative C is more restrictive than Alternative B with 526,300 acres made not available for leasing (approximately 34 percent of the program area) and additional acres subject to NSO and CSU relative to Alternative B. The RFD scenario for Alternative C includes three hypothetical developments and 9 satellite pads with oil production beginning in 2032, peaking in 2046, and continuing through 2085. The total lifetime oil production and peak annual oil production from hypothetical developments under Alternative C are lower than Alternative B but higher than Alternatives D and D2.

As with the other action alternatives, no direct GHG emissions or impacts on climate would occur from leasing under Alternative C. Post-lease activities under Alternative C would result in indirect emissions of GHGs that would contribute to climate change and the types of impacts discussed in the *Affected Environment* (**Appendix B**) unlike Alternative A that would not result in any of those impacts.

As shown in **Table 3-1**, the total gross and net indirect emissions under Alternative C through 2053 are approximately 553 MMT and 221 MMT of CO₂e, respectively, which are lower than Alternative B and higher than Alternatives D and D2. As with the other action alternatives, the majority (approximately 71 percent) of the total gross indirect emissions are from downstream combustion of produced oil. For total net indirect emissions of the same time period, approximately 29 percent of the emissions are due to the downstream combustion of produced oil and the majority (approximately 52 percent) of the total net emissions are from the change in foreign oil consumption. The total net CO₂e emissions under Alternative C from 2023 to 2053

are approximately 15.3 MMT (6 percent) lower than Alternative B, 127.9 MMT (138 percent) higher than Alternative D, and approximately 145 MMT (194 percent) higher than Alternative D2. The social costs of greenhouse gas emissions under Alternative C are discussed in **Section 3.4.10, *Impacts Common to All Alternatives***, and presented in **Appendix G, Section G.2.1, *Social Costs of GHG Emissions***.

The total domestic gross GHG emissions over the lifetime of the RFD scenario under Alternative C (i.e., 2023 through 2085) are 679 MMT CO₂e, which is 230 MMT lower than Alternative B, 456 MMT higher than Alternative D, and 505 MMT higher than Alternative D2.

Hypothetical developments under Alternative C would also result in an increase in black carbon emissions which can increase snow and ice melt and lead to other effects on climate. Black carbon is a component of the PM_{2.5} emissions presented for each action alternative in the *Direct and Indirect Impacts* of **Section 3.2.2**. The PM_{2.5} emissions under Alternative C would be lower than Alternative B and higher than Alternatives D and D2, and thus, black carbon emissions would likely also be lower than Alternative B and higher than Alternatives D and D2.

The annual net emissions in the year closest to 2030 (i.e., 2032, the anticipated first year of production) are compared to the U.S. 2030 net GHG emissions target. The annual net emissions in 2032 are 1.8 MMT CO₂e, which comprise roughly 0.06 percent of the U.S. 2030 net GHG emissions target. The BLM (2023b) Specialist Report includes a carbon budget analysis of future GHG emissions from the development, processing, transportation, and downstream combustion of oil and gas from all onshore, federal lands under 1.5°C and 2°C scenarios. BLM (2023) estimates that without the total GHG emissions from federal oil and gas, there would be roughly an additional 16 days before the global carbon budget is exhausted under a 1.5°C scenario and 53 days under a 2°C scenario (see the *Cumulative Impacts* section for more information).

Annual average GHG emissions under Alternative C due to the development, production, and transportation in Alaska of oil produced in the program area from 2026 to 2053 are 1.48 MMT of CO₂e, which is approximately 4 percent of the total GHG emissions of 35.8 MMT CO₂e in Alaska in 2020. Emissions from transportation, processing, and downstream combustion outside Alaska are excluded from this comparison.

The EPA Greenhouse Gas Equivalencies Calculator (EPA 2023a) indicates that the annual average gross GHG emissions (including both domestic gross and foreign) from the projected start of development through 2053 of 19.7 MMT of CO₂e (calculated using 100-year GWP from IPCC AR6) under Alternative C, are equivalent to:

- GHG emissions from 2,573,054 homes' energy use for one year
- GHG emission from 5.1 coal-fired powerplants for one year
- GHG emissions from 108,519 railcars' worth of coal burned
- GHG emissions from 2,220,159,441 gallons of gasoline consumed
- GHG emissions avoided by 5,193 wind turbines operating for one year

Alternative D

Alternative D is more restrictive than Alternative C with 797,700 acres not available for leasing (approximately 51 percent of the program area) and 726,300 acres subject to NSO. The RFD scenario for Alternative D includes one hypothetical development CPF and 6 satellite pads with oil production beginning in 2032, peaking in 2034, and continuing through 2073. As with the other alternatives, no direct emissions or impacts on climate would occur under Alternative D. Indirect emissions of GHGs would result from post-lease oil and gas activities that would contribute to climate change and the types of impacts discussed in the

Affected Environment (Appendix B). The estimated acreage of disturbance for Alternative D is approximately 1,040 acres.

As shown in **Table 3-1**, the gross and net indirect emissions under Alternative D through 2053 are 226 MMT and 93 MMT, respectively. As with the other action alternatives, the majority of the indirect gross emissions would result from downstream combustion, while the change in foreign oil consumption would be the largest contributor to the indirect net emissions. The total net CO_{2e} emissions under Alternative D from 2023 to 2053 are approximately 143 MMT (61 percent) lower than Alternative B and 128 MMT (58 percent) lower than Alternative C due lower oil production, while being 17.5 MMT (23 percent) higher than Alternative D2. The social costs of greenhouse gas emissions under Alternative D are discussed in **Section 3.4.10, Impacts Common to All Alternatives**, and presented in **Appendix G, Section G.2.1, Social Costs of GHG Emissions**.

The total domestic gross GHG emissions over the lifetime of the RFD scenario for Alternative D (i.e., 2023 through 2073) are 223 MMT of CO_{2e}, which is 686 MMT lower than Alternative B, 456 MMT lower than Alternative C, and 46 MMT higher than Alternative D2.

Hypothetical developments under Alternative D would also result in an increase in black carbon emissions which can increase snow and ice melt and lead to other effects on climate. Black carbon is a component of the PM_{2.5} emissions presented for each action alternative in the *Direct and Indirect Impacts* of **Section 3.2.2**. The total emissions of PM_{2.5} would be lower under Alternative D compared to Alternatives B and C and higher compared to Alternative D2, and thus, black carbon emissions would likely also be lower under Alternative D compared to Alternative B and C, and higher than Alternative D2.

The annual net emissions in the year closest to 2030 (i.e., 2032, the anticipated first year of production) are compared to the U.S. 2030 net GHG emissions target. The annual net emissions in 2032 under Alternative D are 1.8 MMT CO_{2e}, which comprise roughly 0.06 percent of the U.S. 2030 net GHG emissions target. The BLM (2023b) Specialist Report includes a carbon budget analysis of future GHG emissions from the development, processing, transportation, and downstream combustion of oil and gas from all onshore, federal lands under 1.5°C and 2°C scenarios. BLM (2023) estimates that without the total GHG emissions from federal oil and gas, there would be roughly an additional 16 days before the global carbon budget is exceeded under a 1.5°C scenario and 53 days under a 2°C scenario (see the Cumulative Impacts section for more information).

Annual average GHG emissions under Alternative D due to the development, production, and transportation in Alaska of oil produced in the program area from 2026 to 2053 are 0.74 MMT of CO_{2e}, which is approximately 2 percent of the total GHG emissions of 35.8 MMT CO_{2e} in Alaska in 2020 (**Table B-2**). Emissions from transportation, processing, and downstream combustion outside Alaska are excluded from this comparison.

The EPA Greenhouse Gas Equivalencies Calculator (EPA 2023a) indicates that the annual average gross (including both domestic gross and foreign) GHG emissions from the start of development through 2053 of 8.1 MMT of CO_{2e} (calculated using 100-year GWP from IPCC AR6) under Alternative D, are equivalent to:

- GHG emissions from 1,054,063 homes' energy use for one year
- GHG emission from 2.1 coal-fired powerplants for one year
- GHG emissions from 44,455 railcars' worth of coal burned
- GHG emissions from 909,497,647 gallons of gasoline consumed
- GHG emissions avoided by 2,127 wind turbines operating for one year

Alternative D2

Alternative D2 is the most restrictive of all action alternatives, limiting the leasable area to 400,000 acres and applying NSO stipulations to 231,700 acres of that leasable area (approximately 58 percent of the leasable area). Alternative D2 additionally constrains hypothetical development to areas subject to Standard Lease Terms and Conditions that comprise 80,900 acres (approximately 20 percent of the leasable area). The RFD scenario for Alternative D2 includes one hypothetical development CPF and three satellite pads with oil production beginning in 2032, peaking in 2034, and continuing through 2070.

As with the other alternatives, no direct emissions or impacts on climate would occur under Alternative D2. Indirect emissions of GHGs, however, would result from post-lease oil and gas activities that would contribute to climate change and the types of impacts discussed in the *Affected Environment (Appendix B)*.

As shown in **Table 3-1**, the gross and net indirect emissions under Alternative D2 through 2053 are 185 MMT and 75 MMT, respectively. As with the other action alternatives, the majority of the indirect gross emissions would result from downstream combustion, while the change in foreign oil consumption would be the largest contributor to the indirect net emissions. The total net CO₂e emissions under Alternative D2 from 2023 to 2053 are approximately 161 MMT (68 percent) lower than Alternative B, 145 MMT (66 percent) lower than Alternative C, and 17 MMT (19 percent) lower than Alternative D due lower oil production. The total domestic gross GHG emissions over the lifetime of the RFD scenario for Alternative D2 (i.e., 2023 through 2070) are 177 MMT of CO₂e, which is 732 MMT lower than Alternative B, 502 MMT lower than Alternative C, and 46 MMT lower than Alternative D.

Hypothetical developments under Alternative D2 would also result in an increase in black carbon emissions which can increase snow and ice melt and lead to other effects on climate. Black carbon is a component of the PM_{2.5} emissions presented for each action alternative in the *Direct and Indirect Impacts* of **Section 3.2.2**. The total emissions of PM_{2.5} would be the lowest under Alternative D2 compared to Alternatives B, C, and D, and thus, black carbon emissions would likely also be the lowest under Alternative D2.

The annual net emissions in the year closest to 2030 (i.e., 2032, the anticipated first year of production) are compared to the U.S. 2030 net GHG emissions target. The annual net emissions in 2032 under Alternative D2 are 1.8 MMT CO₂e, which comprise roughly 0.06 percent of the U.S. 2030 net GHG emissions target. The BLM (2023b) Specialist Report on Annual Greenhouse Gas Emissions and Climate Trends includes a carbon budget analysis of future GHG emissions from the development, processing, transportation, and downstream combustion of oil and gas from all onshore federal lands under 1.5°C and 2°C scenarios. BLM (2023) estimates that without the total GHG emissions from federal oil and gas, there would be roughly an additional 16 days before the global carbon budget is exhausted under a 1.5°C scenario and 53 days under a 2°C scenario (see the Cumulative Impacts section for more information).

Due to the development, production, and transportation in Alaska of oil produced in the program area from 2026 to 2053, annual average GHG emissions under Alternative D2 are 0.58 MMT of CO₂e. This is approximately 2 percent of the total GHG emissions of 35.8 MMT CO₂e in Alaska in 2020. Emissions from transportation, processing, and downstream combustion outside Alaska are excluded from this comparison.

The EPA Greenhouse Gas Equivalencies Calculator (EPA 2023a) indicates that the annual average gross (including both domestic gross and foreign) GHG emissions from the start of development through 2053 of

6.6 MMT of CO₂e (calculated using 100-year GWP from IPCC AR6) under Alternative D2, are equivalent to:

- GHG emissions from 861,572 homes' energy use for one year
- GHG emission from 1.7 coal-fired powerplants for one year
- GHG emissions from 36,337 railcars' worth of coal burned
- GHG emissions from 743,407,538 gallons of gasoline consumed
- GHG emissions avoided by 1,739 wind turbines operating for one year

Impacts of Climate Change on Potential Development

The impacts of climate change on development in the program area would potentially result from a shorter winter construction and ice road seasons, permafrost thawing, increases in precipitation and coastal erosion, and other changes related to a warming climate.

The winter construction season is defined as the time when the ground and lakes are adequately frozen to support heavy equipment movement. Permafrost is not likely to disappear in the program area during the life of any oil and gas development in the program area; however, if temperatures continue to warm in the area, the warm season active zone (thawed soil zone) would go deeper, making equipment movement more difficult in warm months, possibly increasing road maintenance frequency and costs. If summer active soil depth increases substantially, allowances would need to be made for more substantial structural supports that rely on permafrost, perhaps requiring deeper anchoring of such supports. A shorter ice road season would affect the transport of materials and personnel for developments and other activities that rely on ice roads.

Long-term trends show that both the extent and thickness of Arctic sea ice is decreasing (IPCC 2021, Druckenmiller et al. 2022). Further declines in Arctic sea ice can have their most significant impacts on temperatures in North Slope coastal areas, such as the program area. Inland areas are buffered from the moderating effects of open water, so the program area would be more sensitive to changes in sea ice, compared to developments farther inland. Losses of sea ice and thawing soil along the coastline allows for greater coastal erosion from wind and water that can pose serious risks for coastal infrastructure (University of Alaska Fairbanks 2013). Rising sea levels may also exacerbate coastal erosion and flooding risks for infrastructure near the coast, although the sea ice loss and permafrost thaw are likely to result in larger impacts sooner (NOAA 2022).

Precipitation is projected to increase in the North Slope and across Alaska. Increases in precipitation along with warming temperatures could result in large surface runoff amounts and spring ice breakup events on rivers. This may increase flood risks and impacts on infrastructure.

Transboundary Impacts

GHG emissions disperse relatively quickly and evenly over the time scales of concern for climate change (decades or longer) throughout the global atmosphere; therefore, impacts from the proposed Coastal Plain leasing program would not be concentrated close to such emissions, such as in the Arctic Refuge or in adjacent areas of Canada. Consequently, the proximity of the proposed development to Canada would result in no greater climate change-related impacts. The impact of GHG emissions from hypothetical developments in the program area on climate in Canada would be similar to the impacts in the program area and North Slope.

Cumulative Impacts

Cumulative GHG emissions include the indirect GHG emissions from post-lease oil and gas activities in the program area (including downstream combustion and changes in foreign oil consumption emissions) as well

as the emissions from existing sources on the North Slope presented in **Table B-3** and the other RFFA sources described in **Appendix G**.

The annual average gross CO₂e emissions from hypothetical development in the program area (including development, production, transportation, processing, downstream combustion, and the change in foreign oil consumption) are approximately 21.0 MMT CO₂e under Alternative B, 19.7 MMT under Alternative C, 8.1 MMT under Alternative D, and 6.6 MMT under Alternative D2. Emissions from large, existing sources in the North Slope were approximately 9.0 MMT CO₂e in 2021 (**Table B-3**). Potential emissions from RFFAs are provided and discussed in **Section 1.3** of **Appendix R**. Except for the Willow Master Development project, specific information on the lifetime and schedules of these projects was not available, and thus annual average emissions could not be estimated. The projected annual average CO₂e emissions from the Willow Master Development Project under Alternative E, which the BLM announced as the selected alternative in 2023, are approximately 9.3 MMT (BLM 2023a). Together, the cumulative annual average GHG emissions are 24.9 to 39.3 MMT of CO₂e (comprising of approximately 6.6 to 21.0 MMT of Coastal Plain gross emissions and approximately 18.3 MMT of other North Slope emissions) which is approximately 0.40 percent to 0.66 percent of the 2020 U.S. GHG inventory (5,981.4 MMT) and approximately 0.75 percent to 1.23 percent of the U.S. net GHG emissions target for 2030.

The BLM (2023b) Specialist Report provides an estimate of the total GHG emissions from the extraction, processing, transportation, and end use of fossil fuels from federal onshore mineral estate across the U.S. along with a summary of projected climate change impacts. It estimates that the total GHG emissions from onshore federal fossil fuels in fiscal year 2022 were approximately 1,033.21 MMT CO₂e, with 1.31 MMT of CO₂e (0.13 percent) coming from federal fossil fuels in Alaska (BLM 2023a). The report also provides an estimate of the long-term cumulative GHG emissions from onshore federal oil, gas, and coal production from 2023 to 2050 of approximately 24,508 MMT of CO₂e (BLM 2023a).

Using these long-term projections of federal fossil fuel emissions, BLM performed a carbon budget analysis to estimate the impact of total federal oil and gas emissions on carbon budgets that limit global warming to 1.5°C or 2°C above pre-industrial levels as specified in the Paris Agreement (UNFCCC 2021). BLM used global carbon budget estimates made by the Global Carbon Project which suggest that the world has a 50 percent chance of exceeding 1.5°C in approximately 7.68 years and 2.0°C in approximately 24.85 years at current emission rates (BLM 2023a). Before the depletion of the carbon budgets for limiting global warming to 1.5°C and 2°C, BLM estimates that the total GHG emissions from onshore federal oil and gas activities would be 2,152 and 7,223 million metric tons, respectively, comprising 0.57 percent and 0.59 percent of the respective remaining carbon budgets (**Table 3-2**). BLM estimated that the time to exhaust these remaining carbon budgets without the total federal oil and gas emissions would be 7.72 years under the 1.5°C scenario and 24.99 years under the 2°C scenario, which is 16 and 53 days longer than the times to exhaustion when including federal oil and gas activities, respectively (**Table 3-2**, BLM 2023a).

Additionally, BLM (2023) used the Model for the Assessment of Greenhouse Gas Induced Climate Change to estimate the increases in average global surface temperatures from the long-term estimates of total onshore federal fossil fuels (including oil, gas, and coal). BLM estimates that the total long-term fossil fuel emissions would raise average global surface temperatures by a range of approximately 0.01 to 0.015 °C, depending on the AEO energy scenario and future climate scenario used.

Table 3-2
Evaluation of the Total Greenhouse Gas Emissions from Federal Oil and Gas with
Respect to Global Carbon Budgets Aligned with 1.5°C and 2°C

Metric	1.5°C	2°C
Remaining Carbon Budget (MMT ¹ CO ₂)	380,000	1,230,000
Time to Exhaust Remaining Budget (years)	7.68	24.85
Federal Oil and Gas Emissions During Budget Timeframe (MMT CO ₂)	2,152	7,223
Federal Oil and Gas Fraction of Carbon Budget (%)	0.57%	0.59%
Time to Exhaust Budget without Federal Oil and Gas Emissions (years)	7.72	24.99
Additional Time to Exhaust Budget without Federal Oil and Gas Emissions (days)	16	53
Estimated Global Surface Warming Attributable to Federal Minerals (°C)	0.0023	0.0065

Source: BLM 2023a, Table 9-1

¹ MMT = million metric ton

3.2.2 Air Quality

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on-the-ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such on-the-ground activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on air quality from on-the-ground activities.

This section describes the potential impacts of future Coastal Plain oil and gas development on air resources. A decision to authorize leasing may lead to indirect impacts because the issuance of leases could result in on-the-ground oil and gas activities being permitted. These on-the-ground activities would emit air pollutants from a variety of sources during exploration, development, production, and abandonment and reclamation. These pollutants could affect air quality and AQRVs in the Coastal Plain and in nearby areas.

Although the specific location, timing, and level of any potential future oil and gas development in the Coastal Plain are unknown at this time, regional impacts on air quality and AQRVs are evaluated by performing regional photochemical modeling of hypothetical low and high oil and gas development scenarios that represent potential high and low levels of development in the Coastal Plain described in the RFD (**Appendix C**). The regional modeling assessment is conducted with the Comprehensive Air quality Model with extensions (CAMx). CAMx is a state-of-the-science photochemical grid model with a “one-atmosphere” treatment of tropospheric air pollution (ozone, particulates and precursors) over spatial scales ranging from neighborhoods to continents. CAMx has been used to analyze air quality impacts in other modeling studies in the U.S., including State Implementation Plans (SIPs) and other actions related to EISs by the BLM and other agencies under NEPA and programmatic NEPA assessments, and by the U.S. Environmental Protection Agency (EPA) to support federal rulemaking.

The CAMx modeling database from the Willow Master Development Plan EIS (BLM 2023a) was supplemented with hypothetical oil and gas development in the program area and used to determine potential air quality and AQRV impacts resulting from the program area development. Impacts are assessed throughout a 4 km resolution modeling domain centered on the North Slope of Alaska. A spatial map of the extent of this

domain and additional information on the modeling configuration and inputs can be found in **Sections 1.2.2.1** and **1.2.2.2** of **Appendix R** and the BLM (2023). The regional modeling was performed for three scenarios:

- The No Action Alternative scenario which includes the regional cumulative emissions in the North Slope and the proposed Willow Master Development Plan project but no oil and gas development in the Coastal Plain.
- A hypothetical high development scenario that includes all cumulative emissions from the No Action Alternative plus hypothetical oil and gas RFD for Alternative B. This includes four CPFs, 14 well pads, and associated infrastructure in the program area.
- A hypothetical low development scenario that includes the cumulative emissions from the No Action Alternative plus emissions from one potential future development in the Coastal Plain with one CPF, four well pads, and associated infrastructure. This hypothetical low development scenario has potentially less development and production than Alternatives B, C and D, but potentially higher development and production than Alternative D2 due to the inclusion of an additional satellite pad in the hypothetical low development scenario.

The regional photochemical modeling requires an emissions inventory for all sources within the modeling domain in addition to the program area oil and gas inventory. The emissions inventory for photochemical modeling includes point sources, area sources, non-road and on-road mobile sources, sea salt, dust, biogenic emissions, lightning-related emissions, and fire emissions (BLM 2023a). Regional emissions from sources other than the Willow development and the hypothetical oil and gas development in the program area are based on the Bureau of Ocean Energy Management (BOEM) Arctic Air Quality Modeling Study (Fields Simms et al. 2018; Stoeckenius et al. 2017) with updates made in the Willow EIS (BLM 2023) to account for additional known future projects. A summary of existing regional emissions for the North Slope and adjacent waters (the Beaufort Sea and Chukchi Sea planning areas) is available from the BOEM modeling study (Fields Simms et al. 2018) and the BLM Willow EIS (BLM 2023a). Existing emissions from onshore sources (e.g., oil and gas production and exploration, airports, pipelines, and non-oil and gas-related stationary and mobile sources) comprise most of the total regional emissions; emissions from offshore sources (e.g., drilling rigs, survey/drilling vessels and aircraft, and commercial vessels) are small in comparison. Overall, onshore oil and gas sources comprise the largest fraction of existing emissions for all criteria air pollutants and precursors in the 4 km resolution domain except for PM from unpaved roads.

Modeled concentrations for criteria air pollutants are processed in the appropriate form of the NAAQS for comparison with these standards. Air quality related values (AQRV) corresponding to atmospheric deposition and visibility are also assessed using CAMx modeled values that are aggregated and postprocessed to the appropriate metrics, namely nitrogen and sulfur deposition fluxes for deposition and visibility impairment in units of delta-deciviews (Δdv) for visibility.

Potential near-field impacts were assessed from hypothetical oil and gas development in the program area by tiering to the near-field modeling performed for the Willow Master Development Project (BLM 2023a), which is applied here as a type of a potential future development that could occur in the Coastal Plain. A summary of the methodology and results of the near-field modeling is provided in the *Impacts Common to All Action Alternatives* section, and more detailed information is provided in **Section 1.2.3** of **Appendix R**.

Alternative A

Under Alternative A, no federal minerals in the program area would be offered for future oil and gas lease sales. No new emissions would result in the program area due to the non-approval of any of the action

alternatives. No potential impacts on air quality or AQRVs from oil and gas development in the Coastal Plain would occur. Local and regional air emission sources, described above under *Affected Environment*, would continue to contribute air pollutants to the North Slope. The increase in emissions from oil and gas-generating sources in the Coastal Plain would not occur in the absence of oil and gas development; however, emissions-generating sources outside the Coastal Plain may continue to increase, particularly those related to onshore and offshore oil and gas development.

Impacts Common to All Action Alternatives

The types of air emission sources typically associated with oil and gas development on the North Slope of Alaska are described in detail in a number of studies and EISs, including the Alpine Satellite Development Plan (BLM 2004), the GMT1 Final SEIS (BLM 2014), the GMT2 Final SEIS (BLM 2018a), the Nanushuk Project EIS (USACE 2018), the Alaska BLM North Slope Regional Air Quality Modeling Study (BLM 2020b) and the Willow Master Development Project (BLM 2023a). These studies detail the oil and gas development phases and the associated emission sources required during each phase to bring oil and gas resources on the North Slope to production. The types of emissions sources analyzed in those studies would be similar to those required to recover oil and gas resources in the Coastal Plain.

As described by these reports, emissions and emission sources would vary based on the phase of development, as summarized below. Activities projected to occur within 5 years after the first lease sale are considered short term; activities projected to occur more than 5 years after the first lease sale are considered long term.

- During exploration, seismic surveying emissions would be produced by vibriosis rubber tracked vehicles, helicopters, and bulldozers or larger tracked vehicles used to pull the camp trains. Pollutant emissions would consist of NO_x, CO, and other criteria and hazardous pollutants, and the emissions would be limited to the period of exploration and surveying.
- During exploratory drilling and pad construction, emissions would be produced mainly by drilling equipment required for exploratory and delineation wells. Additional sources of emissions would include equipment required to build ice roads, support equipment and vehicles to bring personnel, materials, and supplies to the well pad locations, and intermittent activities such as mud degassing and well testing. Pollutant emissions would consist of NO_x, CO, VOCs, and other criteria and hazardous pollutants. Exploration of the first lease area is anticipated to occur within 2 to 4 years of the first lease sale. Emissions from exploration activities would be short term and temporary.
- During the development phase, emissions would be produced by heavy construction equipment used to construct the CPFs, satellite well pads, ice roads, airstrips, and pipelines; well drilling and completion drilling engines/turbines; diesel trucks used to bring in equipment and gravel; blasting at gravel sources and gravel road construction; and support vehicles and aircraft (for example, NRC 2003). Emissions also would be produced by construction equipment used to construct the STP and barge landing area. The primary emissions during development would be particulates from ground disturbance and exhaust-related emissions from equipment, including NO_x, CO, with lesser amounts of VOCs, PM_{2.5}, PM₁₀ and SO₂. Since the program area is undeveloped, oil and gas resource development would require the construction of a system of gravel and ice roads, bridges of varying sizes, and airstrips to access the CPFs and satellite well pads, as well as construction of the CPFs and satellite pads themselves. This construction would require the development of gravel pits. Infrastructure and gravel pit development would be sources of localized fugitive particulate matter emissions, both during construction of these features and during use of the roads and operation of the gravel pits (e.g., blasting, loading, and hauling). The first lease area is anticipated to be developed

within 5 to 7 years of the first lease sale. Emissions associated with construction would be short term and temporary.

- During the production phase, the primary source of emissions would be power generation for heating, oil pumping, and water injection. The emissions would consist primarily of CO and NO_x, with smaller amounts of PM₁₀, PM_{2.5} and other criteria and hazardous air pollutants. There would also be evaporative losses of VOCs from oil/water separators, pump and compressor seals, valves, and storage tanks. Venting and flaring could be an intermittent source of CO, NO_x, VOCs, SO₂, formaldehyde and other criteria and hazardous air pollutants. Production of the first lease area is anticipated to begin within 9 years of the first lease sale and to continue for approximately 40-60 years after, depending on the alternative (**Appendix C**). Emissions during production would be long term and would include not only production-related stationary emission sources but also intermittent and recurring emissions, such as annual construction of ice roads, and mobile sources, such as aircraft. Emissions also would occur at off-lease locations from operating the STP, the barge landing area, and the marine transport route, and from increased flight traffic at the Kaktovik airport.
- During abandonment and reclamation, the primary source of emissions would be heavy equipment used to move the gravel from roads, pads, and support facilities and diesel trucks used to haul the gravel to the reuse site or gravel mine. This would occur at the end of production for a given lease area and would result in temporary air quality effects such as short-term increases in ambient air concentrations of fugitive dust (for example, NRC 2003), nitrogen oxides, sulfur dioxide, volatile organics (including HAPs) and carbon monoxide.

The emissions described above would occur in multiple locations in the Coastal Plain during overlapping time frames as additional fields are explored, developed, put into production, and subsequently abandoned and reclaimed.

Emissions from exploration and abandonment/reclamation are expected to be lower than emissions from development and production. The emissions inventory developed for the BOEM Arctic Air Modeling Study estimated that for all phases of onshore oil and gas development (seismic surveys, exploratory drilling, and development/production), seismic survey operations accounted for less than 1 percent of each type of criteria or hazardous air pollutant emitted, and exploratory drilling accounted for less than 20 percent of VOCs and less than 10 percent of each other type of pollutant emitted (Fields Simms et al. 2014, Table VI-4). The seismic survey activities evaluated in the BOEM emissions inventory report (Fields Simms et al. 2014, page III-1) would be similar in scale to seismic survey activities in the Coastal Plain (Brumbaugh pers comm 2018); thus, potential emissions in the short term would be less than emissions in the long term, assuming that exploration ultimately led to the buildout of oil and gas facilities described by the hypothetical development scenario (**Appendix C**).

Separate from the NEPA analyses required for project-specific development proposals, ADEC would require air emission permits and dispersion modeling to assess potential impacts of specific facilities in accordance with EPA and Alaska rules and guidance. Air pollutant emissions and impacts from a proposed future project would be subject to federal and state air quality regulations under applicable statutes. In Alaska, air pollution impacts are managed by ADEC under the Alaska Air Quality Control Regulations (18 AAC 50) and the EPA-approved state implementation plan. Future projects would be required to obtain all applicable state air quality permits.

Project-specific terms and conditions required prior to authorizing any on-the-ground oil and gas activity in the program area would be determined as part of project-specific NEPA analyses and would include one or more of the following as outlined in ROP 6 (**Chapter 2**):

- Requiring the project proponent to provide a minimum of 1 year of baseline ambient air monitoring data for any pollutant(s) of concern, as determined by the BLM if no representative air monitoring data are available for the program area, or existing representative ambient air monitoring data are insufficient, incomplete, or do not meet minimum air monitoring standards set by the EPA or the ADEC.
- Preparing an emissions inventory of regulated air pollutants from all direct and indirect sources related to the proposed project, including emissions of criteria air pollutants, VOCs, hazardous air pollutants, and GHGs estimated for each year for the life of the project; the BLM would use this emissions inventory to determine pollutants of concern and the appropriate level of analysis.
- Conducting air modeling to analyze direct, indirect, and cumulative impacts, if necessary to support analysis of the proposal, based on the magnitude of the project, its proximity to Class I areas or population centers, meteorological and geographic conditions, existing air quality conditions, magnitude of existing development in the area, and issues identified during scoping.
- Providing an emissions reduction plan that includes a detailed description of operator-committed measures, if required by the BLM, to reduce project-related air emissions including, but not limited to, criteria pollutants, heavy metals, mercury, and fugitive dust.
- Conducting monitoring for the life of the project depending on the magnitude of potential air emissions from the project, proximity to population centers, or other factors.
- Implementing project changes or additional emission control strategies, as required by the BLM, in consultation with federal land managers and other appropriate federal, state, and/or local agencies, if ambient air monitoring or air quality modeling indicates that project-related emissions cause or contribute to significantly adverse effects on the surface resources, including from degradation of AQRVs and/or exceedances of the NAAQS/AAAQS, or fails to protect health (either directly or through use of subsistence resources).
- Providing air quality baseline monitoring, emissions inventory, and modeling results to the state, local communities, tribes, and other entities in a timely manner.

In addition to ROP 6, under ROP 5, all oil and gas operations (vehicles and equipment) that burn diesel fuels would be required to use “ultra-low sulfur” diesel as defined by the EPA, which would minimize emissions from these sources. ROP 5 and ROP 6 would be applied under all of the action alternatives.

Near-field Impacts on Criteria and Hazardous Air Pollutants

Near-field air quality impacts of a potential oil and gas development in the Coastal Plain are estimated by incorporating by reference a near-field modeling analysis conducted for the Willow FEIS (BLM 2023a). The Willow project is representative of a future large development in the Alaska North Slope. Alternative E of the Willow project, which includes one processing facility, three drill pads, one operating center, one airstrip, and associated infrastructure, is a conservative estimate of a future potential development in the Coastal Plain. Results from the near-field analysis conducted for Alternative E of the Willow project are used to estimate near-field impacts for a potential future project in the program area for the Coastal Plain SEIS. Impacts from a future project in the Coastal Plain are expected to be comparable or less than those from the Willow project.

The Willow near-field analysis used the EPA regulatory air dispersion model AERMOD to assess impacts on concentrations of criteria air pollutants (excluding O₃ and Pb) and select hazardous air pollutants within 31

miles (50 km) of the project. Modeling was performed for five development scenarios (construction, two pre-drilling scenarios, developmental drilling, and routine operations) which are discussed further in **Section 1.2.3** of **Appendix R**. Emissions of criteria and hazardous air pollutants during each scenario result from activities such as installation, development, and operation of wells; operation of engines and boilers; and vehicle transportation of equipment and service crews. The near-field modeling analysis used peak emissions for each source over the averaging periods assessed in AERMOD. These averaging periods are based on the form of air quality standards (NAAQS and AAAQS, see **Table 1-1** in **Appendix R**). In addition to Willow project sources, emissions from Reasonably Foreseeable Future Action (RFFA) sources within 31 miles of the project area were also included for the developmental drilling and routine operations scenarios to assess expected cumulative long-term criteria and hazardous air pollutant impacts. A summary of the modeling procedure, including emissions and meteorology, is provided in **Section 1.2.3** of **Appendix R** and a full description is provided in BLM (2023).

Impacts on criteria air pollutants were assessed for each near-field modeling scenario within the model domain and at a nearby community located approximately 25 miles from the project area (Nuiqsut). Modeled concentrations were added to background ambient concentrations and the totals were compared to applicable air quality standards. Measurement data from a nearby monitoring station was used as representative ambient air background concentrations. Near-field impacts were compared to NAAQS and AAAQS and results for each modeling scenario are provided in **Table 1-10** through **Table 1-18** in **Appendix R**. All results are below applicable air quality standards. Since the routine operations scenario modeling includes both Willow project and RFFA sources, these results are representative of cumulative near-field impacts on criteria air pollutants.

Select hazardous air pollutants, including benzene, toluene, ethylbenzene, xylenes, n-hexane, and formaldehyde were modeled for the routine operations scenario in the Willow near-field modeling. Hazardous air pollutant emissions during routine operations are substantially higher than during other scenarios (construction, drilling) and impacts were therefore only assessed for routine operations. The routine operations scenario includes Willow project sources and RFFAs, so modeling results represent cumulative hazardous air pollutant impacts. Modeled concentrations were compared to acute Reference Exposure Limits (RELs), Acute Exposure Guideline Levels (AEGs), non-cancer reference concentrations (RfCs), and the one-in a million chronic carcinogenic exposure thresholds. Modeled cumulative hazardous air pollutant impacts (from both project and RFFA sources) are below applicable thresholds and results are provided in **Table 2-19** through **Table 2-23** in **Appendix R**.

Downstream non-GHG Impacts on Air Quality and Public Health

This section incorporates by reference the downstream non-GHG air quality and public health impacts analysis performed for the 2023 Willow Master Development Plan FEIS (BLM 2023a, Appendix E.3C). The Willow project is representative of a future large development in the Alaska North Slope and thus downstream impacts from a potential future project in the Coastal Plain are expected to be comparable to or less than those from Willow. Since combustion of all petroleum products emit criteria and hazardous air pollutants, local ambient concentrations of these pollutants would likely increase in areas where petroleum products from Coastal Plain oil are combusted. The public health assessment focuses on O₃, nitrogen oxides (NO_x), SO₂, PM_{10-2.5}², PM_{2.5}, benzene, 1,3-butadiene, n-hexane, and formaldehyde as these could have either high exposure or high toxicity.

²PM_{10-2.5} is the coarse fraction of PM₁₀, i.e., PM₁₀ minus PM_{2.5}

and high roadway density (Henneman et al. 2021). Increased concentrations of criteria and hazardous air pollutants resulting from combustion could contribute to an area exceeding either national or local air quality standards. Air quality involves complex physical and chemical transformations at a local/regional level, so impacts would vary considerably depending on background concentrations, meteorology, and other local pollutant sources. Several health concerns are also connected to increased concentrations of criteria pollutants, including respiratory, cardiovascular, central nervous system, birth outcomes/development, mortality, cancer, and metabolic effects (BLM 2023a, Appendix E3.C, Table 5). The main health concerns for increased concentrations of benzene, 1,3-butadiene, n-hexane, and formaldehyde are cancer risks and impacts on the immune, nervous, respiratory, and reproductive systems. More detail on the air quality and public health impacts of downstream oil combustion are provided in BLM 2023a, Appendix E.3C.

Alternative B

Alternative B is the least restrictive of the action alternatives with all acres in the program area available for leasing and the fewest acres with NSO stipulations. The oil and gas RFD scenario for Alternative B includes four hypothetical developments in the program with a total of 4 CPFs, 14 satellite pads, and associated infrastructure (**Appendix C**). Oil production from these hypothetical developments is projected to begin in 2032 and continue until 2091. As discussed above, there would be no direct impacts under Alternative B as issuance of an oil and gas lease by itself does not authorize any on-the-ground oil and gas activities. On-the-ground activities, such as exploration, construction, development, production, reclamation and other related activities under Alternative B would result in indirect emissions of criteria and hazardous air pollutants and corresponding impacts on air quality and ARQVs that would not occur under Alternative A (No Action). The sources and types of air pollutants emitted from these on-the-ground oil and gas activities under Alternative B would be as described under *Impacts Common to All Action Alternatives*.

Peak annual criteria and hazardous air pollutant emissions from hypothetical development under Alternative B are presented in **Table 3-3**. These emissions are estimated using the annual oil production from hypothetical developments from the RFD scenario and emission rates per unit of oil production developed from Alternative E of the Willow Master Development Plan Final SEIS (BLM 2023a). A detailed description of the methods used to calculate the criteria and hazardous air pollutant emissions is provided in **Section 1.2.1.1 of Appendix R**.

Table 3-3
Peak Annual Criteria and Hazardous Air Pollutant Emissions Hypothetical Oil and Gas Development under Alternative B (tons per year).

NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}	Benzene	Toluene	Ethylbenzene	Xylene	n-Hexane	Formaldehyde
3,074	2,915	2,646	246	795	374	4	11	44	87	135	54

Notes: NO_x (nitrogen oxides); CO (carbon monoxide); VOC (volatile organic compounds); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter). Peak emissions for Alternative B occur in Year 37 of development (2059) for all pollutants except for PM₁₀, benzene, and formaldehyde, which all peak in Year 33 (2055)

Emissions of criteria and hazardous air pollutants under Alternative B would be the highest of all alternatives with the peak annual emissions being approximately 24 to 36 percent higher than Alternative C and approximately 2 to 3 times higher than Alternative D. This is due to the higher projected oil production from the hypothetical (RFD) developments under Alternative B. The emissions and impacts would also occur over the longest period under Alternative B as the lifetime of projected oil production is the longest of all alternatives (i.e., 60 years).

Typical near-field impacts for a large oil and gas development in the North Slope have been described in *Impacts Common to All Alternatives* and, as discussed, there were no modeled exceedances of NAAQS/AAAQS or hazardous air pollutant thresholds. While the Willow project (which was used as the representative project for tiering) occurs well outside the program area, modeled impacts from that project and RFFAs nearby provide an approximate measure of impacts from a similar sized project with similar RFFAs nearby occurring in the program area albeit with potentially different meteorological conditions and terrain/land cover.

Regional air quality impacts due to hypothetical oil and gas development under Alternative B are estimated using the high development scenario modeled with CAMx. Maximum cumulative modeled concentrations for criteria pollutants in the program area, Arctic National Wildlife Refuge (Arctic Refuge), Gates of the Arctic, Kaktovik, and the full modeling domain are presented in **Table 3-4**. The modeled cumulative ambient air quality concentrations under Alternative B are below the NAAQS and AAAQS for all areas of interest. There is a modeled exceedance of the annual PM_{2.5} NAAQS approximately 320 miles west of the program area near Wainwright, Alaska with a cumulative concentration of approximately 10.1 µg/m³. At this location, the modeled impact due to the hypothetical oil and gas development in the program area is 0.001 µg/m³. Therefore, the contribution of program area development to the exceedance is very low. The modeled regional impacts on the ambient air concentrations described below for Alternative B are higher than those under the No Action Alternative and are also the highest among all alternatives considered.

Figure 3-2 in Appendix A shows the spatial distribution of modeled regional impacts on ambient air NO₂ concentrations due to hypothetical oil and gas development in the program area. Peak modeled regional impacts on NO₂ concentrations are approximately 12.8 ppb under Alternative B. Similar figures with the spatial distribution of modeled impacts for other criteria pollutants and different forms of the NAAQS are presented in **Appendix A of Appendix R**. Impacts would be higher in the immediate vicinity of well pads and related infrastructure and are discussed in the *Near-field Impacts on Criteria and Hazardous Air Pollutants* section. The results presented in **Appendix A of Appendix R** indicate that the maximum impacts for all pollutants due to hypothetical oil and gas development under Alternative B are located within the program area, except for ozone whose peak impacts are located just outside the program area; ozone is a secondary pollutant that would be formed from precursor emissions of NO_x and VOC in the program area. Under Alternative B, modeled ozone impacts are up to approximately 2.2 ppb, while peak PM_{2.5} and PM₁₀ air concentration impacts are approximately 2.1 µg/m³ and 23.4 µg/m³, respectively. Additional detail for other criteria pollutants can be found in **Section 1.2.2.6 of Appendix R**.

Modeled regional impacts due to hypothetical oil and gas development under Alternative B at the location and time of the peak cumulative concentrations in each area for all criteria pollutants are presented in **Table 3-5**. In the program area, these impacts are 84 percent of the peak cumulative annual average NO₂ concentrations, 0.6 percent of the cumulative 1-hour NO₂ peak concentrations, 17 percent of the cumulative annual PM_{2.5} concentrations, 13 percent of the cumulative 24-hour PM_{2.5} concentrations and 63 percent of the cumulative 24-hour PM₁₀ concentrations. In general, at other assessment areas and the rest of modeling domain, because the peak cumulative concentrations due to all regional emission sources on the North Slope occur in locations that are far from the program area, the peak impacts under Alternative B are small or close to zero at those locations (See figures titled “High Development Scenario-Cumulative” and “High Development Scenario-Indirect Impact” in **Appendix A of Appendix R**). At Kaktovik, modeled impacts due to hypothetical oil and gas development under Alternative B represent 25 percent of the cumulative annual

Table 3-4
Modeled Cumulative Concentrations in the Hypothetical High Oil and Gas Development Scenario under Alternative B

	CO		NO ₂		O ₃	PM _{2.5}		PM ₁₀	SO ₂	
	8 hours	1 hour	1 hour	Annual	8 hours	Annual	24 hours	24 hours	1 hour	3 hours
	ppm	ppm	ppb	ppb	ppb	µg/m ³	µg/m ³	µg/m ³	ppb	ppm
Primary NAAQS and AAAQS^a	9	35	100	53	70	9	35	150	75	0.5
Secondary NAAQS	NA	NA	NA	53	70	15	35	150	NA	0.5
Modeled Concentrations										
Program Area	0.18	0.18	18.24	3.53	43.47	2.91	6.74	29.30	0.85	0.0008
Arctic National Wildlife Refuge (excluding Program Area)	0.44	0.62	3.86	0.61	56.29	2.51	5.92	30.48	0.74	0.0021
Gates of the Arctic	0.17	0.18	1.23	0.19	53.44	1.44	3.92	9.88	0.68	0.0009
Kaktovik	0.17	0.17	5.22	0.57	39.26	2.25	7.26	14.29	0.29	0.0003
Full Domain ¹	0.90	3.08	72.39	22.02	56.29	10.05	31.35	121.33	58.07	0.0574

Notes: CO (carbon monoxide); NO₂ (nitrogen dioxide); O₃ (ozone); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter) ; µg/m³ = micrograms per cubic meter; NAAQS (National Ambient Air Quality Standards); AAAQS (Alaska Ambient Air Quality Standards)

NA indicates "not applicable"

¹ Full Domain values represent the maximum modeled concentration in the numerical form of the air quality standard in the entire modeling domain.

^a AAAQS are presented in units consistent with the Primary NAAQS to assist with comparison to modeled impacts.

Table 3-5
Modeled Impacts due to Hypothetical Oil and Gas Development under Alternative B at the location and time of the peak cumulative impact in each area.

	CO		NO ₂		O ₃	PM _{2.5}		PM ₁₀	SO ₂	
	8 hours	1 hour	1 hour	Annual	8 hours	Annual	24 hours	24 hours	1 hour	3 hours
	ppm	ppm	ppb	ppb	ppb	µg/m ³	µg/m ³	µg/m ³	ppb	ppm
Primary NAAQS and AAAQS^a	9	35	100	53	70	9	35	150	75	0.5
Secondary NAAQS	NA	NA	NA	53	70	15	35	150	NA	0.5
Modeled Concentrations										
Program Area	0.000	0.000	0.090	2.947	0.004	0.487	0.873	18.435	0.386	0.00026
Arctic National Wildlife Refuge (excluding Program Area)	0.000	0.000	0.894	0.003	0.001	0.029	0.014	0.000	0.000	0.00000
Gates of the Arctic	0.000	0.000	0.000	0.002	0.005	0.002	0.000	0.001	0.000	0.00000
Kaktovik	0.000	0.000	0.000	0.137	0.000	0.050	0.006	0.003	0.007	0.00003
Full Domain ¹	0.000	0.000	0.000	0.003	0.001	0.001	0.000	0.000	0.000	0.00000

Notes: CO (carbon monoxide); NO₂ (nitrogen dioxide); O₃ (ozone); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter); µg/m³ = micrograms per cubic meter; NAAQS (National Ambient Air Quality Standards); AAAQS (Alaska Ambient Air Quality Standards)

NA indicates "not applicable"

¹ Full Domain values represent the maximum modeled concentration in the numerical form of the air quality standard in the entire modeling domain.

^a AAAQS are presented in units consistent with the Primary NAAQS to assist with comparison to modeled impacts.

average NO₂ concentrations, 2 percent of the cumulative annual PM_{2.5} concentration, 0.2 percent of the cumulative 24-hour PM_{2.5} concentration and 3 percent of the cumulative 1-hour SO₂ concentrations. Modeled impacts at Kaktovik for other pollutants and forms of the NAAQS are close to zero.

Modeled nitrogen and sulfur cumulative deposition fluxes due to the hypothetical oil and gas development under Alternative B are presented in **Table 3-6** for the program area, Arctic Refuge excluding the program area, and Gates of the Arctic. Under Alternative B, cumulative nitrogen deposition fluxes are below or within the critical load range across the areas assessed. Cumulative annual sulfur deposition at the three areas is up to 0.7 kg S/ha-yr. Spatial maps of modeled cumulative nitrogen and sulfur deposition are provided in **Appendix A** of **Appendix R**.

Table 3-6
Modeled Cumulative Deposition under Alternative B

Assessment Area	Nitrogen (kg N/ha-yr)			Sulfur (kg S/ha-yr)	
	Maximum	Average	Below/Within/Above Critical Load Range (1.0-3.0 kg/ha-yr)	Maximum	Average
Arctic National Wildlife Refuge (excluding Program Area)	0.67	0.33	Below	0.71	0.32
Program Area	2.05	0.63	Within	0.58	0.28
Gates of the Arctic	0.59	0.38	Below	0.68	0.37

Visibility impairment is assessed at the nearest Class I area, Denali National Park. Since Denali is outside the modeling domain, modeled visibility impacts at Gates of the Arctic (the closest area to Denali within the domain) are used as a surrogate for evaluation using visibility parameters for Denali. Modeled visibility impacts due to the hypothetical oil and gas development under Alternative B at Gates of the Arctic are presented in **Table 3-7**. Under Alternative B, slight visibility degradation is expected with the 0.5 Δ dv threshold exceeded for three days out of 365. The visibility impacts at Denali NP are expected to be lower than those shown here at Gates of the Arctic since Denali is farther away from any oil and gas development that would occur in the program area.

Table 3-7
Visibility Impacts due to Hypothetical Oil and Gas Development under Alternative B

Assessment Area	Δ dv (Max)	Δ dv (98 th percentile)	Δ dv (W20 ^a)	Δ dv (B20 ^b)	Number of Days	
					Δ dv > 1	Δ dv > 0.5
Gates of the Arctic ^c	0.936	0.280	0.072	0.000	0	3

Notes: Δ dv (delta deciview); B20 (20% Best Visibility days); W20 (20% Worst Visibility days)

^a Average of the Delta-deciview values for days in a full year above the 80th percentile (20% worst visibility days).

^b Average of the Delta-deciview values for days in a full year below the 20th percentile (20% best visibility days).

^c Gates of the Arctic is the closest area to Denali NP that is within the 4 km modeling domain and its modeled impacts serve as surrogate impacts for Denali NP

Alternative C

Alternative C is more restrictive than Alternative B with 526,300 acres made not available for leasing (approximately 34 percent of the program area) and additional acres subject to NSO and CSU relative to Alternative B. The RFD scenario for Alternative C includes three hypothetical developments with a total of two CPFs, 9 satellite pads, and associated infrastructure. Oil production in the RFD scenario for Alternative C begins in 2032 and continues through 2085. As discussed above, no direct impacts on air quality or AQRVs would occur from leasing under Alternative C or the other alternatives. Oil and gas exploration, development, production, and related activities under Alternative C would result in indirect emissions of criteria and

hazardous air pollutants and corresponding impacts on air quality and ARQVs. These impacts would not occur under Alternative A. The sources and types of air pollutants emitted from these oil and gas activities would be the same as those described for Alternative B and under *Impacts Common to All Action Alternatives*.

Peak annual criteria and hazardous air pollutant emissions from hypothetical development under Alternative C are presented in **Table 3-8**. A detailed description of the methods used to calculate the criteria and hazardous air pollutant emissions is provided in **Section 1.2.1.1** of **Appendix R**.

Table 3-8
Peak Annual Criteria and Hazardous Air Pollutant Emissions Hypothetical Oil and Gas Development under Alternative C (tons per year).

NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}	Benzene	Toluene	Ethyl-benzene	Xylene	n-Hexane	Formaldehyde
2,488	2,360	2,018	200	645	303	3	9	33	64	101	44

Notes: NO_x (nitrogen oxides); CO (carbon monoxide); VOC (volatile organic compounds); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter). Peak emissions for Alternative C occur in Year 37 of development (2059) for all pollutants except for formaldehyde, which peaks in Year 20 (2042)

Peak annual emissions of criteria and hazardous air pollutants under Alternative C would be approximately 19 to 26 percent lower than Alternative B and approximately 1.5 to 2.5 times higher than Alternative D due to higher and lower peak oil production, respectively. The projected lifetime of production under Alternative C (54 years) is shorter than Alternative B (61 years) and longer than Alternative D (42 years), and thus emissions and impacts would occur over shorter and longer periods, respectively.

Typical near-field impacts for a large oil and gas development in the North Slope have been described in *Impacts Common to All Alternatives* and, as discussed, there were no modeled exceedances of NAAQS/AAAQS or hazardous air pollutant thresholds.

Regional air quality impacts due to hypothetical oil and gas development under Alternative C were not modeled. However, as stated above the peak emissions for air pollutants under Alternative C are lower than Alternative B which was modeled with CAMx. For instance, under Alternative B, emissions for NO_x and PM_{2.5} are 23 percent higher, while VOC emissions are 31 percent higher than those pollutants' emissions under Alternative C. In general, air quality and AQRV impacts under Alternative C are expected to be lower than the modeled impacts under Alternative B discussed above, but higher than the modeled impacts under Alternative D discussed below. Since the Alternative B maximum cumulative modeled concentrations for criteria pollutants in the program area, rest of the Arctic Refuge, Gates of the Arctic, Kaktovik, and the full domain are below the NAAQS and AAAQS. As noted previously, there is a modeled exceedance of the annual PM_{2.5} NAAQS approximately 320 miles west of the program area near Wainwright, Alaska. The contribution of program area development to the exceedance is very low. It is expected that there will be no exceedances to air quality standards due to potential development under Alternative C. The air quality and AQRV impacts under Alternative C would be higher than those under Alternative A.

Alternative D

Alternative D is more restrictive than Alternative C with 797,700 acres not available for leasing (approximately 51 percent of the program area) and 726,300 acres subject to NSO. The RFD scenario for Alternative D includes one CPF, 6 satellite pads, and associated infrastructure. As with the other alternatives, no direct emissions or impacts on air quality or AQRVs would occur under Alternative D; indirect emissions of criteria and hazardous air pollutants would result from oil and gas activities that would not occur under

Alternative A. The sources and types of air pollutants emitted from these oil and gas activities would be the same as those described for Alternative B and under *Impacts Common to All Action Alternatives*.

Peak annual criteria and hazardous air pollutant emissions from hypothetical development under Alternative D are presented in **Table 3-9** (see **Section 1.2.1.1** of **Appendix R** for a more detailed discussion of the emissions inventory).

Table 3-9
Peak Annual Criteria and Hazardous Air Pollutant Emissions Hypothetical Oil and Gas Development under Alternative D (tons per year).

NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}	Benzene	Toluene	Ethyl-benzene	Xylene	n-Hexane	Formaldehyde
1,011	956	1,154	79	258	121	2	4	22	43	62	17

Notes: NO_x (nitrogen oxides); CO (carbon monoxide); VOC (volatile organic compounds); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter). Peak emissions for Alternative D occur in Year 31 of development (2053) for all pollutants except for Formaldehyde, which peaks in Year 14 (2036).

Emissions of criteria and hazardous air pollutants under Alternative D would be lower than Alternatives B and C with the peak annual emissions approximately 50 to 70 percent lower than Alternative B and approximately 30 to 60 percent lower than Alternative C, depending on the pollutant. This is due to the lower projected oil production from the hypothetical developments under Alternative D. The emissions and impacts would also occur over the shortest period under Alternative D as the lifetime of projected oil production in the RFD scenario is the shortest of all alternatives (i.e., 42 years).

Regional air quality impacts due to hypothetical oil and gas development under Alternative D are estimated using the low development scenario modeled with CAMx. Notice that peak emissions under Alternative D for most pollutants are higher than those considered in the hypothetical low oil and gas development scenario modeled with CAMx. For instance, under Alternative D emissions for NO_x and PM_{2.5} are 30 percent higher, while VOC emissions are 62 percent higher than those pollutants' emissions modeled in the low development scenario. In general, air quality and AQRV impacts under Alternative D are expected to be higher than impacts modeled under the low development scenario presented here and in **Section 1.2.2.6** of **Appendix R**, and lower than the modeled high development scenario. Maximum cumulative modeled concentrations for criteria pollutants in the program area, the rest of the Arctic Refuge, Gates of the Arctic, Kaktovik and the full domain are presented in **Table 3-10**. The modeled impacts on these ambient air concentrations described below for Alternative D are higher than those under the Alternative A, but lower than both Alternative B and Alternative C. Also as noted above, impacts would be higher in the vicinity of well pads and related infrastructure and are discussed in the *Near-field Impacts on Criteria and Hazardous Air Pollutants* section.

Alternative D impacts would be between modeled impacts in the low development scenario (discussed below) and the modeled impacts in the high development scenario (discussed under Alternative B).

Figure 3-3 in **Appendix A** shows the spatial distribution of modeled regional impacts on ambient air NO₂ concentrations in the hypothetical low oil and gas development scenario in the program area. Peak modeled regional impacts on NO₂ concentrations are approximately 6.8 ppb. Similar figures with the spatial distribution of modeled impacts for other criteria pollutants and different forms of the NAAQS are presented in **Appendix A** of **Appendix R**. The results presented in **Appendix A** of **Appendix R** indicate that the

Table 3-10
Modeled Cumulative Concentrations in the Hypothetical Low Oil and Gas Development Scenario

	CO	NO ₂	O ₃	PM _{2.5}	PM ₁₀	SO ₂				
	8 hours	1 hour	1 hour	Annual	8 hours	Annual	24 hours	24 hours	1 hour	3 hours
	ppm	ppm	Ppb	ppb	ppb	µg/m ³	µg/m ³	µg/m ³	ppb	ppm
Primary NAAQS and AAAQS^a	9	35	100	53	70	9	35	150	75	0.5
Secondary NAAQS	NA	NA	NA	53	70	15	35	150	NA	0.5
Modeled Concentrations										
Program Area	0.18	0.18	18.18	2.72	43.46	2.75	6.70	23.41	0.68	0.0007
Arctic National Wildlife Refuge (excluding Program Area)	0.44	0.62	2.97	0.61	56.29	2.49	5.91	30.48	0.74	0.0021
Gates of the Arctic	0.17	0.18	1.23	0.19	53.43	1.43	3.92	9.88	0.68	0.0009
Kaktovik	0.17	0.17	5.22	0.48	39.26	2.22	7.26	14.29	0.28	0.0003
Full Domain ¹	0.90	3.08	72.39	22.02	56.29	10.05	31.35	121.33	58.07	0.0574

Notes: CO (carbon monoxide); NO₂ (nitrogen dioxide); O₃ (ozone); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter); µg/m³ = micrograms per cubic meter; NAAQS (National Ambient Air Quality Standards); AAAQS (Alaska Ambient Air Quality Standards)

NA indicates "not applicable"

¹ Full Domain values represent the maximum modeled concentration in the numerical form of the air quality standard in the entire modeling domain.

^a AAAQS are presented in units consistent with the Primary NAAQS to assist with comparison to modeled impacts.

maximum impacts for all pollutants due to the hypothetical low oil and gas development scenario are located within the program area, except for ozone whose peak impacts are located just outside the program area. Under this alternative, modeled peak ozone impacts are approximately 0.8 ppb, while peak PM_{2.5} and PM₁₀ impacts are less than 1.5 µg/m³ and 16.4 µg/m³, respectively. Additional detail for other criteria pollutants can be found in **Section 1.2.2.6 of Appendix R**.

Modeled regional impacts due to the hypothetical low oil and gas development at the location and time of the peak cumulative concentrations in each area for all criteria pollutants are presented in **Table 3-11**. In the program area, these impacts are 79 percent of the cumulative annual average NO₂ concentrations, 0.1 percent of the cumulative 1-hour NO₂ peak concentrations, 12 percent of the cumulative annual PM_{2.5} concentrations, 12 percent of the cumulative 24-hour PM_{2.5} concentrations and 54 percent of the cumulative 24-hour PM₁₀ concentrations. In general, at other assessment areas and the rest of modeling domain, because the peak cumulative concentrations due to all regional emission sources on the North Slope occur in locations that are far from the program area, the peak impacts are small or close to zero at those locations (See figures titled “Low Development Scenario-Cumulative” and “Low Development Scenario-Indirect Impact” in **Appendix A of Appendix R**). At Kaktovik, modeled impacts due to hypothetical oil and gas development represent 9 percent of the cumulative annual average NO₂ concentrations, 1 percent of the cumulative annual PM_{2.5} concentrations and 0.02 percent of the cumulative 24-hour PM_{2.5} concentrations. Modeled impacts at Kaktovik for all other pollutants and forms of the NAAQS are close to zero. Overall, the regional air quality impacts of oil and gas development under Alternative D would be lower than both Alternative B and Alternative C.

Modeled nitrogen and sulfur cumulative deposition fluxes in the hypothetical low oil and gas development scenario are presented in **Table 3-12** for the program area, Arctic Refuge, and Gates of the Arctic. Modeled cumulative nitrogen deposition fluxes are below or within the critical load range across the areas assessed. Maximum annual cumulative sulfur deposition at the three areas is up to 0.7 kg S/ha-yr. Spatial maps of modeled cumulative nitrogen and sulfur deposition are provided in **Appendix A of Appendix R**.

Visibility impairment is assessed at the nearest Class I area, Denali National Park. Since Denali is outside the modeling domain, modeled visibility impacts at Gates of the Arctic (the closest area to Denali within the domain) are used as a surrogate for evaluation using visibility parameters for Denali. Modeled visibility impacts in the hypothetical low oil and gas development scenario at Gates of the Arctic are presented in **Table 3-13**. There are no exceedances to either the 1 Δdv and 0.5 Δdv thresholds. The visibility impacts at Denali NP are expected to be lower than those shown here at the Gates of the Arctic because Denali is farther away from any oil and gas development that would occur in the program area. Overall, the visibility impacts due to oil and gas development under Alternative D would be lower than those from Alternative B and Alternative C.

Table 3-11
Modeled Impacts due to the Hypothetical Low Oil and Gas Development Scenario at the location and time of the peak cumulative impact in each area.

	CO	NO ₂	O ₃	PM _{2.5}	PM ₁₀	SO ₂				
	8 hours	1 hour	1 hour	Annual	8 hours	Annual	24 hours	24 hours	1 hour	3 hours
	ppm	ppm	Ppb	ppb	ppb	µg/m ³	µg/m ³	µg/m ³	ppb	ppm
Primary NAAQS and AAAQS^a	9	35	100	53	70	9	35	150	75	0.5
Secondary NAAQS	NA	NA	NA	53	70	15	35	150	NA	0.5
Modeled Concentrations										
Program Area	0.000	0.000	0.025	2.141	0.001	0.323	0.837	12.545	0.219	0.00019
Arctic National Wildlife Refuge (excluding Program Area)	0.000	0.000	0.000	0.001	0.000	0.006	0.002	0.000	0.000	0.00000
Gates of the Arctic	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.000	0.00000
Kaktovik	0.000	0.000	0.000	0.045	0.000	0.015	0.001	0.001	0.000	0.00000
Full Domain ¹	0.000	0.000	0.000	0.001	0.000	0.000	0.000	0.000	0.000	0.00000

Notes: CO (carbon monoxide); NO₂ (nitrogen dioxide); O₃ (ozone); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter); µg/m³ = micrograms per cubic meter; NAAQS (National Ambient Air Quality Standards); AAAQS (Alaska Ambient Air Quality Standards)

NA indicates "not applicable"

¹ Full Domain values represent the maximum modeled concentration in the numerical form of the air quality standard in the entire modeling domain.

^a AAAQS are presented in units consistent with the Primary NAAQS to assist with comparison to modeled impacts.

Table 3-12
Cumulative Deposition in the Hypothetical Low Oil and Gas Development Scenario

Assessment Area	Nitrogen (kg N/ha-yr)			Sulfur (kg S/ha-yr)	
	Maximum	Average	Below/Within/Above Critical Load Range (1.0-3.0 kg/ha-yr)	Maximum	Average
Arctic National Wildlife Refuge (excluding Program Area)	0.66	0.33	Below	0.71	0.32
Program Area	1.44	0.51	Within	0.43	0.26
Gates of the Arctic	0.59	0.38	Below	0.68	0.37

Table 3-13
Visibility Impacts in the Hypothetical Low Oil and Gas Development Scenario

Assessment Area	Δdv (Max)	Δdv (98 th percentile)	Δdv (W20 ^a)	Δdv (B20 ^b)	Number of Days	
					$\Delta dv > 1$	$\Delta dv > 0.5$
Gates of the Arctic ^c	0.243	0.074	0.018	0.000	0	0

Notes: Δdv (delta deciview); B20 (20% Best visibility days); W20 (20% Worst visibility days)

^a Average of the Delta-deciview values for days in a full year above the 80th percentile (20% worst visibility days).

^b Average of the Delta-deciview values for days in a full year below the 20th percentile (20% best visibility days).

^c Gates of the Arctic is the closest area to Denali NP that is within the 4 km modeling domain and its modeled impacts serve as surrogate impacts for Denali NP

Alternative D2

Alternative D2 is the most restrictive of all action alternatives, limiting the leasable area to 400,000 acres and applying NSO stipulations to 231,700 acres of that leasable area. Alternative D2 additionally constrains hypothetical development to areas identified as available subject to standard terms and conditions (STC), which comprise 80,900 acres. The RFD scenario for Alternative D2 includes one CPF, three satellite pads, and associated infrastructure. Oil production would begin in 2032 and continue through 2070. As with the other alternatives, no direct emissions or impacts on air quality or AQRVs would occur under Alternative D2; indirect emissions of criteria and hazardous air pollutants would result from oil and gas activities that would not occur under Alternative A. The sources and types of air pollutants emitted from these oil and gas activities would be the same as those described for Alternative B and under *Impacts Common to All Action Alternatives*.

Peak annual criteria and hazardous air pollutant emissions from hypothetical development under Alternative D2 are presented in **Table 3-14** (see **Section 1.2.1.1 of Appendix R** for a more detailed discussion of the emissions inventory).

Table 3-14
Peak Annual Criteria and Hazardous Air Pollutant Emissions Hypothetical Oil and Gas Development under Alternative D2 (tons per year)

NO _x	CO	VOC	SO ₂	PM ₁₀	PM _{2.5}	Benzene	Toluene	Ethylbenzene	Xylene	n-Hexane	Formaldehyde
735	697	596	59	190	89	1	3	10	19	30	13

Notes: NO_x (nitrogen oxides); CO (carbon monoxide); VOC (volatile organic compounds); SO₂ (sulfur dioxide); PM₁₀ (particulate matter less than 10 micron in aerodynamic diameter); PM_{2.5} (particulate matter less than 2.5 micron in aerodynamic diameter). Peak emissions for Alternative D2 occur in Year 37 of development (2059) for all pollutants except for PM₁₀, benzene, and formaldehyde, which all peak in Year 13 (2035)

Emissions of criteria and hazardous air pollutants under Alternative D2 would be the lowest of all alternatives. Peak annual emissions of criteria and hazardous air pollutants under Alternative D2 would be approximately

73 to 78 percent lower than Alternative B and approximately 24 to 56 percent lower than Alternative D. This is due to the lower projected oil production from the hypothetical development under Alternative D2. Under D2, the emissions and impacts would also occur over the shortest period as the lifetime of projected oil production in the RFD scenario is the shortest of all action alternatives (39 years).

Typical near-field impacts for a large oil and gas development in the North Slope have been described in *Impacts Common to All Alternatives* and, as discussed, there were no modeled exceedances of NAAQS/AAQs or hazardous air pollutant thresholds.

Regional air quality impacts due to hypothetical oil and gas development under Alternative D2 were not modeled and are assessed qualitatively below. The air quality and air quality related value impacts are estimated to be lower than the hypothetical low development scenario modeled with CAMx due to lower projected development and emissions. In the low development scenario, emissions are modeled based on the base case cumulative emissions and additional emissions from one potential future development that includes one CPF, four well pads, and associated infrastructure. Because Alternative D2 has fewer potential satellite well pads (i.e., three potential well pads), the impacts to air quality and air quality related values would be lower than impacts modeled under the low development scenario presented here and in **Section 1.2.2.6 of Appendix R**. Notice that peak emissions under Alternative D2 for most pollutants are lower than those considered in the hypothetical low oil and gas development scenario modeled with CAMx (**Table 1-10 of Appendix R**). For instance, under Alternative D2 emissions, NO_x and PM_{2.5} are 4 to 5 percent lower, while VOC emissions are 16 percent lower than those pollutants' emissions modeled in the low development scenario. Maximum cumulative modeled concentrations for criteria pollutants in the program area, the rest of the Arctic Refuge, Gates of the Arctic, Kaktovik, and the full domain are presented in **Table 3-10**.

Maximum cumulative modeled concentrations for criteria pollutants in the program area, as well as the Arctic Refuge, Gates of the Arctic, Kaktovik, and the full domain, are below the NAAQS and AAQs for the hypothetical low development scenario. There is a modeled exceedance of the annual PM_{2.5} NAAQS approximately 320 miles west of the program area near Wainwright, Alaska with a modeled impact of 0.001 µg/m³. The contribution of program area development to the exceedance would be very low. It is expected that there will be no exceedances to air quality standards due to potential development under Alternative D2. The air quality and AQRV impacts under Alternative D2 would be higher than those under Alternative A, as discussed above.

Transboundary Impacts

Future oil and gas development in the Coastal Plain was evaluated to determine the potential for transboundary air quality impacts within Canada. The Coastal Plain program area is approximately 30 miles from Canada at its nearest point and slightly under 125 miles at its most distant point. The wind rose in **Figure 3-1 in Appendix A** shows that wind direction recorded at the Barter Island station is bimodal, occurring from both the east and the west, with annual average wind direction more from the east. Monthly wind rose data show that westerly winds are more predominant from November through March, while easterly winds are more predominant from April through October and especially from May through July (IEM 2019). Emissions from oil and gas development in the Coastal Plain have the potential to transport air pollutants into Canada and have transboundary effects, particularly in those months with more westerly winds.

Cumulative Impacts

The cumulative effects analysis area for air quality includes the North Slope and the areas described under *Affected Environment (Appendix B)* as sensitive in the context of preserving visitor experience, including the

Arctic National Wildfire Refuge and Gates of the Arctic National Park. The nearest federal Class I area is Denali National Park and Preserve which is about 425 miles southwest of the Coastal Plain.

Potential cumulative impacts on air quality and AQRVs over the life of this EIS would result from emissions from existing sources in combination with emissions from hypothetical oil and developments in the program area and the RFFAs described in **Appendix G**. Emissions and impacts from hypothetical oil and gas developments in the program area are discussed in the *Direct and Indirect Impacts* section above. Emissions from onshore oil and gas RFFA are quantified where information was available and presented in **Section 1.3** of **Appendix R**.

Near-field impacts on criteria and hazardous air pollutants are described in the *Direct and Indirect Impacts* section for a large hypothetical oil and gas development in the North Slope through tiering to the modeling performed for the Willow project (BLM 2023a). The modeling included both Willow project sources and other RFFA sources within approximately 50 km (31 miles) of the development. Thus, the results shown in **Table 1-26** and **Table 1-31** in **Appendix R** are representative of cumulative near-field criteria and hazardous air pollutant impacts and indicate that there would likely be no modeled exceedances of NAAQS/AAAQS or hazardous air pollutant thresholds for a similarly sized project with similar RFFAs nearby occurring in the program area.

As discussed in the *Direct and Indirect Impacts* section, the regional modeling performed to assess impacts on air quality and AQRV impacts includes emissions from both hypothetical oil and gas developments in the program area and other current and future cumulative emission sources. The emissions inventory for the modeling was based on the BOEM Arctic Air Quality Modeling Study (Fields Simms et al. 2018; Stoeckenius et al. 2017) with updates made in the Willow EIS (BLM 2023a) to account for additional known future projects. The inventory includes anthropogenic emissions from onshore sources in the North Slope (e.g., oil and gas production and exploration, airports, pipelines, and non-oil and gas-related stationary and mobile sources) and offshore sources in adjacent waters (e.g., drilling rigs, survey/drilling vessels and aircraft, and commercial vessels) as well as natural emissions (e.g., sea salt, fire, biogenic, and lightning-related emissions). The effects of international sources through long-range transport into Alaska are also accounted using background concentrations from a global chemical transport model that provides concentrations at the lateral edges of the computational domain (boundary concentrations).

The modeled cumulative air quality concentrations for all criteria pollutants are below the NAAQS and AAAQS in the program area, Kaktovik, nearby Class II areas, and across the entire modeling domain under both the hypothetical high and low oil and gas development scenarios. The cumulative nitrogen deposition rates in the program area under both the low and high scenarios are within the range of critical loads (1.0 to 3.0 kg N/ha-yr) and below the range of critical loads in the Arctic National Wildfire Refuge (excluding the program area) and Gates of the Arctic. The modeled maximum cumulative sulfur deposition impacts in the program area and nearby Class II areas range from 0.6 to 0.7 kg S/ha-yr while average sulfur deposition impacts range from 0.3 to 0.4 kg S/ha-yr. Potential visibility impacts in Denali National Park (the closest Class I area to the program area) from hypothetical oil and gas developments in the program area were assessed using modeled impacts at Gates of the Arctic as a surrogate, as it is the closest area to Denali within the modeling domain. The modeling indicates that cumulative visibility impairment in Denali National Park would potentially increase in the future due to the impacts from oil and gas development shown in **Table 3-7** and **Table 3-13**. The visibility impacts at Denali NP would be lower than those shown as it is farther away than Gates of the Arctic from any oil and gas development that would occur in the program area.

3.2.3 Acoustic Environment

The acoustic environment, or soundscape, is the combination of all sounds in a given area. These include natural sounds, such as from wind and water and those sounds caused by insects, birds, other wildlife, and humans. Human-caused sounds are considered noise because they have the potential to affect the natural acoustical environment and the noise-sensitive resources in that environment. Noise-sensitive resources include human receptors that may be affected by oil and gas-related activities in the Coastal Plain. Also included are terrestrial wildlife, marine mammals, fish and aquatic species, and numerous bird species. Some of these species are important subsistence resources for rural residents and for residents of Kaktovik, including those engaged in subsistence activities in the Coastal Plain beyond the village itself. Such resources are also important for visitors to the Coastal Plain, such as wilderness values in congressionally designated Wilderness that borders the Coastal Plain to the south and east. An example is the opportunity to experience solitude, with the absence of human-caused noise.

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on-the-ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such on-the-ground activities could include seismic surveys and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on the acoustic environment from on-the-ground activities.

Impacts from noise are characterized by their effects on wildlife and the human environment. Impacts are most concentrated in places that are highly populated, highly sensitive to sound, or of disproportionate importance to people or wildlife. The village of Kaktovik is the only permanent settlement within the program area, though the broader Coastal Plain is used for a variety of subsistence activities, most notably hunting. The program area provides habitat for a number of species that are particularly susceptible to noise disturbance, as follows: bowhead whales, especially during fall migration; polar bears, especially during denning; caribou, especially during calving and post-calving; and migratory birds, especially during breeding and brood-rearing activities. Migrating bowhead whales avoid areas where the noise from exploratory drilling and marine seismic exploration exceeds 117 to 135 dB (NAS 2003). Noise impacts specific to wildlife and subsistence users, and the differences of impacts among alternatives, are analyzed more fully in those resource sections.

Methods of estimating noise impacts described in the GMT2 Final SEIS analysis (BLM 2018a, Section 4.2.3.3) are applicable to this EIS. In evaluating potential impacts of future project-related noise, it is necessary to consider noise levels in relation to existing ambient sound levels at the location of the receptor:

- Noise that is 10 or more dBA below the existing ambient sound level likely would be inaudible to the human ear.
- Noise that is approximately equal to existing ambient sound level would only be marginally or slightly audible, depending on the hearing capabilities of the individual receptor.
- Noise that is 10 dBA or greater above existing ambient sound level would become the dominant element of the acoustical environment.

- Noise levels of 40 dBA would be readily audible in a setting with an existing ambient sound level of 35 dBA or less, but likely would be inaudible in a setting where the existing ambient sound level is 50 dBA or more.

Noise levels generally associated with vehicles and equipment that would be used during exploration, development, production, and abandonment and reclamation are provided in **Table 3-15**, below. Sound levels referenced in the alternatives analysis all refer to this table and are all 1,000 feet from the noise source. Note that actual attenuation distances would depend on the variables described under *Sound Propagation Through Air*, above.

Noise sources may be impulsive or non-impulsive. Sound levels generated by impulsive noise, such as pile driving or blasting, may significantly exceed the ambient sound level for a very short duration. Non-impulsive, more continuous noise sources, such as well production, typically emit lower levels of noise and are less likely to be audible at a distance. Multiple individual noise sources can combine to result in higher noise levels, but the combined noise is not additive. Combined noise sources that differ more than 10 dBA from one another are dominated by the louder source.

Table 3-15
Summary of Noise Levels for Project Equipment

Noise Source	Phase	Estimated Sound 1,000 Feet from the Source (dBA) ^a	Distance to 35 dBA (mi)	Distance to 23 dBA ^b (mi)	Source ^c
Construction equipment (5 pieces of equipment)	E, D, AR	62	4.2	16.8	BLM 2018a
Construction equipment (heavy, single equipment)	All	48–75	1.3–3.8	5.3–15	FHWA 2006
Impact pile driving (Lmax)	D	84	53	212	USACE 2018
Drill rig (Lmax)	E, D	84.4	56	222	BLM 2018a
Drill rig (median)	E, D	52.4	1.4	5.5	BLM 2018a
Gravel mining	D	62	4.2	16.8	BLM 2018a
Gravel blasting (Lmax)	D	90	102	424	USACE 2018
Helicopters	D, P	70–80	10.6–33.6	42–134	USACE 2018
Fixed-wing aircraft (twin engine)	D, P	69–81	9.5–37.8	38–150	USACE 2018
Tugboats, marine vessels, barges	D, P	40	0.3	1.3	BLM 2018a
Central processing facility	P	36–64	0–5.3	0.8–21	USACE 2018
Flaring at CPF	P	71	12	47.6	USACE 2018

Source: BLM 2018a

Note: dBA (decibels); mi (miles); Lmax (short-term, maximum sound level); E (exploration); D (development); P (production); AR (abandonment/reclamation)

^a Unmitigated sound level

^b 23 dBA is the minimum ambient sound level in the analysis area, based on USACE 2012.

^c Sound levels in original sources are converted to sound levels at 1,000 feet.

Alternative A

Under Alternative A, no federal minerals in the Coastal Plain would be offered for future oil and gas lease sales, and no changes would occur to the ambient noise environment as a result of future oil and gas development in the Coastal Plain. Alternative A would not have direct or indirect impacts on the acoustic environment related to aircraft, and would retain background noise levels, which include the effect of noise generated by approximately nine flights per day to and from the Kaktovik Airport.

Impacts Common to All Action Alternatives

The nature and type of impacts would be similar across action alternatives. The primary noise sources associated with future oil and gas development are ground-based equipment, vessel and barge traffic, and aircraft. Impacts common to all action alternatives from these primary noise sources are described below; potential impacts by development phase under each alternative are discussed in the following section.

Ground-Based Equipment and Activities

Sources of noise associated with fluid mineral development are from construction, operation, and support activities for oil and gas wells. Construction activities contribute shorter term, temporary noises associated with the initial exploration and development of oil and gas infrastructure. This includes the construction of new roads, the use of vehicles and equipment to construct wells, and the drilling of wells. Blasting at gravel pits and pile installation provide the greatest source of sound and vibration impacts but are intermittent noise sources. Production activities provide a long-term source of noise at generally lower levels than construction. Plugging and capping wells and removing oil and gas infrastructure during the abandonment and reclamation phase of fluid mineral development also would result in short-term construction-related noise. Off-site ancillary infrastructure along the coast, including a STP and barge landing and offloading, would be sources of noise along the coast at these locations.

Vessel Traffic. Vessel traffic would be a lesser source of noise but would extend noise impacts into the marine environment along the entire 1,600-nautical-mile marine barge route; there would be underwater-radiated noise effects from commercial ships. These impacts would be short term and infrequent, with only two trips anticipated per year.

Aircraft Traffic. Kaktovik Airport is approximately 1 mile from the village of Kaktovik and is the nearest and most central airport to the program area. The amount of air traffic through Kaktovik and routing aircraft through the region could be strongly influenced by the future construction of additional airstrips in the program area. It is difficult to estimate the magnitude of aircraft use that would result from enabling fluid mineral activity in the Coastal Plain; the rate of development and potential use of ships or vehicles on new roads are two key uncertainties that would affect air traffic.

A highly conservative estimate of the level of air traffic related to oil and gas activities in the region is represented by Deadhorse Airport, which serves as the primary hub for oil and gas activities on the North Slope of Alaska. The FAA's Airport Master Records for this airport, which provides key air connections to Fairbanks and Anchorage, report a 12-month average of 91 flights per day, relative to Kaktovik Airport's average of 9 flights per day (FAA 2024a, 2024b). A 2010 USACE noise analysis that reported aircraft noise levels on the order of one event per hour is consistent with these numbers; however, the 2010 analysis could have captured elevated levels of air traffic on the western portions of the program area from air traffic at other airports (USACE 2012, Section 5.20.8).

In addition to the air traffic into Kaktovik, support activities using helicopters are likely to be enabled by leasing. Currently, the BLM and USFWS permit a very small number of helicopter landings in the Arctic Refuge, mostly related to scientific research and photography.

The noise reduction estimates tabulated as part of the GMT2 Final SEIS analysis (BLM 2018a, Table 110) suggest that air traffic could be discernable 5 to 10 miles from the source of the loudest aircraft routinely operating in the region (based on a background noise level of 35 dB). At a higher background noise level (50 dB), more typical of the environment and villages west of the Arctic Refuge, this distance can be reduced to

1 to 2.5 miles. The extent to which flights are routed from Fairbanks, or routed farther north between Deadhorse and Kaktovik, could significantly alter the location, number, and intensity of affected acres.

Because of the proximity of Kaktovik Airport to the community of Kaktovik, there is a potential for high, localized impacts on the acoustic environment of the community from future oil and gas exploration, development, and production; impacts would be commensurate with use of the airport. Takeoffs and landings at the airport are audible and dominant sounds in Kaktovik. The different action alternatives do not present a clear basis for differences in use of the airport, so use levels are estimated to be the same among them. These use levels could be up to ten times the current use levels if air traffic levels at the Deadhorse Airport are indicative of future air traffic levels at Kaktovik Airport. Although measures to manage aircraft type could influence the noise levels experienced by the community, even quieter aircraft dominate the soundscape at 1 mile under 35 dB background noise conditions.

Alternative B

There would be no direct noise impacts from leasing under Alternative B.

Under Alternative B, the entire program area could be offered for lease sale, and there would be the fewest acres with restrictions on activities. **Table 2-1** in **Chapter 2** identifies acres available for lease sale subject to NSO, TL, or only to STC. Three-D seismic surveys not associated with leases could result in short-term noise impacts throughout the entire federal Coastal Plain (1,563,500 acres). For smaller, operator-associated 3D surveys following the first lease sale, there would be no sources of sound from ground-based equipment in NSO areas (358,100 acres); however, there would be existing noise impacts in NSO areas resulting from noise sources located outside the NSO areas. Areas available for lease sale subject to TL or only STC would involve ground-based equipment that could increase ambient sound levels compared with Alternative A.

The BLM estimates that the entire federal Coastal Plain could be subject to 3D seismic surveys unrelated to leases (see **Appendix C**). After the first sale, operators would likely conduct smaller scale 3D surveys on their own lease blocks, assuming that seismic information would not already be available. Multiple vehicles could be used simultaneously and miles apart to conduct vibriosis exploration, or convoys of trucks could travel in a line, which is less common. Noise levels would likely be in the range of 48 to 53 dBA for individual trucks or 59.8 dBA for multiple trucks.

Seismic operations would include ski-mounted camp buildings towed by bulldozers or other tracked vehicles; the buildings would be moved weekly. Noise levels from these activities would likely be in the range of 52 to 61 dBA for individual bulldozers or tracked vehicles or 62 dBA for multiple pieces of equipment. These activities would occur only during the winter and would be short term, intermittent, and only in the areas around this equipment. Exploratory activities would include constructing ice roads and ice pads and performing exploratory drilling. Noise levels from construction would be in the range of 62 dBA. Ice road construction would proceed linearly, with noise impacts being temporary in the area being constructed. Traffic noise on ice roads would be as described above for seismic operations, while equipment, materials, and drill cuttings are being transported to or from the ice pads.

Median noise levels of drill rigs at 1,000 feet are estimated to be 52 dBA, and maximum noise levels are estimated to be 84.4 dBA. In a 35 dBA ambient sound level, representative of the program area, both would be high impact, dominant sounds. At a 50 dBA ambient sound level, representative of developed coastal areas, the median noise levels would be marginally audible, but maximum sound levels would still be dominant. Noise from drilling would occur over the weeks to months that it would take to drill each well and would

cease once the well is either completed or abandoned. As with seismic operations, exploratory activities would occur only in the winter.

Development would start following the discovery of an anchor field. Potential development would likely begin with the construction of a gravel pad for wells, CPF, airstrip, storage tanks, communications center, waste treatment unit, and a camp for workers. Noise sources during the development phase would include large-capacity dump trucks, bulldozers, and other heavy construction equipment. Average noise levels 1,000 feet from construction equipment for multiple pieces of construction equipment would be 62 dBA. Noise effects would be short term.

Development would include ice roads and vehicle travel along those roads for transporting materials, equipment, supplies, personnel, waste, and fuel. Gravel haul trucks would produce the greatest level of traffic noise, up to 110 dBA 50 feet from the noise source (USACE 2018); however, because gravel would most likely be sourced from areas surrounding the anchor and satellite pad sites (**Appendix C**), gravel hauling would be minimized. Other types of truck traffic would produce lesser noise levels, up to 81 dBA 50 feet from the noise source, or 55 dBA 1,000 feet from the noise source.

Gravel mining would result in noise levels of 62 dBA 1,000 feet from the source. Because this would be a similar noise level as other construction equipment, it would not be a dominant noise source in the development area. The exception to this is blasting, which can produce sound levels of 90 dBA at 1,000 feet from the source. Blasting would produce the highest discrete noise level during development but would occur only occasionally in the program area.

Impact equipment would be required for installing pipeline supports (VSMs). This equipment produces pulsed sound that can have a higher sound level and pressure than continuous sound. Sound levels generated by impact or impulse noise significantly exceed the background sound pressure level for a very short period. In-air noise levels at 50 feet from impact equipment can be 79 to 110 dBA (USACE 2018). Sound levels associated with pile driving and blasting are higher than other noise-producing activities; because of this, they could reach a larger area and be more disturbing than steady equipment noise and would be the dominant noise when they occur. Pile driving would occur for short durations.

As described for exploration, median noise levels of drill rigs at 1,000 feet are estimated to be 52 dBA, and maximum noise levels are estimated to be 84.4 dBA. In a 35 dBA ambient sound level, representative of the program area, both would be high impact, dominant sounds. At a 50 dBA ambient sound level, representative of developed coastal areas, the median noise levels would be marginally audible, but maximum sound levels would still be dominant. Assuming a diminishing rate of 6 dB per doubling of distance, sounds from onshore drilling 6 miles away would be below 24 dB at their median level. This median noise level would be inaudible in a 35 dB ambient sound level, but maximum noise levels would be audible and dominant from 6 miles away at that same ambient noise level. These impacts would be short term for each well drilled but would occur over a broad area.

The development of a STP and barge landing and storage pad would contribute to long-term, localized noise impacts in the marine environment. Noise would occur near barge loading and offloading operations. Similarly, underwater-radiated noise effects from commercial ships would occur at the anticipated frequency of two vessels per year on average for shipping modules for constructing the estimated four CPFs (see **Appendix C**). This would result in short-term noise impacts in the marine environment along the entire 1,600-nautical-mile marine barge route.

One or more of the CPF development clusters would likely be roadless, which would entail an expanded airstrip with the capacity to handle the larger cargo planes and increased air traffic. Noise resulting from fixed-wing aircraft is estimated to be 69 to 81 dB at a distance of 1,000 feet from the expanded airstrip. It would be audible 38 to 150 miles before noise levels diminish to the minimum ambient sound level in the analysis area, or the “natural quiet” condition; however, Alternative B would minimize the potential effects of low-flying aircraft on wildlife, subsistence activities, local communities, and recreationists in the area, including hunters and anglers, through ROP 34.

Operations would begin when a development is brought online. The predominant noise source would be from the CPFs. These facilities produce noise levels of 36 to 64 dBA at a distance of 1,000 feet. Noise would be audible up to 0.8 to 21 miles before levels diminish to the minimum ambient sound level in the analysis area, or the natural quiet condition. Flaring, if it is used, would produce a sound level of 71 dBA at a distance of 1,000 feet. Noise impacts from ground, barge, and aircraft traffic would be similar to those described under development.

Noise from abandonment and reclamation would be at levels comparable to general construction. This phase would involve plugging wells with cement, subsequently cutting and burying the well casing, removing gravel from pads and roads, and removing on-site equipment, facilities, and solid wastes. There would be short-term, temporary noises associated with this phase of fluid mineral development.

Alternative C

There would be no direct noise impacts from leasing under Alternative C.

Under Alternative C, the potential noise impacts from oil and gas development and production would be similar to Alternative B; however, they would occur in fewer areas as portions of the Coastal Plain would not be available for lease sale and a large portion of the remaining area would be subject to NSO. The BLM would apply more restrictive ROPs and lease stipulations under Alternative C that would reduce noise impacts in certain areas, as described below. **Table 2-1** in **Chapter 2** identifies acres not offered for lease sale and acres available for lease sale subject to NSO, CSU, or STC.

The potential noise impacts from future oil and gas exploration would be similar to Alternative B, however they would only occur in areas available for lease sale (1,037,200 acres). Three-D seismic surveys could result in short-term noise impacts similar to those described under Alternative B. There would be no sources of sound from ground-based seismic equipment in areas not offered for lease sale (526,300 acres) or NSO areas (708,200 acres).

The potential noise impacts from future oil and gas development and production would be similar to Alternative B; however, they would occur in a smaller area within the Coastal Plain. There would be no sources of sound from ground-based equipment in areas not offered for lease sale (526,300 acres) or areas with NSO stipulations (708,200 acres); however, noise impacts could occur in these areas from noise sources outside of these areas. The remaining acres available for lease sale subject to CSU (123,900 acres) or STC (205,100 acres) would experience sound from ground-based equipment that can increase ambient sound level, as described under Alternative B.

Lease Stipulation 10 would protect wilderness values (including impacts from noise) in the Mollie Beattie Wilderness Area by prohibiting surface occupancy, including exploratory and production well drill pads, structures and facilities, and gravel and ice roads, within 3 miles of the southern and eastern boundaries of the Coastal Plain where they are near designated wilderness.

Noise impacts in the marine environment along the entire 1,600-nautical-mile marine barge route would be slightly less, compared with Alternative B. This is because, under Alternative C, only two CPFs (one in the high potential area and one in the medium potential area south of Kaktovik) would need to be constructed (see **Appendix C**).

Under Alternative C, Lease Stipulation 9 would prohibit exploratory well drill pads, production well drill pads, or CPFs for oil or gas within 2 miles inland of the coast. This would serve to reduce noise impacts in this area; however, existing noise impacts would continue in this facility-free area from noise sources outside the 2-mile zone. Facilities along the coast, as well as offshore industry and sea vessels, would continue to produce noise that would be audible within this 2-mile facility-free area.

Noise from fixed-wing aircraft would be as described under Alternative B. To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary. As a result, fewer impacts from aircraft noise would be expected in that area. Alternative C would also minimize the potential effects of low-flying aircraft on wildlife, subsistence activities, local communities, and recreationists of the area, including hunters and anglers, through ROP 34.

Production-related noise would be similar to Alternative B but would occur in fewer areas, because only two CPFs would be developed instead of four.

Similar to Alternative B, noise from abandonment and reclamation would be at levels comparable to general construction.

Alternative D

There would be no direct noise impacts from leasing under Alternative D.

Under Alternative D, the potential noise impacts from oil and gas development and production would be similar to Alternative B; however, they would occur in fewer areas as nearly half of the Coastal Plain would not be available for lease sale and a large portion of the remaining area would be subject to NSO. Alternative D also incorporates stricter stipulations and ROPs. **Table 2-1 in Chapter 2** identifies acres not offered for lease sale and acres available for lease sale subject to NSO, CSU, TL, or STC.

The potential noise impacts from future oil and gas exploration would be similar to Alternative B in areas available for lease sale. Three-D seismic surveys could result in short-term noise impacts only in areas available for lease sale; the nature and type of impacts would be similar to those described under Alternative B. There would be no sources of sound from ground-based seismic equipment in areas not offered for lease sale (797,700 acres) or NSO areas (726,300 acres).

The potential noise impacts from future oil and gas development and production would be similar to Alternative B; however, they would occur in a smaller area within the Coastal Plain. There would be no sources of sound from ground-based equipment in areas not offered for lease sale (797,700 acres) or areas with NSO stipulations (726,300 acres); however, noise impacts could occur in these areas from noise sources outside of these areas. The remaining acres available for lease sale subject to CSU (15,900 acres), TL (1,800 acres), or only STC (21,800 acres) would experience sound from ground-based equipment that can increase ambient sound level, as described under Alternative B; however, this would not occur during certain times of the year for acres available for lease sale subject to TL.

Lease Stipulation 10 would protect wilderness values (including impacts from noise) in the Mollie Beattie Wilderness Area by making areas north of the wilderness area unavailable to leasing and by prohibiting

surface occupancy, including exploratory and production well drill pads, structures and facilities, and gravel and ice roads, within 3 miles of the southern and eastern boundaries of the Coastal Plain where they are near designated wilderness.

Short-term noise impacts in the marine environment along the entire 1,600-nautical-mile marine barge route would be reduced, compared with Alternative B. This is because shipments would be required for the construction of only one CPF (see **Appendix C**).

Noise from fixed-wing aircraft would be as described under Alternative B. To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary. As a result, fewer impacts from aircraft noise, as described under Alternative B, would be expected in that area. Alternative D would also minimize the potential effects of low-flying aircraft on wildlife, subsistence activities, local communities, and recreationists in the area, including hunters and anglers, through ROP 34. Under Alternative D, aircraft-related noise impacts would be avoided in more portions of the program area under certain times of the year to protect wildlife and subsistence uses. This would serve to reduce noise impacts in these areas but may serve to concentrated noise impacts in other areas.

Production-related noise would be similar to that under Alternative B, but it would occur in fewer areas, as one CPF would be developed instead of the four proposed under Alternative B.

Similar to Alternative B, noise from abandonment and reclamation would be at levels comparable to general construction.

Alternative D2

There would be no direct noise impacts from leasing under Alternative D2. Under Alternative D2, the potential noise impacts from on-the-ground oil and gas development and production would be similar to Alternative D; however, they would occur in fewer areas as nearly three quarters of the Coastal Plain would not be available for lease sale (1,163,500 acres) and a large portion of the remaining area would be subject to NSO (231,700 acres). Alternative D2 also incorporates stricter stipulations and ROPs than Alternatives B and C. **Table 2-1** in **Chapter 2** identifies acres not offered for lease sale and acres available for lease sale subject to NSO, CSU, TL, or STC.

The potential noise impacts from future on-the-ground oil and gas exploration would be similar to Alternative D, particularly in areas available for lease sale. Three-D seismic surveys could result in short-term noise impacts in areas available for lease sale; the nature and type of impacts would be similar to those described under Alternative D. There would be no sources of sound from ground-based seismic equipment in areas not offered for lease sale (1,163,500 acres) or NSO areas (231,700 acres).

While there would be no sources of sound from ground-based equipment in areas not offered for lease sale or areas with NSO stipulations; noise impacts could occur from sources outside of these areas. The remaining acres available for lease sale subject to CSU (84,300 acres), TL (3,100 acres), or only STC (80,900 acres) would experience sound from ground-based equipment that can increase ambient sound level, as described under Alternative D; however, this would not occur during certain times of the year for acres available for lease sale subject to TL.

Under Alternative D2, Lease Stipulations 1, 2, 4, 5, 9, and 10 would have the same requirements as Alternative D, with added exceptions to the requirements. For example, exceptions for some activities would be considered on a case-by-case basis and would require coordination between the BLM Authorized Officer and

the USFWS. Lease Stipulation 1 may permit an exception for setback distances in situations where the Authorized Officer can demonstrate compliance with the outlined conditions (See **Table 2-3** in **Chapter 2**). In NSO areas, a one-time exception may be granted for Lease Stipulations 1, 2, 4, 5, 9, and 10 if there are no practical alternatives to accessing subsurface resources, the proposed action maintains resource functions, and the proposed action complies with other applicable laws. Under Lease Stipulation 4, infrastructure necessary for oil and gas development in critical and sensitive habitats may be approved on a case-by-case basis, in consultation with relevant agencies and stakeholders. These exceptions would potentially contribute to increased, localized noise levels; however, impacts would be negligible, compared to the other alternatives, because a greater percent of the program area would not be available for lease sale under alternative D2.

Lease Stipulations 5 introduces a no leasing exception that would restrict leasing from the coast to 1-mile inland along the coastline of the critical denning habitat in the northwest portion of the Coastal Plain near the Canning/Staines Rivers and in the Camden Bay area, reducing of the potential for noise within the described area.

Additionally, under Alternative D2, Lease Stipulations 1, 2, 3, 4, 6 would have the same requirements as Alternative D, and incorporate language about minimizing disruption to polar bear denning habitat. Lease Stipulations 5 and 9 would include additional TL requirements restricting oil and gas activities, such as drilling, seismic exploration, and testing from specific areas and during certain times of the year (See **Table 2-3** in **Chapter 2**). Lease Stipulation 9 would also restrict permanent oil and gas infrastructure from the coastline to 2 miles inland. Lease Stipulation 12 would have a different requirement than under Alternative D, requiring all infrastructure, including oil and gas facilities, wells, pipelines, and gravel roads and pads be designed and constructed to accommodate the thaw subsidence anticipated over the design life in areas of ice-rich soils and yedoma deposits. These additional requirements would collectively reduce noise produced in the program area, preserving the natural acoustic environment especially within areas subject to TL.

Transboundary Impacts

Transboundary impacts related to noise levels with anticipated direct and indirect effects on resources are discussed in the respective resource sections. Noise levels associated with each phase of oil and gas development, discussed above for each alternative, may have the potential for transboundary effects on particular resources. Given that at its closest point Canada is approximately 30 miles from the Coastal Plain, and that transportation routes are anticipated to approach Coastal Plain operations from the west and south, noise generated from oil and gas operations in the Coastal Plain generally would not be capable of being heard in Canada.

Cumulative Impacts

Past activities have increased ambient sound levels on the North Slope, including those resulting from development in the NPR-A, development on state lands on the Prudhoe Bay Oil Field, offshore drilling activities, and surface, air, and marine transportation related to this development. Present and future oil and gas development on the North Slope could result in cumulative impacts on the acoustic environment from exploration and operations related to air traffic levels in the region. However, impacts would be localized as the North Slope's reach extends at least 5 miles from any standard connection route and acoustic impacts only extend 25 miles from the standard connection center line. Further, present, and future noise generated from offshore oil and gas development could cause disturbances to wildlife, having cumulative impacts on the acoustic marine environment.

Increased tourism and infrastructure developments as well as the maintenance of seasonal roads, trails, and other communication projects in nearby communities would all have cumulative impacts on the acoustic environment as a result of increased air travel. The operation of Rolligons, all-terrain arctic vehicles, and other vehicles would also have cumulative impacts on the acoustic environment. The action alternatives would contribute a similar potential for noise from oil and gas exploration and from development and transportation. Oil and gas exploration, development, and production in the western Canadian Arctic also contribute to cumulative noise impacts. These planned activities include the development of a gas treatment plant at Prudhoe Bay. As areas in and around Prudhoe Bay continue to be developed, projected levels of air traffic have the greatest potential for contributing to cumulative impacts by increasing the number of flights over an area per day. The potential cumulative impacts on the acoustic environment would affect the community of Kaktovik and individuals throughout the program area, as well as noise-sensitive resources along aircraft flight paths outside of the program area. The direct and indirect impacts under all action alternatives would add to these cumulative impacts on noise in the program area from increased air traffic, seismic activities, and the expansion of ground-based equipment. The contribution to cumulative impacts would be greatest under Alternative B and least under Alternative D.

3.2.4 Physiography

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on physiography from on-the-ground activities.

The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, current management actions would be maintained as described in the Arctic Refuge Revised CCP (USFWS 2015a). No potential impacts on physiographic features from future oil and gas exploration, development, and production would occur.

Impacts Common to All Action Alternatives

Future construction of infrastructure would affect topography in the program area and could reshape geomorphological features, such as water bodies and permafrost features (see **Section 3.2.8**, Soil Resources and **Section 3.2.10**, Water Resources).

All the action alternatives would require placement of gravel fill, which would have the potential direct impact of altering the topography within the site-specific development footprint. Gravel infrastructure would include pads, roads, and airstrips, as described in **Appendix C**. This potential long-term impact would begin during the construction phase and would last throughout the development phase until the gravel is removed and the site has been restored to pre-program conditions. ROP 35 would require an abandonment and reclamation

plan that describes measures to ensure eventual ecosystem restoration to the land's previous hydrological, vegetation, and habitat condition; however, exceptions may be granted. Impacts would last longer if not all gravel infrastructure, such as access roads, are removed. Furthermore, if the site cannot be restored to pre-program conditions, for example, if a depression remains, then impacts from gravel fill placement could be permanent.

In addition to the potential direct effects on topography that would result from placement of gravel fill, the presence of gravel infrastructure would alter existing geomorphic features. For example, the sea barge landing and staging structures would affect the pattern of sediment erosion and deposition, which could result in local, long-term changes to the coastline configuration. Likewise, if the gravel pad for the STP is placed in water rather than on land, similar effects on physiography would occur. This impact would last throughout the development phase and for some period after the structure is removed during reclamation. Other gravel infrastructure could affect permafrost features or result in changes to stream or lake morphology. Potential direct and indirect impacts on permafrost features are further described in **Section 3.2.8**. Potential direct and indirect impacts on surface water features are further described in **Section 3.2.10**.

All action alternatives assume different estimations of surface development area from future oil and gas development and production. Under all action alternatives most, but not all, of the surface development is associated with gravel extraction and placement of gravel fill. The size of the STP would be an estimated 15 acres under all action alternatives. For the sea barge landing, each action alternative assumes a 10-acre gravel area, including a pad for staging modular units. The footprint of other gravel infrastructure would vary, depending on the alternative (see discussion of each alternative below).

All the action alternatives would include potential future development of a gravel mine or mines, which would also result in potential direct long-term impacts on topography. The surface area of the gravel mines would total approximately 280 to 300 acres for each action alternative. The acreage required for gravel mining could increase or decrease, depending on local conditions. Impacts of gravel mining on physiography would last beyond the development phase because the pits remaining from gravel extraction would typically not be completely backfilled, and any remaining depression could fill with water and become a permanent lake. ROP 30 would reduce potential impacts of mining on river bluffs and cliffs by limiting the volume that could be removed from cliffs and prohibiting extraction that could affect the integrity of river bluffs. Gravel mines are described further in **Section 3.2.9**, Sand and Gravel Resources.

Future ice infrastructure (e.g., pads and roads), used primarily during the exploration and development phases, would have negligible impacts on topography but could affect permafrost and surface water geomorphic features, as discussed further in **Section 3.2.8** and **Section 3.2.10**. Additionally, vehicle tracks from 3D-seismic surveys during the exploration phase can directly affect microtopography and lead to permafrost thaw and settlement (Walker et al. 2019). Such impacts could be long term or permanent. These impacts are further described in **Section 3.2.8**.

Potential changes to physiography associated with geologic hazards (e.g., subsidence or slope failure) are addressed in **Section 3.2.5**.

Alternative B

Approximate acreages associated with future gravel infrastructure specific to Alternative B are as follows:

- 168 acres for 14 satellite drill pads
- 200 acres for four CPFs
- 1,305 acres for 172 miles of gravel roads

Alternative C

Approximate acreages associated with future gravel infrastructure for Alternative C would include:

- 108 acres for 9 satellite drill pads
- 100 acres for two CPFs
- 1,005 acres for 134 miles of gravel roads
- Under Alternative C, ROP 35 contains a provision requiring that reclamation include “reshaping the area disturbed...where reasonably practicable.” This ROP would help to minimize permanent impacts on topography.

Alternative D

Approximate acreages associated with future gravel infrastructure for Alternative D would include:

- 72 acres for 6 satellite drill pads
- 50 acres for one CPF
- 735 acres for 98 miles of gravel roads

Under Alternative D, ROP 35 would require reclamation to reshape disturbed areas when activities are complete. Reshaping these areas would help ensure the contours are maintained and not impacted by erosion.

Alternative D2

Approximate acreages associated with future gravel infrastructure for Alternative D2 would include:

- 36 acres for 3 satellite drill pads
- 50 acres for one CPF
- 735 acres for 98 miles of gravel roads

Under Alternative D2, ROP 35 would require reclamation to reshape disturbed areas when activities are complete. Reshaping these areas would help ensure the contours are maintained and not impacted by erosion.

Transboundary Impacts

Transboundary impacts associated with physiography have not been identified for any of the alternatives.

Cumulative Impacts

Potential impacts on topography and geomorphic features resulting from future gravel infrastructure are generally localized to the footprint or adjacent area; therefore, the geographic area relevant for assessing cumulative impacts on physiography is the program area. Other past, present, and reasonably foreseeable future actions on the North Slope (**Appendix G**) have had or would have impacts on physiography; however, with the exception of the Arctic Strategic Transportation and Resources (ASTAR) program, none of these actions have been or are proposed to be in the program area and so would not contribute to cumulative impacts on physiographic features in the Coastal Plain. At locations where seismic surveys overlap the footprint of future oil and gas development, cumulative effects on permafrost features could result. These impacts are

described more fully in **Section 3.2.8**. Gravel roads could be constructed in the Coastal Plain as part of the ASTAR program. Impacts on topography from these roads would be cumulative and would be similar to the impacts described above for the proposed project. A proposed ROW for a snow trail within the program area could contribute to cumulative impacts when considered with other ice or snow roads; however, these impacts would likely be avoided or minimized via design features applied to the ROW by the USFWS. The effects of climate change described under Affected Environment (**Appendix B**), could influence the rate or degree of the potential cumulative impacts. Alternative A would not contribute to cumulative impacts on physiography as there are no direct or indirect impacts under that alternative.

3.2.5 Geology and Minerals

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on geology and minerals from on-the-ground activities.

The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, current management actions would be maintained as described in the Arctic Refuge CCP (USFWS 2015a). Consistent with ANILCA, the Coastal Plain would remain closed to all forms of appropriation under the public land laws, including the mineral leasing and mining laws. No potential impacts on geology or mineral resources from future oil and gas exploration, development, and production would occur.

Impacts Common to All Action Alternatives

None of the action alternatives would affect mineral resources in the program area, with the exception of petroleum and aggregate resources, which are addressed in **Sections 3.2.6** and **3.2.9**, respectively.

Potential impacts on geologic resources would be site specific. As described above, bedrock is minimally exposed across much of the Coastal Plain; therefore, existing bedrock outcrops are highly valuable in developing the best possible surface and subsurface geologic understanding of the area. There are a number of relatively small, low-relief, but critically important bedrock outcrops exposed along the Niguanak and Jago Rivers and their tributaries in the northeastern part of the program area (specifically in the area ranging from Townships 6-8 North and Ranges 35-37 East). These exposures are reported to include strata of the Kingak shale, pebble shale unit, Hue shale, and Canning Formation (Marshall et al. 1998). The structural, stratigraphic, and source rock implications of these strata remain enigmatic and warrant further geologic study.

Important culturally significant bedrock exposures also occur along the Marsh Creek anticline in the western part of the program area. If outcrops are covered by gravel or modified by blasting for gravel extraction, the localized bedrock would no longer be available for analysis. Potential impacts would be long term and would last until the gravel is removed, up to 85 years.

Land within 1 mile of the Jago River and 0.5 mile of the Tamayariak River, Katakaturuk River, and Marsh Creek would be subject to the NSO limitations (i.e., only essential pipeline and road crossings permitted) under all action alternatives. This would provide some protection for the outcrops in these areas. Seismic surveys would not affect bedrock outcrops. No other potential direct or indirect impacts on geology have been identified. Abandonment and reclamation (described in **Appendix B**) would not affect geologic resources.

Oil and gas exploration, development, and production could also affect the risk of several geologic hazards identified in the *Affected Environment* (**Appendix B**), including seismicity, slope failure, subsidence, flooding, and river ice jams.

Future development of petroleum resources would include injection of seawater or gas into the production field to maintain reservoir pressure. Also, wastewater, produced water, spent fluids, and chemicals would be disposed of in injection wells. Injection of large volumes of fluids into low permeability and brittle rocks has potential to trigger low level seismicity (earthquakes). This phenomenon is generally associated with the high volumes of waste injection associated with the high density of wells needed to fully develop tight unconventional resource plays, such as shale source rocks, rather than conventional hydrocarbon production. The potential for induced seismicity associated with the action alternatives would be low.

Slope failure could be triggered or worsened by placement of gravel fill in the future; however, horizontal and extended-reach drilling technology allows flexibility in placing drill sites, so they can be sited in locations that are not prone to slope failure. Roads and pipelines would be designed and constructed using methods that would avoid or minimize potential slope failure along stream banks and other areas of steep slopes. Geotechnical evaluations would typically be conducted for oil and gas development projects on a project-specific basis, as needed, to mitigate the risk of slope failure. Therefore, the potential for leasing and development to influence slope failure risk would be low. Likewise, slope failure is unlikely to affect infrastructure associated with oil and gas exploration, development, and production.

Subsidence associated with thawing permafrost could adversely affect oil and gas infrastructure. To minimize the potential for subsidence associated with thawing of near surface ice, gravel pads and roads would be constructed with a thickness sufficient to maintain a stable thermal regime (see **Chapter 2**). Future pipelines would be constructed primarily aboveground and would not contribute to permafrost thaw. All future buildings would be designed to prevent permafrost thaw or supported aboveground on pilings to accommodate ground settling or frost heaving.

Warm production and injection wells can cause thawed areas around the well. In 2017, an oil production well within the original Prudhoe Bay field on the North Slope suffered a cracked casing due to subsidence from thawing, which resulted in an oil spill. The well's construction geometry contributed to the failure (AOGCC 2017). This type of failure is minimized by modern well construction methods, including installing thermosyphons around wells to remove heat transfer from wellbore fluids.

Under all action alternatives, the risk of flooding and river ice jams would be mitigated by ROP 22, which states, "the design engineer would ensure that crossing structures are designed for aufeis, permafrost, sheet flow, additional freeboard during breakup, and other unique conditions of the arctic environment."

Disturbance caused by removing gravel fill during abandonment and reclamation could increase the potential for slope failure in areas of steep slopes. Measures to restore vegetation and hydrologic conditions, described in ROP 35, also would serve to stabilize slopes under all action alternatives.

Alternative B

Potential impacts on geology and minerals from future oil and gas exploration, development, and production under Alternative B would be the same as identified above for all action alternatives.

ROP 30 lists the following measures that would help to mitigate impacts at cliff and bluff locations:

- Removing greater than 100 cubic yards of bedrock outcrops, sand, or gravel from cliffs would be prohibited.
- Any extraction of sand or gravel from an active river or stream channel would be prohibited, unless it is preceded by a hydrological study that indicates no potential impact on the integrity of the river bluffs.

Alternative C

Potential impacts on geology and minerals from future oil and gas exploration, development, and production under Alternative C would be the same as identified above for Alternative B, except for an additional NSO limitation that would provide some protection for critically important outcrops (Lease Stipulation 1).

As indicated above, for all action alternatives ROP 35 stipulates developing and implementing an abandonment and reclamation plan to restore previous conditions. However, under Alternative C, ROP 35 includes the following additional reclamation plan requirements that would minimize the risk of slope failure:

- Implementing measures to control erosion, landslides, and water runoff
- Reshaping the area disturbed, applying the topsoil, and revegetating disturbed areas, where reasonably practicable

Alternative D

Potential impacts on geology and minerals from future oil and gas exploration, development, and production under Alternative D would be the same as described above for all action alternatives, except for an additional NSO limitation that would provide some protection for critically important outcrops.

As indicated above, for all action alternatives ROP 35 stipulations require developing and implementing an abandonment and reclamation plan to restore previous conditions. Under Alternative D, ROP 35 includes the same additional reclamation plan requirements as Alternative D, which would minimize the risk of slope failure.

Alternative D2

Potential impacts on geology and minerals from future oil and gas exploration, development, and production under Alternative D2 would be the same as described above for all action alternatives, except for an additional NSO limitation that would provide some protection for critically important outcrops.

As indicated above, for all action alternatives ROP 35 stipulations require developing and implementing an abandonment and reclamation plan to restore previous conditions. Under Alternative D2, ROP 35 includes the same additional reclamation plan requirements as Alternatives C and D, which would minimize the risk of slope failure.

Transboundary Impacts

Impacts on the geologic and mineral resources described in this section are site specific and, as such, no transboundary impacts would occur under any of the alternatives.

Cumulative Impacts

The geographic area relevant for assessing cumulative impacts for geology and minerals is the program area. No other past, present, and reasonably foreseeable future actions that could affect geology or mineral resources have occurred or are expected to occur in the program area. The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate or degree of potential geologic hazards. Alternative A would have no contribution to cumulative impacts on geology and minerals.

3.2.6 Petroleum Resources

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on petroleum resources from on-the-ground activities.

Alternative A

Under Alternative A, no federal minerals in the Coastal Plain would be offered for future oil and gas lease sales. Alternative A would not establish and administer a competitive oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain in the Arctic Refuge. Current management actions would be maintained, and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). No future extraction or use of petroleum resources would occur and as a result no potential direct or indirect impacts on petroleum resources from future oil and gas exploration, development, and production would occur.

Impacts Common to All Action Alternatives

Potential future impacts on petroleum resources under all action alternatives can reasonably be expected to result in the irreversible commitment of petroleum hydrocarbon resources of the PL 115-97 through future oil and gas exploration, development, and production; however, the stated purpose of this EIS is to facilitate petroleum leasing, resulting in development, and production.

Potential impacts on petroleum resources would vary based on the amount of acreage available for leasing and restrictions on access to surface to locate required equipment and infrastructure, including CPFs, well pads, roads, barge and storage pads, and gravel supply sites. Under all action alternatives a limit on total surface disturbance within the program area would be applied, after the limit is reached no further disturbance would be permitted and all activities in the program area would need to take place on existing disturbance. The approach for allocating limited acres of allowable production and support infrastructure and facilities would be generally described in the detailed statement of sale accompanying the notice of sale for the lease sale.

Mean estimates for the program area suggest it contains approximately 7.687 billion barrels of technically recoverable oil and 7.04 TCF of technically recoverable natural gas (Attanasi 2005). Due to high costs associated with operating in the Arctic it is extremely unlikely that all technically recoverable resources would be produced. The US Energy Information Administration estimated that a total of approximately 3.4 BBO

could be produced in the Arctic Refuge by 2050, based on expected oil prices at the time (Van Wagner 2018). Oil would be transported to market by a connection to the TAPS. Neither of these studies considered the potential impacts of constraints such as stipulations or limitations to areas offered for leasing on oil production.

Given the limited amount of information regarding petroleum resources in the program area, the locations, size, number, and characteristics of any economically viable accumulations of oil are unknown. The rate and total amount of production is highly dependent of these factors, as a result attempting to define variances in production by alternative is too speculative to provide value in this analysis. There are a variety of differences between the alternatives that could impact the rate and amount of production. NSO restrictions could require that well pads be located outside optimal locations for the most efficient oil recovery under some alternatives; however, current horizontal drilling technology would allow operators to recover oil and gas from NSO areas that are within up to six miles of an area where a well pad could be located. Under some alternatives, additional pads could be required to fully access areas with a NSO stipulation, potentially resulting in increased costs and decreasing the overall volume of oil and gas that would be economically recoverable.

Until the locations of oil accumulations targeted for development are known, it is impossible to determine exactly what impact an NSO stipulation might have on development; however, a large contiguous NSO area could prevent the development of a petroleum accumulation located underneath. CSU and TL stipulations would not prevent developing the area but could result in additional costs associated with meeting CSU requirements or compressing activities into shorter timelines within TL requirements. Limits on the amount of total surface disturbance would limit the amount of infrastructure that could be located in the program area, which would ultimately limit the number of producing wells which would constrain production. Operators could locate some infrastructure on lands outside of the program area to keep it from counting against the disturbance limit, and wells could be drilled horizontally into some parts of the program area from well pads located on Native or state lands outside of the program area. However, a large part of the program area can only be accessed from surface development inside its boundary. Depending on the number and size of future developments, surface disturbance limits could restrict total development and production.

A natural gas transport pipeline from the North Slope to southcentral Alaska is currently planned, transported gas would primarily be transformed into liquefied natural gas and transported by ship markets outside of Alaska. Gas transported through the pipeline is expected to initially come from established fields with proven reserves located outside the program area. If proven gas resources are discovered in the Coastal Plain, they could eventually be connected to the pipeline to maintain pipeline capacity as the primary fields are depleted. However, given the size of the recoverable gas reserves in the Prudhoe Bay field and elsewhere on the North Slope, it is assumed that any connection of the Coastal Plain to infrastructure for transportation of natural gas to market would occur beyond the lifetime of this analysis. Estimated total natural gas production from the Coastal Plain ranges from 0 to 7 TCF of gas produced (Attanasi 2005). Any co-occurring gas produced with oil before a gas pipeline is available would be reinjected to maintain reservoir pressure, co-occurring natural gas liquids could be separated to blend in and transport with the oil (**Appendix C**). Flaring of gas would be limited to the minimum necessary to safely operate processing facilities. Production wells would be fractured to stimulate production, but no hydraulic fracturing to produce unconventional resources is anticipated (**Appendix C**). There is no unconventional oil and gas production on Alaska's North Slope (BLM 2012) due to high development and production costs in the Arctic. The viability of hydraulic fracturing of unconventional petroleum resources has not been proven in the Arctic from a technology or commercial viability standpoint.

Under all action alternatives potential future spills and leakage of petroleum resources would result in a loss of productive use of spilled resources. The potential occurrence of spills does not depend on any alternative

chosen, as spills are not a planned activity and are unpredictable in cause, location, size, time, duration, and material type (Mach et al. 2000). See **Section 3.2.11**, Solid and Hazardous Waste, for more information regarding spills. Under all action alternatives operators would be required to prepare and implement spill prevention and control plans in compliance with applicable federal and state regulations.

Alternative B

Table 3-16 shows acreages that would be subject to NSO stipulations, TLs, or would be open to leasing under STC. No areas of CSU stipulations would be applied under this alternative. Under Alternative B, a total estimated surface disturbance of 2,000 acres would occur in the program area, after which no additional surface disturbance would be permitted. This alternative would open the entire 1,563,500 acres of the Coastal Plain to leasing, allowing the greatest acreage for leasing and potential petroleum extraction (see **Map 3-6**, Hydrocarbon Potential, Alternative B, in **Appendix A** for more detail). Given that most of the program area is open to leasing with STC or with only TL stipulations, fewer limitations on the locations of future CPFs and drill pads exist under this alternative.

Table 3-16
Lease Stipulation Acreages for Alternative B

Lease Stipulations	Low Oil Potential (acres)	Medium Oil Potential (acres)	High Oil Potential (acres)	Total (acres)
NSO	96,300	120,500	141,200	358,100
Standard Terms and Conditions Only	45,600	287,900	286,500	620,000
TL	335,300	250,100	0	585,400
Total	477,200	658,500	427,700	1,563,500

Source: BLM and USFWS GIS 2022

Under this alternative it is expected that up to 600 wells, and associated surface infrastructure could be located in the program area under the 2,000-acre surface disturbance estimate, over the life of a development program in the Coastal Plain. Under this alternative, the RFD estimates that approximately 1.9 BBO could ultimately be produced from the program area.

Under Alternative B seismic exploration would be allowed across the entire program area, this would allow for high resolution three dimensional seismic surveys to delineate resources in lease areas as well as area wide seismic surveys that could improve regional knowledge of petroleum resource conditions or result in the discovery of oil accumulations outside of areas current information considers them likely to occur.

Alternative C

Table 3-17 shows acreages that would be subject to NSO, or CSU stipulations that would be open to leasing under STC, or that would not be offered for lease. No areas of TL stipulations would be applied under this alternative. A total of 1,037,200 acres would be available for leasing. Under this alternative, a total estimated surface development of 1,464 acres would occur.

The 526,300 acres that are not offered for leasing represent approximately 34 percent of the program area. The area closed to leasing is in low and moderate petroleum potential sections of the program area projected to have small accumulations of petroleum; thus, the percentage of petroleum resources closed to leasing would be less than 34 percent of the economically recoverable petroleum resources. See **Map 3-7**, Hydrocarbon Potential, Alternative C, in **Appendix A**.

Table 3-17
Lease Stipulation Acreages for Alternative C

Lease Stipulations	Low Oil Potential (acres)	Medium Oil Potential (acres)	High Oil Potential (acres)	Total (acres)
CSU	11,000	80,500	32,400	123,900
Not offered for lease	398,300	120,600	7,300	526,300
NSO	67,900	384,500	255,800	708,200
Standard Terms and Conditions Only	0	72,900	132,200	205,100
Total	477,200	658,500	427,700	1,563,500

Source: BLM and USFWS GIS 2022

Under this alternative, only 19 percent of the medium and high potential areas would be available for leasing with STC. Approximately 45 percent of the program area is subject to NSO stipulations, which could limit the location of future CPFs and drill pads, potentially resulting in changes to pad configurations and reduced oil production. NSO restrictions are in portions of the high, medium, and low development potential areas.

With the anticipated 1,464 acres of surface disturbance, and limitations due to lease stipulations, it is expected that up to 456 wells, and associated surface infrastructure could be located within the program area under this alternative, over the life of a development program in the Coastal Plain. Under this alternative, the RFD estimates that approximately 1.4 BBO could ultimately be produced from the program area.

Under Alternative C, seismic exploration would be limited to areas available for lease sale. This would allow for high resolution 3D seismic surveys to delineate resources in these areas but would prevent new program area-wide seismic surveys that could improve regional knowledge of petroleum resource conditions or result in the discovery of previously unknown oil accumulations outside of areas available for lease sale.

Alternative D

Table 3-18 shows acreages that would be subject to NSO, CSU, or TL stipulations that would be open to leasing under STC, or that would not be offered for lease. Approximately 21,800 acres would be open to leasing under STC, and a total of 765,800 acres would be available for leasing. Under Alternative D, there would be an estimated 1,040 acres of surface disturbance from development activities.

Table 3-18
Lease Stipulation Acreages for Alternative D

Lease Stipulations	Low Oil Potential (acres)	Medium Oil Potential (acres)	High Oil Potential (acres)	Total (acres)
Not offered for lease	477,200	287,300	32,800	797,700
NSO	0	336,000	390,400	726,300
CSU	0	14,600	1,300	15,900
TL	0	1,700	100	1,800
Standard Terms and Conditions Only	0	18,900	3,200	21,800
Total	477,200	658,500	427,700	1,563,500

Source: BLM and USFWS GIS 2022, Acres may vary slightly due to rounding.

Under Alternative D, approximately 46 percent of the program area would be subject to NSO stipulations and 51 percent of the program area would not be available for lease (**Map 3-8**, Hydrocarbon Potential, Alternative D, in **Appendix A**). This would limit the location of future CPFs, drill pads, and other infrastructure. Potentially, these limitations could result in changes to pad configurations and reduce oil production, or even prevent development, if no economically viable oil accumulations were discovered in proximity to locations where CPFs and drill pads could be located. Also, Alternative D could result in oil production and support

infrastructure located on Native lands or other lands located outside of the program area to avoid development restrictions and reduce surface disturbance within the program area.

With the estimated 1,040 acres of surface disturbance, and limitations due to lease stipulations and areas not offered for lease, it is expected that up to 168 wells, and associated surface infrastructure, could be located within the program area under Alternative D. This would be over the life of a development program in the Coastal Plain. Under this alternative, the RFD estimates that approximately 0.5 BBO could ultimately be produced from the program area.

Under Alternative D, seismic exploration would be limited to areas available for lease sale. This would allow for high resolution 3D seismic surveys to delineate resources in these areas, but it would prevent new program area-wide seismic surveys that could improve regional knowledge of petroleum resource conditions or result in the discovery of previously unknown oil accumulations outside of areas available for lease sale.

Alternative D2

Table 3-19 shows acreages that would be subject to NSO, CSU, or TL stipulations that would be open to leasing under STC, or that would not be offered for lease. Approximately 80,900 acres would be open to leasing under STC, and a total of 400,000 acres would be available for leasing. Under Alternative D2, there would be an estimated 995 acres of surface disturbance from development activities.

Table 3-19
Lease Stipulation Acreages for Alternative D2

Lease Stipulations	Low Oil Potential (acres)	Medium Oil Potential (acres)	High Oil Potential (acres)	Total (acres)
Not offered for lease	477,200	658,500	27,700	1,163,400
NSO	0	0	231,700	231,700
CSU	0	0	84,300	84,300
TL	0	0	3,100	3,100
Standard Terms and Conditions Only	0	0	80,900	80,900
Total	477,200	658,500	427,700	1,563,400

Source: BLM and USFWS GIS 2022, Acres may vary slightly due to rounding.

Under Alternative D2, approximately 15 percent of the program area would be subject to NSO stipulations and 74 percent of the program area would not be available for lease (Map 3-9, Hydrocarbon Potential, Alternative D2, in **Appendix A**). This would limit the location of future CPFs, drill pads, and other infrastructure. Potentially, these limitations could result in changes to pad configurations and reduce oil production, or even prevent development, if no economically viable oil accumulations were discovered in proximity to locations where CPFs and drill pads could be located. Also, Alternative D2 could result in oil production and support infrastructure located on Native lands or other lands located outside of the program area to avoid development restrictions and reduce surface disturbance within the program area.

With the estimated 995 acres of surface disturbance, and limitations due to lease stipulations and areas not offered for lease, it is expected that up to 120 wells, and associated surface infrastructure, could be located within the program area under Alternative D2 over the life of a development program in the Coastal Plain. Under this alternative, the RFD estimates that approximately 0.4 BBO could ultimately be produced from the program area.

Under Alternative D2, seismic exploration would be limited to areas available for lease sale. This would allow for high resolution 3D seismic surveys to delineate resources in these areas. However, it would prevent new

program area-wide seismic surveys that could improve regional knowledge of petroleum resource conditions or result in the discovery of previously unknown oil accumulations outside of areas available for lease sale.

Transboundary Impacts

No transboundary impacts on petroleum resources are anticipated due to the implementation of the proposed leasing program. Development of oil and gas pools that extend beyond the Coastal Plain boundary could affect petroleum resources outside the boundary. In this case, unitization agreements would be developed between the mineral owners and lessees of the pool.

Cumulative Impacts

Oil and gas exploration, development, and production around the North Slope have resulted in and would continue to result in irreversible commitment of oil resources. The completion of a natural gas transportation pipeline, either the Alaska Liquid Natural Gas Project pipeline or the Alaska Stand Alone Gas Pipeline, could result in the irreversible commitment of natural gas resources. Scientific information gained by exploration programs could result in a better understanding of the type and size of petroleum resources in the program area. Spills of produced petroleum products associated with oil and gas exploration and development would result in an irreversible loss of those resources. Under Alternative A no leasing would occur; this would preclude the possibility of developing petroleum resources in the Coastal Plain and would not contribute to cumulative impacts on petroleum resources. The production and subsequent consumption of petroleum resources would contribute to climate change, which are discussed in **Section 3.2.1**. Many potential impacts of climate change, such as changes in precipitation, increases in extreme weather events, increased temperatures, or temperature variability, changes to permafrost stability, and a shorter operational season, could result in increased costs and operational difficulties for the exploration, development, and production of petroleum resources on the North Slope.

3.2.7 Paleontological Resources

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on paleontological resources from on-the-ground activities.

The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, current management actions would continue as described in the Arctic Refuge CCP (USFWS 2015a). Changes to paleontological resources, such as increased exposure due to changes in permafrost, riverbank erosion, coastal erosion, and weathering, would continue to occur along current trends. There would be no potential direct or indirect impacts on paleontological resources from future oil and gas exploration, development, and production under Alternative A.

Impacts Common to All Action Alternatives

The limited bedrock outcrops and distribution of surficial quaternary deposits are the only sources for understanding the distribution and type of paleontological resources in the program area. As described in **Section 3.2.5**, if future program-related infrastructure includes gravel fill, the ability to evaluate and observe paleontological resources would be restricted; however, placement of gravel fill would also provide erosion protection, which may support preservation of the resource. Potential impacts would be long term and would last until the gravel is removed. Potential direct impacts on paleontological resources would be limited to future ground-disturbing activities at levels or depths where resources may be present, including drilling, gravel mining, the construction of roads and other access routes, and pipeline construction.

NSO restrictions associated with setbacks or exclusion from biological and ecological areas, as described in **Table 2-3** in **Chapter 2** would reduce the acreage of geologic units affected and therefore the potential for affecting paleontological resources. NSO restrictions associated with setbacks from the Jago, Tamayariak, Okerokovik, and Katakaturuk Rivers would be common among all action alternatives. Setbacks from Canning Creek and Aichilik, Canning Hulahula, Okpilak, and Sadlerochit rivers would be similar across action alternatives with variations in the setback distances. They would reduce ground-disturbing activities in the surficial quaternary deposits next to these water bodies. Since streambank erosion is a common mechanism to expose Pleistocene fossils, these setbacks would prevent additional exposure of paleontological resources in surficial deposits. Marsh Creek and the Katakaturuk, Jago, and Okerokovik Rivers pass within 1 mile of several bedrock outcrops that may bear paleontological resources (Sagavanirktok, Canning, and Jago River formations); NSO setbacks from these rivers would reduce potential future impacts on paleontological resources in these outcrops simply because of the exclusion of ground-disturbing activities.

Potential future indirect impacts on paleontological resources are due to increased exposure, either to humans or the elements. Since the resources in the program area have not been extensively studied, increased exposure from infrastructure construction and operation near bedrock outcrops may support additional scientific research and identification of paleontological resources. Similarly, improving access to areas with paleontological resources may increase unauthorized fossil removal, looting, and damage. Removal of ground cover that would expose fossil-bearing units would expose the unit to weathering influences, which may disturb the resource and its context.

The Paleontological Resources Preservation Act (PRPA) of 2009 (16 USC 470aaa et seq and the final DOI rulemaking for the BLM at 43 CFR part 40) directs the BLM to implement comprehensive paleontological resource management programs on managed lands. While the existing understanding of paleontological resources in the program area is limited, preliminary assumptions regarding the potential for paleontological resources may be made by associating mapped geologic units in the program area and the PFYC values assigned to the same units outside of the program area.

Ground-disturbing work in the program area would be subject to field survey requirements implemented by the BLM through the PRPA. It stipulates that field surveys must be conducted by individuals with the experience and qualifications in paleontology appropriate to the activity, as described in the BLM's Paleontological Resource Use Permit Application. This preliminary assumption regarding correlation of units in and outside the program area would require field verification. It would be conducted before ground-disturbing activities begin, as a component of individual permit applications to the BLM. An associated evaluation of potential impacts on paleontological resources would therefore be made on the basis of further field investigations conducted as part of individual exploration or development plans.

Alternative B

Potential future impacts on paleontological resources from oil and gas exploration, development, and production under Alternative B would be the same as identified above for all action alternatives.

Alternative C

Alternative C would identify 526,300 acres as not available for lease sale and would include a greater acreage of NSO restrictions, as well as additional setbacks and increased setback distances from certain water bodies than Alternative B. Because the amount of land made available for ground-disturbing activities under Alternative C is less than that under Alternative B, fewer acres of surficial quaternary deposits and bedrock outcrops that may contain paleontological resources would be exposed and potentially affected by future oil and gas exploration, development, and production.

Alternative D

Alternative D would make 797,700 acres unavailable for lease sale and also has the greatest acreage NSO-restricted (726,300 acres). Compared to Alternative B, Alternative D would include setbacks from several additional waterbodies. The amount of land made available for ground-disturbing activities would be decreased under Alternative D, compared to Alternatives B and C. These restrictions and reduction in surface disturbance would result in fewer acres of surficial quaternary deposits and bedrock outcrops that may contain paleontological resources being exposed and potentially affected by future oil and gas exploration, development, and production.

Alternative D2

Out of all action alternatives, Alternative D2 would make the most acres unavailable for lease sale (1,163,500 acres) and have the least acres available for lease sale (400,000 acres). Of the 400,000 acres available for lease sale, 231,700 acres would be NSO-restricted. Additionally, the acres of estimated surface disturbance are the least among the action alternative (approximately 995). Therefore, of the action alternatives, Alternative D2 would have the fewest acres of surficial quaternary deposits and bedrock outcrops that may contain paleontological resources that could be exposed and potentially affected by future oil and gas exploration, development, and production.

Transboundary Impacts

Transboundary impacts on paleontological resources were not identified for any alternatives.

Cumulative Impacts

BLM (2018a) notes that activities with the potential to adversely affect paleontological resources are required to have professional inventories filed with the BLM before specific development projects begin. These include requirements to minimize or eliminate adverse impacts on paleontological resources. No past or present actions that could affect paleontological resources have occurred in the program area. Reasonably foreseeable future actions (**Appendix G**) that could affect paleontological resources would occur in the program area would be subject to the same inventory and impact minimization or elimination requirements; therefore, no cumulative impacts on paleontological resources would occur. The effects of climate change described under *Affected Environment Appendix B*, could influence the rate or degree of the potential cumulative impacts. Alternative A would have no potential cumulative impacts on paleontological resources from future oil and gas exploration, development, and production.

3.2.8 Soil Resources

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, transportation of oil and gas in and from the Coastal Plain, and abandonment. **Appendix C** identifies oil and gas actions that would likely occur; therefore, the analysis considers potential impacts on soil resources from on-the-ground activities.

Potential impacts from the development and operation of facilities identified in the hypothetical development scenario (**Appendix C**) are as follows:

- The placement of gravel fills for pads, roads, and airstrips
- Construction of VSMs for pipelines and building foundations
- Construction of ice roads and pads
- Removal of sand and gravel resources for embankment fills
- Impacts from exploratory seismic activities
- Abandonment and reclamation of sand and gravel pads, roads, and airstrips

These future pre- and post-leasing actions during exploration, development, production, and reclamation, including vehicular travel on snow and ice-covered tundra, change and disturb the insulating surface vegetation layer. They also increase the active layer thickness, thawing the permafrost, and developing thermokarst structures. Thermokarst changes the surface topography, increasing water accumulation, changing surface water drainage patterns, and increasing the potential for soil erosion and sedimentation (BLM 2018a; Jorgenson et al. 2010).

As gravel pads, roads, and airstrips are abandoned and reclaimed, the material would be removed and either reused and placed elsewhere or placed back in sand and gravel pits (**Appendix C, Section C.7.5**). This would allow development to remain within the 2,000-acre limit of development outlined by the directives of Section 20001(c)(1) of PL 115-97 (**Appendix C, Section C.6.1**).

The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, current management actions would be maintained as described in the Arctic Refuge CCP (USFWS 2015a). The Coastal Plain would remain undeveloped. No direct or indirect impacts on soils or permafrost would occur from post-leasing oil and gas activities.

Impacts Common to All Action Alternatives

Under all action alternatives, an estimate of total surface disturbance within the program area would be applied. However, after the PL 115-97 limit is reached no further disturbance would be permitted and all activities would need to take place on existing disturbance. Direct disturbance due to placement of gravel fills and VSMs for future construction of roads, pads, airstrips, and structures would occur and would result in potential direct impacts on soil quality and permafrost in and next to the gravel fill footprint. Changes to

surface drainage due to the placement of fills would cause permafrost thawing and subsidence and water accumulation. Placement of fills would cover soils and kill existing vegetation, altering the thermal active layer (USACE 2018). Installation of VSMs for pipelines would displace and disturb soils around the VSM (BLM 2018a).

Ice road and pad construction and seismic survey impacts on soil and permafrost resources vary, depending on the type of vegetation, disturbance type, and depth of the active layer; however, the depth of thaw increases each year following ice road construction (Yokel and Ver Hoef 2014; Reynolds et al. 2020). Seismic surveys and ice road and pad construction supporting exploration for resources would be performed during the winter to reduce impacts; however, impacts on vegetation and disturbance of the active layer would result in direct impacts on the soil quality and permafrost where seismic survey activities occur (USFWS 2014; Jorgenson et al. 2010; Reynolds et al. 2020). ROP 11 outlines the protection and mitigation measures to be used to minimize impacts on soils and permafrost from off-road tundra travel, to include seismic exploration and placement of gravel fills. These measures include seasonal off-road travel, vehicle specifications, protection and mitigation for multi-season routes, and ice road and pad construction.

By changing drainage patterns of surface water, ponds and channels form and concentrate water that accelerates permafrost thaw. Where drainage patterns are altered, blockages can lead to ponding and sediment deposition. Where drainage patterns redirect surface flow or increase velocities, such as at embankments, erosion of sediments occurs (BLM 2018a).

Potential indirect impacts on soil and permafrost in and next to the gravel fill footprints would be due to dust deposition and snow accumulation and fugitive dust plan will be required of all actions related to vehicle usage to mitigate the effects of dust deposition on the tundra. Fugitive dust would be suspended in the air by vehicle and equipment use and would settle onto surrounding vegetation and snow, which would decrease surface albedo.³ A decrease in surface albedo due to the presence of gravel pads and roads can increase absorption of solar radiation, accelerate the rate of snowmelt, and lead to permafrost thaw (USACE 2018). Dust accumulation can also affect the pH and increase heavy metal and mineral concentrations (Herngren et al. 2006) of the surrounding soils, which may lead to changes in the health and growth of vegetation that hold soil in place (Walker et al. 2022). Per ROP 6, the BLM may require the proponent to prepare an emissions plan that includes fugitive dust to address some of these impacts.

Blowing snow conditions due to changes in topography from the construction of pads and roads and VSMs/infrastructure foundations changes the thermal regime of the soils and permafrost next to the pad and road or VSMs. Snow accumulation insulates the underlying soil during the winter, increasing the overall soil temperatures and leading to permafrost thaw at those locations, specifically the edge of toe on road and pad embankments. Snow accumulation would occur more frequently on the leeward side of embankments (USACE 2018).

Future sand and gravel material extraction and transport would be required to provide materials for embankment construction and would have irreversible impacts on the permafrost and soils in the mine site footprint, around its perimeter, and transient impacts along transportation routes. **Section 3.2.9** discusses the impacts of material extraction in further detail.

Future reclamation of roads and pads would be subject to the permitting process. Removal of gravel would affect the underlying soil and permafrost resources by exposing the underlying soils to increased radiation and

³The light that is reflected from the surface

leading to continued permafrost degradation (USACE 2018). Where gravel bases are removed, thermokarst greatly affects the rehabilitation of the soils and vegetation; where ice-rich soils have thawed and formed deep lakes and troughs, intermingled with well-drained and high centered polygons, ice-poor and well-drained soils may result in shallow thaw lakes or ponds (Pullman et al. 2007).

Alternative B

The nature and type of potential impacts on soils and permafrost under Alternative B would be the same as identified above for all action alternatives. Under Alternative B, where lease stipulations would allow development of gravel pads, roads, or ice roads and pads, approximately 2,000 acres of soil and permafrost would be impacted. Approximately 172 miles of gravel roads would be needed to connect facilities and would traverse multiple soil and permafrost types. The impacts of ice roads and pads described in the impact analysis would vary, based on project-specific exploration and development plans; however, they are anticipated to be in addition to the acreage estimated above. Approximately 309 acres of disturbance to the ground surface and soils at material mining sites would be required for constructing the embankment infrastructure, estimated to be 172 miles of gravel roads and up to 14 pads.

Alternative C

The nature and type of potential impacts on soils and permafrost under Alternative C would be the same as identified above for all action alternatives; however, lease stipulations would limit surface occupancy to the western third of the program area, which is primarily composed of fine sand and silt deposits with restricted use of areas next to alluvial plains, which are composed of sands and gravels.

Under Alternative C, lease stipulations would allow surface disturbance, including gravel pads or roads, of approximately 1,464 acres, which would impact yedoma. Approximately 134 miles of gravel roads would be needed to connect facilities and would traverse multiple soil and permafrost types. The areal impacts of roads and pads described in the *Impacts Common to All Action Alternatives* section would vary, based on project-specific exploration and development plans. Approximately 220 acres of surface disturbance at material mining sites is required for constructing the embankment infrastructure, estimated to be 134 miles of gravel roads and up to 9 pads.

Alternative D

Under Alternative D, where lease stipulations would allow development of either gravel pads or roads, there would be approximately 1,040 acres of soil and permafrost impacted. The impacts of roads and pads described in the *Impacts Common to All Action Alternatives* section would vary, based on project-specific exploration and development plans. Approximately 154 acres of disturbance to the ground surface and soils at material mining sites is required for constructing the embankment infrastructure, estimated to be 98 miles of gravel roads and up to six pads.

Alternative D2

Under Alternative D2, where lease stipulations would allow development of either gravel pads or roads, there would be approximately 995 acres of soil and permafrost impacted. The impacts of roads and pads described in the *Impacts Common to All Action Alternatives* section would vary, based on project-specific exploration and development plans. Approximately 154 acres of disturbance to the ground surface and soils at material mining sites is required for constructing the embankment infrastructure, estimated to be 98 miles of gravel roads and up to six pads.

Transboundary Impacts

Transboundary impacts onto soil and permafrost are not anticipated. This is because under any alternatives the limits of development and anticipated impacts next to development are restricted to the program area.

Cumulative Impacts

The geographic area relevant for assessing cumulative impacts for soils and permafrost is in the program area. Proposed roads and gravel pads could have impacts on the soil, permafrost, and environment. Research by Walker et al. (2022) reveals that dust, surface water accumulation, and rising air temperatures all contribute to the cumulative impact on soils and permafrost within a 200-meter radius of construction activities. Furthermore, the compounding impacts of these factors could lead to the degradation of ice wedges, resulting in thermokarst ponding. This degradation could continue to worsen over time, creating a hydrogeologic system which brings changes to subsurface thermal conditions and vegetation, leading to an increase in erect-shrub cover.

Previous seismic survey explorations and an exploratory test well in the program area have typically resulted in minor disturbances to vegetation and to affected permafrost and changes to vegetation growth. Research has shown that the impact from seismic lines has recovered as much as 97 percent and camp trails and as much as 90 percent after 8 years of recovery (Emers et al. 1995); however, in some instances disturbance is still visible after 25 years of recovery (USFWS 2014; Jorgenson et al. 2010). Newer seismic technologies appear to cause less long-term damage (NRC 2003); with mitigation and awareness, future seismic surveys should result in reduced levels of impacts on the ground surface than previous efforts. However, it should be noted that conditions on the ground have also changed, particularly changes associated with climate, and therefore, changes in newer technologies may not reduce potential impacts associated with seismic.

Each of the hypothetical development scenarios could, at a minimum, directly affect the respective surface disturbance acreage of soils and permafrost, and indirectly affect its surrounding areas up to 200 meters (see above, Walker et al. 2022). Alternative D limits the leasable area to 765,800 acres and applies NSO stipulations on 726,300 acres of available area. The potential impacts are related to future changes to topography and landforms resulting in changes to soil chemical composition, drainage patterns, and erosion of soils. Disturbance to surface vegetation directly leads to changes in the thermal regime of soils due to placement of gravel fills for pads and roads and would last beyond the anticipated 85-year time frame. The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate (temporal) or degree and areal extents of the potential cumulative impacts.

Alternative A would not contribute to cumulative impacts on soils and permafrost from future post-lease oil and gas activities. This is because there would be no direct or indirect effects on soils under this alternative.

3.2.9 Sand and Gravel Resources

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, material excavation, and transportation of oil and gas

in and from the Coastal Plain (**Section 1.10.1**); therefore, the analysis considers potential impacts on sand and gravel resources from on-the-ground activities.

Direct impacts from the future development and operation of facilities identified in the hypothetical development scenarios (**Appendix C**) include the removal of sand and gravel resources for embankment fills. Sand and gravel removal impacts the availability of sand and gravel resources. Impacts are likely to be most significant during the development stage of an oil and gas project. After reclamation, gravel pits frequently turn into ponds in the Coastal Plain due to effects on local hydrological patterns by diverting water flows (Johnson 1987); any potential for long-term impacts would be minimized through proper reclamation. **Table 3-20** below shows the hypothetical project facilities and estimated surface disturbance under each alternative identified in the hypothetical development scenarios (**Appendix C**).

These actions change and disturb the surface vegetation layer and excavate landforms, resulting in changes to surface drainage and potential impoundment of water within a sand and gravel pit. Erosion of soils and thawing of permafrost, caused by exposure of permafrost due to pit excavations or due to changes in climate conditions, can further destabilize soils and result in slope instability within gravel sand and gravel sites.

The effects of climate change described under *Affected Environment* above, could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, current management actions would be maintained as described in the Arctic Refuge CCP (Chapter 2, USFWS 2015a). The Coastal Plain would remain undeveloped. No direct or indirect impacts on sand and gravel resources would occur from future post-lease oil and gas activities.

Impacts Common to All Action Alternatives

Sand and gravel resources would be required for future development projects under each of the action alternatives. Sand and gravel resources would need to be extracted for the construction of roads and pads. Investigations specific to material source development would be completed as part of the exploration and development phases of alternatives development. Sand and gravel would likely be obtained from more than one newly permitted mine site near the proposed development and would be accessed during winter via ice roads.

The BLM estimates that gravel pits and associated storage pads needed to supply oil exploration, development, and production in the Coastal Plain would encompass between approximately 140 to 310 acres under all alternatives. The acreage required for gravel mining could increase or decrease, depending on local conditions. Gravel supply plans would be detailed in project-specific NEPA documentation for any future developments (**Appendix C.9.4**). Reclamation of development post-production would include removing gravel roads and pads; gravel would be reused for other production infrastructure or placed back into gravel mines (**Appendix C.7.5**). Where gravel bases are removed, the presence of thermokarst features greatly affects the rehabilitation of the soils and vegetation. This is based on the soil and vegetation type and methods of reclamation (Pullman et al. 2007). Replacement of material in the mine sites would affect the thermal regime established by removing material and any ponding that may have occurred.

Sand and gravel mining would alter the geomorphic landforms and remove vegetation, leading to permafrost thaw. At mine site closure and, depending on site characteristics and reclamation requirements, the mine sites could be inundated with surface water, forming a pond. By changing the drainage patterns of surface water,

Table 3-20
Hypothetical Projected Facilities and Estimated Surface Disturbance by Alternative¹

Facility Type	Alternative B		Alternative C		Alternative D		Alternative D2	
	Number of Potential Facilities	Estimated Acres of Disturbance	Number of Potential Facilities	Estimated Acres of Disturbance	Number of Potential Facilities	Estimated Acres of Disturbance	Number of Potential Facilities	Estimated Acres of Disturbance
CPF, airstrip, anchor well pad, and other associated service facilities	4	200	2	100	1	50	1	50
Satellite pads	14	168	9	108	6	72	3	36
Roads	172 miles	1,290	134 miles	1,005	98 miles	735	98 miles	735
VSMs (pipeline miles)	212 miles	8	175 miles	7	120 miles	5	110	5
Seawater treatment plant	1	15	1	15	1	15	1	15
Barge landing and storage	1	10	1	10	1	10	1	10
Gravel pits and stockpiles ²	—	309	—	220	—	154	—	144
Total (approximate)	—	2,000	—	1,464	—	1,040	—	995

¹See **Appendix C, Table C-4** for estimated facility sizes and acres of estimated surface disturbance by facility. All potential facility numbers and surface disturbance acreages are general hypothetical estimates and are not based on specific project proposals. Acreages are approximate and rounded to the nearest acre.

²The number of gravel pits is dependent on the locations of gravel resources in relation to project components and thus is unknown at this time.

— = not applicable

ponds and channels form and concentrate water that accelerates permafrost thaw. Where drainage patterns are altered, blockages can lead to ponding and sediment deposition. Where drainage patterns redirect surface flow or increase velocities, such as at embankments, sediments erode. Water impoundment in a flooded pit would likely remain unfrozen near the bottom, creating a thaw bulb around and beneath the pit, which may cause the excavation walls to slough and deposit material into the pit (BLM 2018a).

Removal of gravel from areas near or in streams could change stream configurations, hydraulics, flow patterns, erosion, sedimentation, and ice damming (USACE 2018). These actions would not occur under Alternative A.

Alternative B

Approximately 10,982,000 cubic yards of material would need to be mined for future gravel pads and roads. Material extraction sites, including storage and operation areas, for the amount of material required would disturb approximately 310 acres under Alternative B. Multiple material source sites are expected to be used to meet the material demands and reduce haul distances. Based on areas of high development potential open for leasing under this alternative (**Map 3-6 in Appendix A**), material sources are anticipated to be primarily in the outwash sediments from the Sadlerochit Mountains in the southwestern portion of the program area and in alluvial and fluvial deposits of larger rivers. Under this alternative, ROP 24 (**Table 2-3**) would require a plan approved by the BLM Authorized Officer which would detail design, construction, and reclamation and consider ways to reduce impacts of mineral materials mining on other resources.

Alternative C

Under Alternative C, a total estimated surface disturbance of 1,464 acres would occur, which would reduce the total amount of infrastructure that would require sand and gravel resources compared to Alternative B. Approximately 7,824,000 cubic yards of material would need to be mined for future gravel pads and roads. Material extraction sites, including storage and operation areas, for the amount of material required would disturb approximately 220 acres under Alternative C. Multiple material source sites are expected to be used to meet material demands and limit haul distances. Based on areas of high potential mineral leasing under this alternative, material sources would be primarily from alluvial and fluvial deposits between the Canning and Tamayariak Rivers; material resources may be limited to streams and topographic high points. Under this alternative, ROP 24 (**Table 2-3**) would require a plan approved by the BLM Authorized Officer which would detail design, construction, and reclamation and consider ways to reduce impacts of mineral materials mining on other resources, as well as limit locations to outside the active floodplains of the four rivers that support populations of freshwater, anadromous, or endemic fish (Canning, Sadlerochit, Hulahula, and Aichilik rivers), and ensure that any mineral material mining sites used as water storage reservoirs are located far enough from any site that generates or maintains more than 220 gallons of fuel, drilling fluids, or other hazardous materials to avoid contamination of the reservoir.

Alternative D

Under Alternative D, surface disturbance in the program area would be estimated at 1,040 acres, which would reduce the total amount of infrastructure that would require sand and gravel resources compared to Alternatives B and C. Approximately 5,488,000 cubic yards of material would need to be mined for future gravel pads and roads. Material extraction sites, including storage and operation areas, for the amount of material required would disturb about 155 acres under this Alternative D. Multiple material sources' sites are expected to be used to meet material demands and limit haul distances. Because much of the program area is closed to leasing or has NSO stipulations applied under this Alternative D, the locations of development infrastructure and sand and gravel mines would be limited. Material sources are anticipated to be located

wherever suitable sources can be found in proximity to infrastructure including from deposits near the: Canning, Tamayariak, Katakaturuk, or Jago Rivers where material resources may be limited to streams and topographic high points and scattered along the coast with potential for outwash sediments. If insufficient sand and gravel resources are available in areas open to extraction, material might also be transported from pits located outside the program area boundary or on Native lands.

Under this Alternative D, ROP 24 (**Table 2-3**) would require a plan approved by the BLM Authorized Officer that would detail design, construction, and reclamation, and it would consider ways to reduce impacts of mineral materials mining on other resources. It would also prohibit the construction of gravel mine sites in the: Canning/Staines River, West Fork Tamayariak River, Middle Fork Tamayariak River, Tamayariak River, Itkilyariak Creek, Hulahula River, Aichilik River, Sadlerochit River, and Sadlerochit Spring Creek, which support resident, anadromous, or endemic fish populations. This ROP would also require that any mineral material mining sites used as water storage reservoirs are located far enough from any site that generates or maintains more than 220 gallons of fuel, drilling fluids, or other hazardous materials to avoid contamination of the reservoir. It would also require that for mining proposed at outcrops or cliffs, the lessee/permittee/operator would map suitable raptor nesting habitat and conduct surveys for known raptor nest sites prior to submitting a Plan of Operations.

Alternative D2

Under Alternative D2, surface disturbance in the program area would be estimated at 995 acres, which would be the least of all action alternatives. Approximately 5,128,000 cubic yards of material would need to be mined for future gravel pads and roads. Material extraction sites, including storage and operation areas would disturb about 144 acres under Alternative D2. Multiple material sources sites are expected to be used to meet material demands and also limit haul distances. Among the alternatives, Alternative D2 would have the most land closed to leasing, which would result in the most limitation on the locations of development infrastructure and sand and gravel mines. Material sources are anticipated to be located wherever suitable sources can be found in proximity to infrastructure. This includes deposits around the Canning, Tamayariak, and Katakaturu Rivers as well as Marsh Creek, where material resources may be limited to streams and topographic high points and scattered along the coast with potential for outwash sediments. If insufficient sand and gravel resources are available in areas open to extraction, material might also be transported from pits located outside the program area boundary or on Native lands.

Under this alternative, ROP 24 (see **Table 2-3**) would require a plan approved by the BLM Authorized Officer in coordination with the USFWS and local traditional knowledge holders that would detail design, construction, and reclamation, and it would consider ways to reduce impacts of mineral materials mining on other resource requirements and standards as Alternative D2. All other requirements and standards under ROP 24 would be similar to Alternative D.

Transboundary Impacts

Transboundary impacts on sand and gravel resources are not anticipated under any alternatives. This is because no material sources are expected to be located outside of the program area.

Cumulative Impacts

The geographic area relevant for assessing potential cumulative impacts for sand and gravel resources is the program area. Past and present actions affecting sand and gravel in the program area are expected to continue; these include onshore oil and gas exploration, development, and production on the North Slope, community development and infrastructure projects, and natural riverbank and slope erosion. Potential direct impacts

under the action alternatives, which would include a reduction in availability of sand and gravel resources, would add to impacts from past, present, and reasonably foreseeable future development, to further limit the availability of sand and gravel resources in the program area. Alternative B would require more cubic yards of material, compared to the other action alternatives. Indirect impacts would involve permanent changes to landforms and vegetation, due to material extraction, which would lead to changes in permafrost. Changes to permafrost would result in subsidence, formation of thaw bulbs, and changes to drainages in and around the perimeter of material sites. The effects of climate change described under *Affected Environment (Appendix B)* could influence the rate or degree of the potential cumulative impacts, particularly the additive impacts on soil destabilization within sand and gravel sites. Alternative A would not contribute to the cumulative impacts on sand and gravel resources due to continued impacts from past and present activities.

3.2.10 Water Resources

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on water resources from on-the-ground activities.

Hydrology and water quality are closely linked, and the discussion regarding potential impacts on water resources is combined in this section. Future development activities that can affect water resources include the following:

- Gravel mining
- Placement of gravel fill for infrastructure, such as roads, pads, and airstrips
- Installation of culverts and bridges
- Construction of pipelines and VSM footers
- Construction of ice roads and pads
- Extraction of water supply from local lakes or rivers for ice roads, construction, drilling, and operation
- Wastewater discharge
- Saltwater treatment facilities
- Seismic surveys and exploration

The following potential future impacts on surface water hydrology and water quality would be similar to some of those reported for the NPR-A, as described in BLM 2012, Section 4.5.4.2, and 2004, Section 4F.2.2.2:

- Shoreline disturbance
- Thermokarst (marshy hollows and small hummocks formed by thawing permafrost)
- Blockage or convergence of natural drainage
- Disruption of surface water hydrology and surface water sheetflow
- Increased stages and velocities of floodwater
- Increased channel scour

- Increased surface erosion and wind scour from damage or removal of organic mat
- Increased bank erosion
- Increased sedimentation potentially contributing to higher turbidity and concentrations of suspended sediment
- Increased potential for overbank flooding
- Changes in recharge potential from removal or compaction of surface soils and gravel
- Produced-water spills
- Petroleum hydrocarbon spills and hazardous material spills
- Demand for water supply
- Changes to water chemistry, temperature, and increased salinity in lakes
- Increased local offshore salinity and turbidity
- Changes to local offshore water quality
- Changes in lake levels

The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

The sections below detail the potential impacts to water resources by alternative, including impacts common to all, and are summarized in **Table 3-21** through **Table 3-23**.

Alternative A

Under Alternative A, no federal minerals in the program area would be offered for future oil and gas lease sales. Current management actions and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). Changes to water resources would continue to occur along current trends (climate change). No direct or indirect impacts on water resources would result from oil and gas leasing activities under Alternative A.

Impacts Common to All Action Alternatives

Changes in Surface Water Flow

Changes to surface water flow would result from the various aspects of future development and include short-term, long-term, and permanent changes to water resources from exploration, construction, and production. The effects from these activities vary in intensity and scope and involve alterations to stream and lake stage (water level), stream velocities, water quality and water volume, and surface runoff processes and drainage networks.

Sand and gravel would be mined for future construction of pads, roads, and air strips (**Appendix C**). Removing gravel from areas near (or in) streams and lakes would change stream or lake configurations, stream hydraulics, lake shoreline flow patterns, erosion, sedimentation, and ice damming (NRC 2003). Gravel extraction from streams and rivers would mobilize sediment and would increase turbidity or sedimentation at downstream locations (BLM 2012, Section 4.5.4.2, pp. 12 and 13). No specific gravel mining sites have been identified associated with the proposed leasing program; however, estimated volumes of the hypothetical development scenarios are summarized in **Appendix C**.

Gravel pits (removed from rivers or lakes) are another option for gravel and many potential sources exist at rock outcroppings in the program area. Development of these sources would create dust that could be deposited on tundra vegetation, water bodies, or the snowpack, accelerating melting. The water in a flooded gravel pit would likely remain unfrozen near the bottom, altering the thermal regime and creating a thaw bulb

around and beneath the pit, potentially resulting in localized thermokarst. The steep side slopes of excavation pits would likely slough as they thaw, becoming more gradual over time and causing some slight infilling. BLM-approved reclamation plans would be required when the pit is decommissioned.

Future exploration and construction, such as the placement and construction of gravel pads, roads, air access facilities, culverts, and bridges, could affect natural drainage patterns. This would come about by creating new channels, inundating dry areas, causing ground surface subsidence under some seismic trails, and starving wetlands of water on the downstream side of roads. Lake and stream stage (water level) and stream flow (volume) could either increase or decrease, depending on road/pad alignment. The resulting changes in stream velocity would influence erosion and sedimentation rates.

Groundwater flow can be interrupted by placing fill and compressing the active layer, potentially resulting in pooling on the upslope side of roads and pads, leading to thermokarst and blocking recharge to lakes. Groundwater flow beneath roadway embankments may increase the thaw of permafrost, thus requiring appropriate mitigation measures for flow beneath and through embankments (Darrow et al. 2013). Potential disturbance of the vegetation or water and wind erosion could initiate thawing of the upper ice-rich zones and trigger the development of thaw-lakes.

Modification of the natural surface water drainage patterns would block or redirect flow resulting in some water courses experiencing increased flow while others may experience reduced flow. Disruption of streambeds and stream banks could remove protective shoreline vegetation and lead to channel erosion and sedimentation, formation of meltwater gullies, plunge pools from perched culverts, and formation of alluvial fans in streams and lakes (BLM 2012, Section 4.4.4.2. p. 377).

An example of future construction that could affect hydrology is the displacement of a lake or pond by fill or placing fill (such as an airstrip or road) transversely across grade, thereby blocking the natural drainage patterns when the snow melts. Placing fill transversely across grade or the predominant wind direction may also change snow accumulation patterns, which, in turn, may change drainage patterns when the snow melts. Impacts on drainage patterns would increase inundation or drying of affected areas. Increased inundation may in turn increase thermokarst action in the affected areas.

Placing gravel fill on tundra would change recharge potential, block natural drainage, and change the existing hydrologic regime; erosion of roads and pads could increase sedimentation onto the tundra or into waterways. During construction, sediments and dust would be disturbed and deposited on snow and ice during the winter or on tundra and open water during the summer. The sediments and dust would be introduced into the water column, increasing turbidity and sedimentation. A road or airstrip aligned perpendicular to stream channels and the direction of sheet flow would have a greater potential to impound sheet flow and shallow groundwater than a road or airstrip aligned parallel to existing drainage patterns. Detailed descriptions related to erosion and sedimentation during the construction phase are provided in BLM 2004, Section F4.2.2.2.

Future mining pads, airstrips, and roads would be designed to account for thermal criteria (minimum thickness to prevent permafrost degradation) and hydrologic criteria to minimize potential impacts on the surrounding area, as discussed in ROPs 21 and 22.

Where gravel fill is placed in wet areas to construct a future road, pad, or airstrip, the receiving waters would temporarily have higher suspended solids concentrations, greater turbidity, and contaminant concentrations (depending on the underlying geology). Fugitive dust that enters surface water bodies would also increase

turbidity and sedimentation. Further information regarding turbidity during the construction phase is provided in BLM 2004, Section F4.2.2.2.

Culverts would likely be used extensively under all action alternatives in the future for access road water crossings and to provide cross drainage. The design criteria for all culverts are such that they would avoid restricting fish passage or adversely affecting natural stream flow (ROP 22). Culverts would be installed at regularly spaced intervals to mitigate the risk of sheet flow interruption and thermokarst action. Final design of culverts depends on the spring ice breakup and snow melt characteristics for those drainages that could affect the road.

The potential impacts of increased stream velocities through culverts during floods are addressed in BLM 2004, Section F4.2.2.1. Constricting flows would increase stream velocities and a higher potential for ice jams, scour, and stream bank erosion. Impeding flows would result in a higher potential for bank overflows and floodplain inundation. These potential impacts need to be minimized by incorporating design features to protect the structural integrity of the road- and pipeline-crossing structures to accommodate all but the low probability floods. Once installed, aboveground pipelines (i.e., VSMS) would have nearly no effect on stream and water flow characteristics.

The configuration of gravel fills also affects impacts; a linear gravel pad (runway) running perpendicular to the hydraulic gradient would result in a larger extent of hydrological impacts than those running parallel to the drainage or a consolidated, square pad of similar acreage. The duration of potential impacts would be long term because the roads and pads would remain during operations and likely permanently change flow patterns.

Future pipeline construction in the program area would have effects on water resources related to ice road construction and associated water withdrawals from local lakes. Narrow drainages are typically crossed using elevated pipelines on suspension spans. Pipelines would be routed to avoid lakes. Once installed, aboveground pipelines would have nearly no impact on water flow characteristics but would affect water resources quality in the event of an oil spill.

Potential impacts on hydrology associated with construction of gravel pads, roads, and airstrips would persist through the life of an individual project, including natural drainage patterns, stream stage and stream flow, stream velocity, groundwater flow, and lake levels, as described previously. The duration of impacts would be long term because the gravel infrastructures would remain during operation. Reclamation has not been proven for gravel removal in the arctic environment once operations have ceased.

Ice roads and ice pads would be used extensively in the future for seasonal vehicle access and would require removal, breaching, or slotting stream crossings if fish passage is a concern during spring break up and their location would be controlled to avoid undue vegetation damage (ROP 11). Potential impacts on hydrology associated with construction of ice roads and pads would be similar to impacts from gravel infrastructure as described above. Ice roads and pads may alter natural drainage patterns, obstruct flow, affect channel stability or alignment, and lead to erosion and sedimentation (BLM 2020d). Duration of impacts could be short or long term, depending on the need to support exploration and operation in combination with long term gravel infrastructure.

Variations in microtopography, including vegetation types, influence hydrologic and ecosystem function of tundra landscapes within the program area, as the land surface continually adjusts to microscale thermal and hydrologic changes. Seismic surveys have high potential to impact the microtopography through mechanical disturbance of the vegetative mat and soil, altering the dynamics of solar radiation subsequent summers,

potentially resulting in deepening of the active layer and thawing permafrost. Lingered snow and water seismic trails can result in channeling of water, thermokarst, and alternation of drainage patterns. Sloped terrain can result in increased erosion and disturbance due to flowing water. Expanding drainage networks and increased hydrologic connectivity resulting from seismic-exploration disturbances can potentially impact the landscape for years or decades after the initial disturbance (Raynolds et al. 2020).

Studies of 1984-1985 2D-seismic surveys in the program area, as well as 2D- and 3D-seismic surveys across the North Slope, indicate that winter off-road traffic is likely to result in some areas with permanent changes to the landscape and hydrologic conditions despite efforts to reduce impacts, such as minimum snow cover and freeze depths. Trails created by mobile camps were found to cause more impacts on vegetation than seismic equipment. Measurable disturbances from the 1984-1984 surveys, including thermokarst, subsidence, and channeling of water, were evident more than three decades later in 3 percent of seismic trails and 5 percent of camp-move trails, with the impacts being essentially permanent. Depending on the specific details of proposed future exploration and development, seismic studies are likely to result in varying levels of disturbance to the microtopography with direct and long-term impacts on permafrost and hydrologic connectivity (Raynolds et al. 2020).

Water Withdrawals

Future water withdrawals to support components of the action alternatives would affect the water levels of lakes used as water sources and any connected water body, such as streams or wetlands. Only permitted lakes or reservoirs (under ADNR Temporary Use Authorizations and, if required, ADFG Fish Habitat Permits) would serve as water sources. Typical consumptive water use would involve the following:

- Seasonal construction of ice roads and pads
- Drilling, hydraulic fracturing, and waterflooding
- Hydrostatic testing
- Dust abatement on roads, pads, and airstrips during summer
- Potable water
- Fire suppression and maintenance

Surface water withdrawals in the future for construction of ice roads, dust abatement, and operations would affect shallow groundwater levels, surface water levels, and drainage patterns during summer season. Lakes would be the principal supply for freshwater during construction with alternatives to include a seawater desalination plant or approved withdrawals from rivers or flooded gravel extraction sites. Ice roads and ice pads would be constructed to support construction under all action alternatives for access during the winter season. Although estimates of water use for oil and gas activities on the North Slope have been made in literature, the actual amount of water used would be project specific and would be based on approved North Slope BMPs, new technology, and the specific needs of the project, such as the width of ice roads, number of camps, number of crew, and ice pad size.

The impacts of water withdrawals are likely to include changes in the active layer groundwater levels, potential drying of vegetation, changes in lake shoreline location and exposure of lakebed to wind and water erosion, changes in the local drainage pattern near lakes and interconnectivity of lakes due to water level changes. These impacts would be mitigated through ROPs 8 and 9 which require water withdrawals to be conducted in such a manner as to maintain natural hydrologic regimes in order to conserve fish and wildlife and their habitats. While analysis of the broader potential impacts of lake water withdrawals is summarized in this EIS, it must also be noted that for any future development to occur, the stipulations and ROPs in the

lease sale would require future analysis of water use, water sources, and how much water would be allowed to be withdrawn from the source.

Future ice road construction over lakes that do not freeze to the bottom could affect dissolved oxygen concentrations. An ice road that crosses such an intermediate-depth lake could freeze the entire water column below the road, isolating portions of the lake basin and restricting circulation. With mixing thus reduced, isolated water pools with low oxygen would result. Details related to dissolved oxygen concentrations during ice road construction are provided in BLM 2004.

Changes to Surface Water Quality

Changes to water quality could occur during the exploration, construction, and operation phases of a future oil and gas development project. After construction is complete, gravel from roads, pads, and airstrips would be the main dust source; dust fallout from vehicle traffic could increase turbidity and contaminant loads in ponds, lakes, creeks, streams and rivers, and wetlands that are next to roads and construction areas. Water quality would also be degraded in the short term due to increased turbidity resulting from dust fallout, flooding, erosion, or bank failures, which could lead to changes in dissolved oxygen or other water quality changes. Changes to water quality would be subject to ADEC's water quality standards and potentially their wastewater discharge permit requirement. In atmospheric deposition, air pollutants are removed from the atmosphere and subsequently deposited in aquatic and land-based ecosystems. This can occur through precipitation or through the dry gravitational settling of particles onto soil, water, and vegetation. A primary issue of atmospheric deposition is the formation of acids, particularly nitrogen and sulfur species. This can happen as acid rain and snow, and results in the subsequent deterioration of lakes, streams, soils, nutrient cycling, and biological diversity. Atmospheric deposition of heavy metals of concern, including mercury in particular, in Arctic Alaska could detrimentally impact surface water quality (Snyder-Conn et al. 1997).

A potential direct impact from winter road and pipeline construction would be disturbance of tundra soils and vegetation (see **Section 3.2.8**, Soil Resources and **Section 3.3.1**, Vegetation and Wetlands). Disturbed and exposed soils are more susceptible to erosion and subsequent sedimentation during spring breakup of ice and subsequent flooding than undisturbed areas; however, Lease Stipulation 1 and ROPs 9, 11, and 12 dictate permissible locations and elevations of pads and other infrastructure that would mitigate the potential of disturbed soil entering the spring breakup flooding. Fugitive dust from construction could also be deposited on snow and ice during the winter. When melting occurs, this dust can accelerate melting and enter surface water bodies, increasing turbidity and contaminant concentrations, depending on the underlying geology.

Freshwater would be withdrawn from lakes in the program area in the future for several primary uses: construction of ice roads and pads, seismic surveys and exploration, pipeline maintenance, production drilling, and potable water at camps. Water would also be used for dust control on roads. When water is removed from its native location and placed elsewhere, it disrupts natural drainage patterns. This water would be recharged in the spring when snow and ice melt increase flow volumes in connected water bodies, assuming that withdrawal rates would not exceed recharge rates, based on Lease Stipulations, ROPs, and permitting requirements. Variance in snow distribution across the program area will impact recharge rates. As lakes in the program area are scarcer and tend to be more hydrologically isolated than NPR-A, it is uncertain if snowmelt will be adequate to recharge lakes on a consistent basis. Potential long-term, adverse impacts on the surface water quality of lakes would result if permitted withdrawals exceed available recharge. Hydrologic modeling suggests that snowmelt may be insufficient to replenish water withdrawal volumes depending on development scenarios and further study is needed (Gädeke et al 2022).

Water withdrawal from lakes causes a temporary increase in salinity, calcium, magnesium, sodium, potassium, and chloride levels, and an increase in dissolved oxygen (DO). Pumping affects lakes that are shallow with less volume much more than deeper lakes. There has been no notable change in pH, temperature, or nitrates and sulfates levels in water chemistry measured in NPR-A; however, effects on lakes in the project area may differ. By August, there did not seem to be a difference between lakes that had been pumped and reference lakes and pumping did not have a notable affect in ice growth (Michael Baker Jr. Inc. 2002). There is a potential for wastewater discharge from future oil and gas activities, such as sanitary/domestic, secondary containment, gravel mine dewatering, and hydrostatic test water, and could increase pollutant loads to water bodies. These discharges would occur under the appropriate Alaska Pollutant Discharge Elimination System (APDES) authorization including Facilities Related to Oil and Gas Exploration, Production, and Development in the North Slope Borough GP (AKG32000), sanitary/domestic wastewater treatment facilities (AKG572000, AKG573000); however, it is more likely that wastewater would be placed in underground injection control wells under Class 1 Underground Injection Control (UIC) Well GP (2016DB0001). A thorough discussion of the water quality effects resulting from development can be found in BLM 2004, Section 4F.2.2.2.

It is likely that only treated (secondary treatment) domestic wastewater would be discharged to water bodies/wetlands with authorization from the applicable APDES permits; it is not anticipated that there would be an increase in fecal coliform counts over the naturally occurring concentrations outside of authorized mixing zones.

Drinking water resources are unlikely to be affected because not only would they have to meet State of Alaska Water Quality Standards for drinking water, the Kaktovik drinking water source is located on Barter Island. Barter Island is off limits to the lease sale in all alternatives. Permitting, permit authorizations, and BMPs of any oil and gas activities around the drinking water resources would mitigate any potential impacts on the resources.

Spills of oil or other hazardous material could occur in the future from pipelines, storage tanks, production facilities and infrastructure, drill rigs, and vehicles during the drilling and operation phases. Spills occurring from pipelines, leaving pads, and roadbeds could enter water sources, reaching tundra ponds, lakes, creeks, or rivers. Spills can occur at any time the year but have the highest likelihood of entering the water during spring breakup flooding; however, the required Lease Stipulations 1 and 4 and several ROPs (e.g., 9, 11, 12, and 19) that require practices to be undertaken to minimize spills would decrease the likelihood that spilled contaminants would enter the water column throughout the year. The potential impacts associated with oil spills are described in **Section 3.2.11**, Solid and Hazardous Waste.

Changes to Groundwater Quantity and Quality

UIC wells are required to be used to dispose of pumpable wastes as stated in ROP 2. These wells are required by the EPA to be drilled thousands of feet below the lowermost underground source of drinking water and into deep confined rock formations. In the ACRP the permafrost ranges from 600 to 1,300 feet thick. The Class 1 UIC Wells permitted on the North Slope range in depths of 2,000 to 8,700 feet deep depending on the formation being drilled and injected into. Groundwater in the ACRP is likely to be found in thaw bulbs under rivers and lakes. The springs are thought to be fed high up in the mountains along fault lines and with the thick permafrost layer being an impenetrable layer underneath, it is unlikely that the pumpable waste products being injected into a UIC well would come into contact with the groundwater feeding springs and streams in the ACRP. To mitigate potential impacts on perennial streams and connected aufeis, Lease Stipulation 3 would provide varying levels of protection for springs (depending on the alternative), including requiring studies to

show that drilling and UIC wells would not impact flow to or from the perennial springs or contaminate perennial springs.

During future gravel mining, it is probable that shallow taliks and supra-permafrost water zones would be temporarily eliminated in the immediate vicinity of a gravel mine. The effect of this loss on water resources is localized if the talik network is discontinuous. Supra-permafrost water zones may be reestablished over time if the ground does not refreeze after the mine is decommissioned. The subsurface water-bearing zone would be permanently eliminated in the immediate footprint of the mine and would be replaced by surface water that is connected to the shallow groundwater. Many of these impacts would be mitigated through proper drainage design and adherence to the Lease Stipulation 1 and ROPs 9, 12, and 24.

Changes to Marine Waters

There is a potential for impact on marine water from barge docking sites, dependent on the design and mitigation efforts employed. During construction, the turbidity and TDS concentrations could increase and be short term. If dredging is required to allow boats with bigger drafts to dock, then greater turbidity and TDS concentrations are likely to be experienced short term. A new permanent dock facility in the Coastal Plain would likely not be constructed and instead a floating dock would be used for development support (**Appendix C**); this would reduce potential water quality impacts associated with dredging. During all phases of the project the main impact of concern is a spill of oil or other hazardous materials. The extent of such contamination would be related to the size, nature, and timing of the spill. If a spill were to happen during the open-water or broken-ice seasons, hydrocarbons and other contaminants dispersed in the shallow estuarine water column could exceed acute-toxic criteria during the initial spill period. Impacts on marine waters are more thoroughly described in BLM (2018). To mitigate these impacts, the operator would be required to follow Lease Stipulation 4 preventing surface occupancy of various oil and gas infrastructure in coastal waters, lagoons, or barrier islands, and Lease Stipulation 9 requiring development of avoidance and monitoring plans, comprehensive prevention and response plans, including Oil Discharge Prevention and Contingency Plans and spill prevention, control, and countermeasure plans. Further, the operator would be required to maintain adequate spill response capability to effectively respond during periods of solid ice, broken ice, or open water. The potential impacts associated with oil spills or other hazardous material spills are described in **Section 3.2.11, Solid and Hazardous Waste**.

A STP could be constructed on the coast to source saline water for waterflooding, reservoir pressure support, or other subsurface uses. While the nearshore marine environment has lower salinity, there are byproducts of the desalination process that include brine, filter backwash water, and rinse/cleaning water. These byproduct streams could increase salinity, iron, turbidity, total suspended solids and biochemical oxygen demand in the water body in which it is being discharged. At the discharge point before mixing can occur, the salinity would spike, creating a habitat that only marine life that can tolerate the higher salinity to survive in the discharge zone. Typically, once the discharge is allowed to mix, the water quality returns to the typical levels of the water body. Discharges of the byproducts in the future from an STP would be required to follow ROP 2 and to meet standards in the treatment plant's APDES discharge permit, including a requirement for further treatment, and potential mixing zone requirements.

Alternative B

Alternative B includes approximately 1,563,500 acres available for lease sale. Lease Stipulation 1 provides setbacks (0.5 mile to 1 mile) and prohibits permanent oil and gas facilities and supporting infrastructure in the streambeds of the Canning, Hulahula, Aichilak, Okpilak, Jago, Sadlerochit, Tamayariak, Okerokovik, Katakturuk Rivers and Marsh Creek; however, essential pipelines and road crossings would be permitted

through the setback areas in accordance with PL 115-97. Gravel mines could also be permitted in setback areas. The operator would be required to demonstrate that there are no practicable alternatives to locating facilities in the area, the proposed actions would maintain or enhance the resource functions, and the facility would be designed to withstand a 100-year flood event.

These actions are designed to minimize the disruption of natural flow patterns and changes to water quality for these specific water bodies. Additionally, ROPs 2, 3, 8, 9, 11, 12, 15, 16, 19, 20, 21, 22, 24, and 41 would minimize potential impacts on water resources under Alternative B. Lease Stipulation 3 requires studies to ensure drilling will not disrupt flow to or from perennial springs and UIC wells will not contaminate any perennial springs to protect the springs, important related riparian habitat, and associated aufeis accumulations.

Alternative C

Alternative C would provide additional water resource protections by increasing setbacks, decreasing the total acreage allowed for lease sales, and restricting the timing of certain activities. Alternative C includes 1,037,200 acres available for lease sale. This alternative would make high potential areas available for lease, while considering additional considerations for caribou calving and post-calving habitat. Lease Stipulation 1 increases the setback distances on rivers from Alternative B (1-4 miles) and adds additional rivers to the list for setbacks with a minimum setback of 0.5 miles from the ordinary high-water mark. Lease Stipulation 2 reduces impacts on water quality by prohibiting permanent oil and gas facilities and infrastructure within 0.5 mile of the ordinary high-water mark of any water body in Townships 8 and 9 north of the Canning and Tamyariak watersheds. Lease Stipulation 3 further protects water quality by removing areas offered for lease sale within 3 miles of the Sadlerochit, Fish Hole 1, Tamayariak, and Okeravik Springs and the east bank of the Canning River as well the area within 1 mile of the aufeis deposits created by these springs. Lease Stipulation 5 removes polar bear river denning habitat within 5 miles of the coast on selected rivers and Lease Stipulation 9 does not allow exploratory well drill pads, production well drill pads, and central processing facilities in coastal waters, lagoons, or barrier islands in the boundaries of the program area or 2 miles inland from the coast.

Alternative D

Alternative D would provide more protections for water resources' impacts by further increasing setbacks; decreasing the total acreage allowed for the lease sales; and restricting the timing of certain activities. Alternative D includes 765,800 acres available for lease sale. Lease Stipulation 1 would protect the water quality, quantity, and diversity of fish and wildlife habitats associated with springs/aufeis by adding additional rivers to the list from Alternative C with minimum setbacks of 0.5 mile from ordinary high watermark as well as a 0.25-mile setback for any other named or unnamed river. Lease Stipulation 3 would require studies on perennial springs and waste injection wells before drilling like for Alternative B, but additional consultation with Tribal Governments and State of Alaska would be required. Alternative D removes areas offered for lease as described for Alternative C to protect perennial springs, associated downstream habitat, and aufeis deposits; no leasing would be permitted within 4 miles of the Fish Hole 1 Spring. Withdrawals from springs identified in Lease Stipulation 3 and anadromous rivers would be prohibited; however, unlike Alternative B, summer water withdrawals from rivers may be permissible with a stipulation that water levels and water quality are monitored or modelled (ROP 8). Lease Stipulation 4 would prohibit operations on major nearshore marine waters, lagoons, barrier islands, and coastal islands between May 15 and November 1, depending on sea ice.

Alternative D2

Alternative D2 would provide the most protections for water resources by further decreasing the total acreage allowed for the lease sales. This alternative would include additional protections for springs and aufeis and restrict the timing of certain activities. In Alternative D2, 400,000 acres would be available for lease sale, with leasing limited to areas with only high hydrocarbon potential and expanded areas of no leasing around the Canning and Staines Rivers and in Camden Bay. Alternative D2 provides additional protections for springs and aufeis, where 170,800 acres associated with springs/aufeis would not be offered for lease and 117,800 acres associated with springs/aufeis would be subject to NSO. Setbacks would be similar to Alternative D. Lease Stipulation 1 would increase setbacks for Marsh Creek and Carter Creek to 0.5 miles, while removing the 0.25-mile setback for unnamed rivers provided under Alternative D. Lease Stipulation 5 would prohibit oil and gas activities from the coastline to 2 miles inland between October 30 and April 30 to protect denning polar bears. Lease Stipulation 9 would prohibit operations on the major nearshore marine waters, lagoons, barrier islands, and coastal islands between May 15 and November 1, or when sea ice edge is 10 miles distant or greater from the coast each season if it occurs later than November 1.

For lease stipulations, all exception requests, including TL and one-time NSO exceptions, would be coordinated between the BLM Authorized Officer and the USFWS. Exceptions may be granted if the operator can demonstrate: (1) there are no practical alternatives to accessing subsurface resources; (2) the proposed action would maintain resource functions; and (3) the proposed action complies with other applicable laws. ROPs would be similar to Alternative D while requiring additional coordination with USFWS and local traditional knowledge holders. ROP 9 would provide greater protections applicable to all water use to minimize adverse impacts on fish, their habitat, and their availability for subsistence uses. ROP 11 would require on-site monitoring of streamflow prior to installing ice or snow bridges to determine the site-specific natural flow regime during the spring. ROP 15 would prohibit snow fences within 5 miles of the coast.

Alternative Summary Data

**Table 3-21
Water Resources within the Program Area**

Area of Lakes and Ponds in Acres by Alternative and Leasing Stipulation				
Parameter	Alternative B	Alternative C	Alternative D	Alternative D2
Not offered for lease sale	0	3,400	5,700	12,200
Available for lease sale, subject to no surface occupancy	5,900	15,500	15,600	9,300
Available for lease sale, subject to controlled surface use	0	800	200	300
Available for lease sale, subject to standard terms and conditions	11,300	2,300	400	200
Available for lease sale, subject to timing limitations	4,700	0	0	0
Total	21,900	22,000	21,900	22,000
Length of Rivers and Streams in Miles by Alternative and Leasing Stipulation				
Parameter	Alternative B	Alternative C	Alternative D	Alternative D2
Not offered for lease sale	0	1,270	1,920	2,580
Available for lease sale, subject to no surface occupancy	1,180	1,690	1,630	640
Available for lease sale, subject to controlled surface use	0	270	0	200
Available for lease sale, subject to standard terms and conditions	1,270	330	10	140
Available for lease sale, subject to timing limitations	1,100	0	0	10
Total	3,550	3,560	3,560	3,560

3. Environmental Consequences (Water Resources)

HUC8 Watershed Areas in Acres by Alternative and Leasing Stipulation				
Parameter	Alternative B	Alternative C	Alternative D	Alternative D2
Camden Bay				
Not offered for lease sale	0	342,300	489,700	781,600
Available for lease sale, subject to no surface occupancy	212,300	386,900	375,900	72,500
Available for lease sale, subject to controlled surface use	0	122,100	14,500	38,900
Available for lease sale, subject to standard terms and conditions	331,600	47,200	16,900	5,400
Available for lease sale, subject to timing limitations	0	0	1,500	100
Canning River				
Not offered for lease sale	0	7,300	33,100	64,800
Available for lease sale, subject to no surface occupancy	113,500	199,900	311,200	159,200
Available for lease sale, subject to controlled surface use	0	1,700	1,000	45,400
Available for lease sale, subject to standard terms and conditions	234,400	139,000	2,700	75,600
Available for lease sale, subject to timing limitations	0	0	0	3,000
Kongakut River-Beaufort Lagoon				
Not offered for lease sale	0	176,600	274,400	317,000
Available for lease sale, subject to no surface occupancy	32,100	121,500	39,300	0
Available for lease sale, subject to controlled surface use	0	0	400	0
Available for lease sale, subject to standard terms and conditions	54,000	18,900	2,500	0
Available for lease sale, subject to timing limitations	0	0	300	0

Source: USGS GIS, 2023

**Table 3-22
Potential Ice Road Extent (acres) by Alternative, Hydrocarbon Potential, and Leasing Stipulation**

Potential Ice Road Extent in Acres by Alternative, Hydrocarbon Potential, and Leasing Stipulation								
Hydrocarbon Potential and Leasing Stipulation	Alternative B		Alternative C		Alternative D		Alternative D2	
	Ice road extent	% Total area of lease stipulation	Ice road extent	% Total area of lease stipulation	Ice road extent	% Total area of lease stipulation	Ice road extent	% Total area of lease stipulation
High oil potential								
Not offered for lease sale	0	0%	7,300	100%	31,600	96%	20,800	
Available for lease sale, subject to no surface occupancy	92,800	66%	158,600	62%	222,200	57%	145,400	
Available for lease sale, subject to controlled surface use	0	0%	31,900	98%	1,300	100%	47,200	
Available for lease sale, subject to standard terms and conditions	165,100	58%	60,200	46%	2,800	88%	43,300	
Available for lease sale, subject to timing limitations	0	0%	0	0%	100	100%	1,400	
Medium oil potential								
Not offered for lease sale	0	0%	5,200	4%	11,000	4%	24,800	
Available for lease sale, subject to no surface occupancy	5,400	4%	13,400	3%	11,600	3%	0	0%
Available for lease sale, subject to controlled surface use	0	0%	1,600	2%	200	1%	0	0%
Available for lease sale, subject to standard terms and conditions	10,900	4%	4,600	6%	2,000	11%	0	0%
Available for lease sale, subject to timing limitations	8,500	3%	0	0%	0	0%	0	0%
Low oil potential								
Not offered for lease sale	0	0%	500	0%	500	0%	500	
Available for lease sale, subject to no surface occupancy	500	1%	0	0%	0	0%	0	0%
Available for lease sale, subject to controlled surface use	0	0%	0	0%	0	0%	0	0%
Available for lease sale, subject to standard terms and conditions	0	0%	0	0%	0	0%	0	0%
Available for lease sale, subject to timing limitations	0	0%	0	0%	0	0%	0	0%

Source: BLM and USFWS GIS 2022, Traiwicki 1994
 Note: Table assumes water withdrawn from available sources.

**Table 3-23
Snow Depth (>0.3 feet) and coverage by Alternative, Hydrocarbon Potential, and Leasing Stipulation**

Snow depth (>0.3 feet) and coverage by Alternative, Hydrocarbon Potential, and Leasing Stipulation								
Hydrocarbon Potential and Leasing Stipulation	Alternative B		Alternative C		Alternative D		Alternative D2	
	Weighted Average Snow Depth (feet)	Coverage Area (acre)	Weighted Average Snow Depth (feet)	Coverage Area (acre)	Weighted Average Snow Depth (feet)	Coverage Area (acre)	Weighted Average Snow Depth (feet)	Coverage Area (acre)
High oil potential								
Not offered for lease sale	-	-	0.329	7,300	0.328	32,800		23,500
Available for lease sale, subject to no surface occupancy	0.331	99,600	0.331	200,400	0.335	334,900		180,400
Available for lease sale, subject to controlled surface use	-	-	0.330	32,400	0.300	1,300		84,300
Available for lease sale, subject to standard terms and conditions	0.335	272,300	0.340	131,800	0.316	2,900		80,600
Available for lease sale, subject to timing limitations	-	-	-	-	0.320	100		3,100
Medium oil potential								
Not offered for lease sale	-	-	0.320	119,500	0.321	273,600		614,600
Available for lease sale, subject to no surface occupancy	0.322	89,300	0.322	343,800	0.326	306,800	-	-
Available for lease sale, subject to controlled surface use	0.329	279,500	0.336	80,500	0.332	14,500	-	-
Available for lease sale, subject to standard terms and conditions	-	-	0.323	70,800	0.313	18,000	-	-
Available for lease sale, subject to timing limitations	0.319	245,800	-	-	0.317	1,700	-	-
Low oil potential								
Not offered for lease sale	-	-	0.329	391,700	0.332	463,900		463,900
Available for lease sale, subject to no surface occupancy	0.329	87,800	0.345	61,200	-	-	-	-
Available for lease sale, subject to controlled surface use	-	-	0.347	11,000	-	-	-	-
Available for lease sale, subject to standard terms and conditions	0.349	44,600	-	-	-	-	-	-
Available for lease sale, subject to timing limitations	0.334	331,600	-	-	-	-	-	-

Source: BLM and USFWS GIS 2022, NOAA GIS 2020

Transboundary Impacts

It is not envisioned that any potential oil and gas activities within the program area would impact water resources quantity or quality across the international boundary other than potential spills in the coastal zone.

Cumulative Impacts

The geographic area relevant for assessing cumulative impacts for water resources is the program area. Limited past oil exploration actions, consisting of an exploration well drilled in 1985-1986 and a two-dimensional seismic survey conducted from 1984 to 1986, have occurred in the program area (**Appendix C**). These activities have contributed to the likelihood that future oil exploration and development activities could impact water resources in the program area. It is likely that past, present, and reasonably foreseeable future oil and gas activities in the Prudhoe Bay area may increase the quality and quantity of infrastructure that would make oil and gas development in the program area more profitable or likely. This trend would result in additive impacts to water resources. Alternative A would not contribute to cumulative impacts on water resources from oil and gas activities, as there would be no direct or indirect impacts associated with this alternative.

Similarly, it is likely that past, present, and reasonably foreseeable future development projects within the marine environment, including Point Thomson, Endicott, Liberty, and Northstar Development Project (**Appendix G**), may increase the feasibility of marine barging to support development in the program area and have an additive effect on impacts to water resources. Increasing barge traffic, port development, artificial island construction/fill, dredging, and infrastructure construction increases the likelihood of hazardous material spills, turbidity changes, and sedimentation and scour could impact marine water quality. Alternative A would not contribute to cumulative impacts on marine waters.

Future development of natural gas facilities, including a potential gas pipeline to Kaktovik to supplement or replace dependence on imported diesel and fuel oil or potential pipeline(s) to export North Slope gas, could result in future development of roads, pipelines, and gravel pads in the program area. Where practical, gas pipelines would likely be installed on the same VSMs as oil pipelines, reducing additive effects; however additional required gas compression equipment would require expanding fill at CPF pads. Two potential future development activities, the Alaska Stand Alone Pipeline and Alaska LNG Project, would increase the likelihood of future natural gas development in the program area. Natural gas development would result in additive impacts on surface water quantity and quality and permafrost thaw associated with Alternatives B, C, D, and D2.

Regional boat traffic on marine and fresh waterbodies associated with the maintenance and development of coastal communities, oil and gas activities, subsistence use, research, and recreation are expected to stay at current levels or increase along current trends (**Appendix G**), with additive impacts on water quality associated with spills and bank erosion. These cumulative impacts would continue for all alternatives, including Alternative A.

All alternatives, including Alternative A, would have additive impacts associated with climate change. These would include permafrost thaw, changes in surface water quantity and quality, changes in groundwater availability and quality, and changes in seasonal sea ice extent and duration.

3.2.11 Solid and Hazardous Waste

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts to the environment because by itself a lease does not authorize any on the ground oil and gas activities. However, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further

environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on solid and hazardous materials from on-the-ground activities.

Potential impacts from the future development and operation of facilities identified in hypothetical development scenarios (**Appendix C**) and include the generation of solid waste, wastewater, produced fluids, drilling muds, fire-fighting foams, and spills of oil, saltwater, and hazardous substances. Analysis of these impacts is tiered from information contained in the GMT2 Final SEIS (BLM 2018a), and the NPR-A IAP/EIS (BLM 2020d). Updated information from the ADEC spills database was used to supplement the analysis below.

Spills can originate from pipelines, storage tanks, production facilities and infrastructure, drilling rigs, heavy equipment or vehicles, and marine transport of supplies. Impacts from spills vary, based on material type, size, and season. For this analysis, the materials that could be spilled associated with oil and gas activities are categorized and described as follows:

- Produced fluids are composed of crude oil, natural gas, and brine and formation sand.
- Crude oil is oil separated from the brine, natural gas, formation sand, and other impurities and would be transported in the proposed pipeline.
- Refined oil is Arctic diesel, Jet-A 50, unleaded gasoline, hydraulic fluid, transmission oil, lubricating oil and grease, waste oil, mineral oil, and other products.
- Saltwater is treated water from the STP.
- Other hazardous materials are methanol, propylene and ethylene glycol (antifreeze), water soluble chemicals, corrosion inhibitor, scale inhibitor, fire-fighting foam (aqueous film forming foam), drag reducing agent (e.g., DRA Flo XL), and biocides.
- Potential poly- and perfluoroalkyl substances may be found in hydraulic fluids and fire-fighting foams.

Spill impact quantities are categorized and described as follows (taken from BLM 2004, Section 4.3.2.3):

- Very small spills, less than 0.24 barrels (10 gallons)
- Small spills, 0.24 to 2.37 barrels (10 to 99.5 gallons)
- Medium spills, 2.38 to 23.7 barrels (100 to 999.5 gallons)
- Large spills, 23.8 to 2,380 barrels (1,000 to 100,000 gallons)
- Very large spills, greater than 2,380 barrels (100,000 gallons)

Based on the GMT2 Final SEIS (BLM 2018a, Section 4.5.2.1), more than half of North Slope (*all activities*) spills were less than 0.24 barrels (10 gallons) and approximately 98 percent of the total volume released resulted from spills larger than 2.37 barrels (99 gallons). Upon detection, spills have been contained and cleaned up, as required by federal, state, and NSB regulations (NRC 2003). ADEC recorded an annual average of nearly 380 spills between 1995 and 2022. During this same time period a total of 46 spills were greater than 238 barrels (10,000 gallons) and six were greater than 2,380 barrels (100,000 gallons) (see **Appendix J**).

Spills resulting from development and operation of facilities identified in the hypothetical development scenarios (**Appendix C**) would occur on or close to oil field infrastructure (BLM 2004, Section 4.3.2.3). Most North Slope industry spills have been contained on gravel pads and roadbeds (BLM 2020d, Section 4.2.2), and most spills that reach tundra have affected fewer than 5 acres (BLM and MMS 1998). Natural or

anthropogenic-assisted restoration from these spills has generally occurred within a few months to years (NRC 2003).

The season in which a spill occurs can dramatically influence its behavior, impacts, and the cleanup response actions (BLM 2004, Section 4.3.2.3). The active soil layer in the program area ranges from less than 1 foot to 5 feet and is on average 2 feet thick; it consists of poorly drained, unconsolidated sediments, transected by fluvial deposits of rivers and streams. Dispersal of spilled materials would likely occur at or near the ground surface, as permafrost would likely inhibit infiltration of oil, saltwater, or hazardous substances. Permafrost is at least 1,000 feet thick, except in isolated areas of natural thaw near deep lakes, springs, or rivers and areas of thaw worsened by climate change and anthropogenic earth-disturbing activities. **Table 3-24** describes potential spill behavior during the four seasons and has been taken from the Alpine Satellite Development Plan EIS (BLM 2004).

Table 3-24
Spill Characteristics by Seasons

Season	Conditions ⁴	Description
Summer (ice-free)	Most rivers and creeks are ice-free or flowing; ponds and lakes have open water; tundra is snow-free; and biological use of tundra and water bodies is high. Open water in the Beaufort Sea.	Currents, winds, and passive spreading forces would disperse spills that reach the water bodies, including the sea. Spills to tundra would directly affect the vegetation, although dispersal of the spilled material is likely to be impeded by vegetation. Spills to wet tundra may float on water or be dispersed over a larger area than would spills on dry tundra or snow-covered tundra. Spills under pressure that spray into the air may be distributed downwind over substantial areas and affect the tundra vegetation and water bodies. Spills in flooded areas, especially flowing waters would distribute spilled materials to adjacent and/or distant terrestrial and tundra pond/lake habitats.
Fall (freeze-up)	Water bodies are beginning to ice over, but ice cover might vary, depending on temperature, wind, currents, and river flow velocities. Snow begins to cover tundra, and most migratory birds are leaving the North Slope.	Spilled material could be dispersed when it reaches flowing water but would slow or stop when it reaches snow or surface ice. Spilled material could be contained by snow or ice but dispersed if ice breaks up and moves before it refreezes. Spilled material also could flow into ice cracks to the underlying water, where it could collect.
Winter (ice cover)	Water bodies, including the Beaufort Sea, are covered by mostly unbroken ice, and snow covers the tundra.	Dispersal of material spilled to tundra generally would be slowed though not necessarily stopped by snow cover. Depending on the depth of snow cover as well as temperature and volume of spilled material, it may reach the underlying dormant vegetation or tundra ponds and lakes. Similarly, spills to rivers and creeks generally would be restricted in distribution by snow and ice covering the water body, compared to seasons when there is no snow or ice cover. Spills under the ice to creeks, rivers, and tundra ponds and lakes might disperse slowly, as the currents are generally slow to nonexistent in winter. Barge transports would not occur during winter.

⁴Beaufort Sea characteristics are based on two seasons summer (July to September) and winter (October to June)

Season	Conditions ⁴	Description
Spring (breakup)	This is a short period of the year. Thawing begins in the higher foothills of the Brooks Range and river flows increase substantially and quickly, often to flood stages. These increased flows cause river ice cover to break up and flow downriver. River floodwaters usually flow over sea ice, which hastens breakup of sea ice. Snow cover begins to melt off tundra and many migratory species, especially birds, return to the tundra.	Spills to water bodies during breakup are likely to be widely dispersed and difficult to contain or clean up. Spills to the tundra might be widely dispersed if flooding overtops river and creek banks and entrains the spilled material. Spills in flooded areas, especially flowing waters would distribute spilled materials to adjacent and/or distant terrestrial and tundra pond/lake habitats.

The rate of potential oil, saltwater, and hazardous substance spills from the hypothetical development scenario (**Appendix C**) assumes spill rates would be similar as those in the NPR-A for oil exploration, development, production, and transportation activities. See **Section 3.2.6**, Petroleum Resources, for a further discussion on rate of crude oil spills under the hypothetical development scenario. The combination of federal and state regulations, continually improving industry operating practices, and advancements in best available control technology reduce the probability and size of future spills (BLM 2004, Section 4.3.1).

Alternative A

Under Alternative A, current management actions would be maintained, as described in the Arctic Refuge CCP (USFWS 2015a). There would be no generation of solid waste, wastewater, or spills of oil, saltwater, or hazardous substances in the Coastal Plain associated with future oil and gas activities under Alternative A.

Impacts Common to All Action Alternatives

The hypothetical development scenario (**Appendix C**) identifies development activities in the program area and the potential timing of these activities that would require the management of solid waste, wastewater, and hazardous waste.

All action alternatives would generate solid waste, consisting of food wastes, sewage sludge, fire-fighting foam, and other nonhazardous burnable and unburnable wastes from future oil and gas exploration, development, production, abandonment and reclamation. Solid wastes would be separated and stored in large trash receptacles or approved containers, as part of the CPF, until they are incinerated or transported to an approved landfill outside the Coastal Plain, such as the landfill near Prudhoe Bay. Wastes that cannot be incinerated would be transported to approved offsite landfills. See ROPs 1 and 2 for further details on the handling and disposal of solid and hazardous waste. Burning waste would temporarily affect air quality.

Use of injection wells (Class I or Class II) in the future would be used to dispose of wastewater, produced water, spent fluids, and chemicals, as approved by the EPA, the AOGCC, or ADEC. Injection wells would be used to dispose of wastewater generated from the estimated field use of 2 million gallons per day. As a result, injection of wastewater reduces potential impacts on surface waters or the land by injecting wastewater deep underground into zones isolated from drinking water sources. See Lease Stipulation 3 for further details on studies required prior to use of injection wells.

The potential occurrence of spills does not depend on any alternative chosen, as spills are not a planned activity and are unpredictable in cause, location, size, time, duration, and material type (Mach et al. 2000). **Table 3-25**, taken from the NPR-A IAP/EIS (BLM 2020d, Appendix I), provides the spill rate based on substance spilled and size of spill. **Table 3-26**, taken from NPR-A IAP/EIS (BLM 2020d, Appendix I), provides the average spill size in gallons for size of substance spilled. See **Section 3.2.6**, Petroleum Resources, for a further discussion on rate of crude oil spills under the hypothetical development scenario.

Table 3-25
North Slope Spill Rates by Substance and Size per Billion Barrels of Oil Produced (2000-2018)

Substance	Spill Size			Total Gallons
	Small (0 to 2,100 gallons)	Medium (2,101 to 36,036 gallons)	Large (greater than 36,036 gallons)	
Crude Oil	129.53	2.63	0.20	132.36
Refined Oil	563.37	1.41	0.00	564.79
Seawater and Produced Water	94.57	8.08	1.41	104.07
Other Hazardous Materials	386.16	3.23	0.20	389.59
Total	1,173.62	15.36	1.82	1,190.80

Source: ADEC 2020

Note: Totals do not match due to rounding

Table 3-26
Average North Slope Spill Size in Gallons (2000-2018)

Substance	Small	Medium	Large
Crude Oil	60	9,893	212,252
Refined Oil	24	3,269	0
Seawater and Produced Water	207	6,854	88,981
Other Hazardous Materials	63	5,341	42,000

Source: BLM 2020d

Likewise, the potential discharge of hydraulic fluids or fire-fighting foams containing poly- and perfluoroalkyl substances does not depend on any alternative chosen. ROP 2 requires the implementation of a comprehensive waste management plan, to identify procedures to contain, treat, and properly dispose of all runoff, wastewater if a spill or release occurs of poly- and perfluoroalkyl substances.

Alternative B

Potential impacts from solid and hazardous waste from oil and gas activities under Alternative B would have the highest potential of encountering existing contamination. This alternative anticipates the greatest acreage of surface disturbance for leasing and infrastructure development with the fewest limitations on the location of surface disturbance. Potential areas where surface disturbance may occur contain 14 ADEC contaminated sites. Estimated hazardous material spills associated with total recovery estimates under Alternative B could be up to 2,230 spills for spills less than 2,100 gallons in size and up to 33 spills for spills greater than 2,100 gallons in size. Assuming a 70-year period of production, spills less than or equal to 2,100 gallons could occur annually up to 32 spills and for spills greater than 2,100 gallons could occur annually up to 0.5 spills.

Alternative C

Potential impacts from solid and hazardous waste from oil and gas activities under Alternative C anticipates approximately 1,464 acres of surface disturbance with greater limitations on areas where leasing and infrastructure development may occur. Potential areas where surface disturbance may occur contain no ADEC contaminated sites. Estimated hazardous material spills associated with total recovery estimates under Alternative C could be up to 1,643 spills for spills less than 2,100 gallons in size and up to 24 spills for spills greater than 2,100 gallons in size. Assuming a 70-year period of production, spills less than or equal to 2,100 gallons could occur annually up to 23 spills and for spills greater than 2,100 gallons could occur annually up to 0.3 spills.

Alternative D

Potential impacts from solid and hazardous waste from oil and gas activities under Alternative D would be similar to those identified in Alternative C. This alternative anticipates approximately 1,040-acre surface disturbance with greater restrictions on areas available for leasing and infrastructure development compared to Alternatives B and C. Potential areas where surface disturbance may occur contain no ADEC contaminated sites.

Additional protections would be added through modification to ROP 1 and 2. ROP 1 would include requirements for the proper storage of solid waste and industry-derived trash while on-site or it would be removed from the area. ROP 2 would include the requirement to encourage procedures, processes, and establish an environmental culture, which foster improvement of environmental stewardship. ROP 2 also provides additional recommendations on handling of human waste.

Estimated hazardous material spills associated with total recovery estimates under Alternative D could be up to 587 spills for spills less than 2,100 gallons in size and up to 9 spills for spills greater than 2,100 gallons in size. Assuming a 70-year period of production, spills less than or equal to 2,100 gallons could occur annually up to 8 spills and for spills greater than 2,100 gallons could occur annually up to 0.1 spills.

Alternative D2

Potential impacts from solid and hazardous waste from oil and gas activities under Alternative D2 would be similar to those identified in Alternative D. This alternative anticipates approximately 995 acres surface disturbance as it includes the most restrictions on areas available for leasing and infrastructure development. Potential areas where surface disturbance may occur contain no ADEC contaminated sites.

Transboundary Impacts

There would be no direct or indirect transboundary impacts associated with solid and hazardous waste other than potential spills occurring in the coastal zone.

Cumulative Impacts

Cumulative impacts include the existing 43 spills of approximately 459.3 barrels (19,290 gallons) of oils, saltwater, or hazardous substances near the developed areas of Kaktovik, and potential spills from the hypothetical development scenario. Over half of documented spills associated with oil and gas operations are less than 10 gallons (BLM 2004), and detected spills are promptly contained and cleaned up to federal, state, and borough regulations (NRC 2003). Because there are no direct or indirect impacts on solid and hazardous wastes associated with Alternative A, no contribution to cumulative impacts would occur.

3.3 BIOLOGICAL RESOURCES

3.3.1 Vegetation and Wetlands

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself, a lease does not authorize any on the ground activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and lease stipulations. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect leasing impacts. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, this analysis considers potential impacts on vegetation and wetlands from on-the-ground activities.

Potential impacts on vegetation and wetlands were evaluated for all areas available for development under each alternative, as identified in **Table 2-2** in **Chapter 2** and **Tables K-3, K-4, K-6 and K-7** in **Appendix K**. The quantification of potential impacts on specific vegetation and wetland types using a geographically explicit project footprint (the typical scenario for a proposed development) was not possible for this EIS because no on-the-ground actions have been authorized. Instead, hypothetical impacts were estimated based on the proportions of vegetation and wetland classes occurring in the program area, adjusted for the surface impact limits of each alternative.

The hypothetical direct footprint for one anchor development oil field (consisting of a CPF, roads connecting to six satellite drill pads, a STP pad, and a 30-mile access road) was estimated at approximately 750 acres (as shown in **Appendix C, Figure C-1**). The anchor development footprint was buffered by 328 feet, based on existing literature on the extent of fugitive dust deposition on Arctic tundra (Walker and Everett 1987). The 328-foot indirect effects buffer encompasses an additional 6,607 acres (an approximately 1 to 8.8 ratio for direct effects to indirect effects). While some limited indirect effects may occur beyond the 328-foot buffer, this width was chosen because the best available data suggest that most measurable effects would occur in this zone.

The analysis associated with this assessment is limited by the following factors:

- The RFD provides estimated acreages per impact type for a typical anchor development; however, it was not located at specific locations, so a comparison of specific vegetation and wetland types under the alternatives is not possible.
- Much of the scientific literature conducted on impacts of oil and gas development are from the Beaufort Coastal Plain and the National Petroleum Reserve in Alaska (NPR-A). These areas have a wetter ecological regime with numerous thaw lakes, interspersed with wet meadows and marshes. The program area has some limited lowlands near the coast and in the larger river deltas but most of the area is composed of mesic and tussock tundra on gently rolling terrain.

Considering these limitations, the following analysis is constrained to evaluating total acres of vegetation types and wetlands within land use categories. This Supplemental EIS assumes the total disturbance estimates for each action alternative would be reached (e.g., 2,000 acres under Alternative B) and the impacts of each alternative on vegetation and wetlands type would be proportional to their occurrence in the analysis area. An additional, location-specific evaluation would be necessary, using higher resolution mapping, before any proposed development project could be approved for development.

The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, no federal minerals in the program area would be offered for future oil and gas lease sales. Current management actions would be maintained, and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). There would be no direct or indirect impacts on vegetation or wetlands from oil and gas activities under Alternative A.

Impacts Common to All Action Alternatives

Under the revised range of alternatives and RFD scenario analyzed in this Supplemental EIS, seismic exploration would now be limited to only those areas available for lease under each action alternative (**Section 2.2, Alternatives Development**), thus reducing the areas where seismic exploration could occur under

Alternatives C and D (versus the 2019 EIS range of alternatives). Geophysical exploration could occur on a lease-by-lease basis and additional NEPA analysis would be required for any proposed work. Future seismic exploration would occur during winter. Direct surface impacts would occur in a grid pattern from heavy, tracked, seismic vibrator vehicles driven directly over the snow-covered tundra (see **Appendix C, Section C.7.2**). Multiple vehicles may be used simultaneously miles apart to conduct vibroseis exploration, or convoys of four to five trucks could travel in a line, although this is less common. Seismic operations would be accompanied by ski-mounted camp buildings towed by bulldozers or other tracked equipment. Operations could include two to three strings with four to eight modular buildings in each string; camps are assumed to move weekly. Impacts from seismic exploration are visible in a systematic grid pattern on the tundra surface and impacts on vegetation and wetlands include changes in plant community composition and structure, altered hydrology, compacted soil, and direct damage to aboveground structures such as tussocks or woody stems and branches (Jorgenson et al. 2010; Walker et al. 2019; Raynolds et al. 2020).

Long-term studies have shown that the overall long-term impact of seismic vehicle traffic on tundra is low, but in some cases, impacts can still be measured up to 33 years after exploration (Raynolds et al. 2020). Seismic vibrator lines and camp train trails on the North Slope may be visible for many years following seismic data collection. During summer, they would appear as a grid of green tundra that supports a higher cover of graminoid species (i.e., herbaceous plants with a grass-like morphology) than the surrounding undisturbed tundra; in the winter, they would show as depressed troughs that accumulate snow in the microtopographic depressions created by the passage of heavy vehicles.

In all vegetation types, impacts on vegetation were most noticeable during the first 5 years after disturbance (Jorgenson 2010; Raynolds et al. 2020). Disturbance levels varied widely depending on snow cover and permafrost, site moisture, microtopography, and vegetation conditions. Moist and dry vegetation types including tussock tundra, shrub tundra, *Dryas* terraces, sedge-*Dryas* tundra, and moist sedge-willow tundra are susceptible to disturbance initially due to the presence of tussock-forming sedges and evergreen shrubs, both of which are easily damaged (Jorgenson 2018; Raynolds et al. 2020). These vegetation types correspond approximately to the following land cover classes as defined in this SEIS: ericaceous dwarf shrub, *Dryas* dwarf shrub, moist sedge-*Dryas* tundra, shrub-tussock tundra, tussock tundra, moist sedge-willow tundra, and moist sedge-shrub tundra with wet inclusions. Combined, these land cover classes account for approximately 65 percent of the program area (see **Appendix B, Table B 31**).

Riparian shrublands (land cover class: low and tall riverine shrub) are also subject to higher levels of initial impact because the tall deciduous shrubs in these communities extend above the snow surface. Mosses, particularly *Sphagnum* species and feather mosses (e.g., *Tomenthypnum nitens*) are also susceptible to damage and show poor recovery (Jorgenson et al. 2010). Wet sedge tundra (land cover classes: wet sedge meadow tundra and wet sedge tundra with moist inclusions) and sparsely vegetated areas were relatively unaffected by seismic trails.

Long-term damage was also most prevalent in moist and dry vegetation types, particularly moist sedge-willow tundra and moist sedge-*Dryas* tundra. These vegetation types occur mainly in ice-rich areas, where surface disturbance can lead to thawing and instability (Jorgenson 2018; Raynolds et al. 2020). The likelihood of long-term disturbance was considered moderate for other dry and moist tundra types, including tussock tundra. The potential for long-term disturbance was considered low for wet tundra and partially vegetated areas. Areas where the passage of heavy vehicles produces a deep microtopographic depression may show increasing disturbance in the form of thermokarst features that may never recover (Jorgenson et al. 2003a; Jorgenson et al. 2010).

Potential effects on vegetation and wetlands from seismic operations are prevented or mitigated through ROP 11, 12, and 15 (**Table 2-3**). These procedures reduce impacts by limiting surveys to the winter, when ground temperatures are below 23°F, using low ground pressure vehicles, prohibiting bulldozing tundra mat and vegetation, making only single passes, planning the seismic paths to vegetation types that are least sensitive, and providing monitoring follow-up with interested agencies.

Studies on BMPs for winter off-road vehicle traffic suggest that impacts could be mitigated by using vehicles that exert fewer pounds per square inch and performing seismic operations later in the winter when there is more snow cover and soils are frozen deeper (Bader and Guimond 2004; Bader 2005).

The effects of seismic exploration may be difficult to eliminate completely, in part because the program area is in a region of overall low snow accumulation. (Walker et al. 2019; Reynolds et al. 2020). While impacts on sensitive vegetation types can be limited with planning, tussock tundra and shrub tussock tundra (saturated emergent meadow and saturated shrub scrub wetland classes) are prevalent in the area and cannot be entirely avoided. Overall, seismic exploration impacts on the program area have the potential to be measurable and sustained or even worsen over the long term.

According to a long-term study on the effects of ice road construction and operation in the NPR-A, ice roads cause measurable damage to the vegetation in the short term (0 to 5 years) but would recover to pre-construction conditions after approximately 20 years. Similar to seismic train impacts, ice roads disturb the drier, shrub-dominated vegetation types (e.g., moist sedge-willow tundra, tussock tundra, shrub tussock tundra, *Dryas* dwarf shrub, ericaceous dwarf shrub, low and dwarf birch shrub) to a greater degree than wetter graminoid-dominated communities (e.g., wet sedge meadow tundra, freshwater marsh). The most sensitive wetland types to ice road disturbances include saturated shrub and emergent types and the least susceptible to lasting damage are flooded emergent meadows. The damage was found to be due to the freezing of plant tissues in ice, in those species not adapted to inundation in water and then ice during winter, as well as the clipping of high microsites, such as raised tussocks that form in tussock tundra or shrub branches in low shrub vegetation types (Guyer and Keating 2005).

Compaction of the soil and surface organic layers is also a potential effect of ice-road construction. BMPs to reduce impacts include building ice roads along the wettest routes, avoiding the clipping of vegetation above the ice surface, and avoiding multi-season ice road construction along the same path.

The primary impact on vegetation and wetland types from construction (development) is the permanent loss of those types due to the placement of gravel fill for the construction of roads and pads, installation of VSMs for pipeline footings, and gravel excavation, which triggers permitting and mitigation requirements under the CWA. The removal of surface layers for gravel extraction would also result in the permanent loss of vegetation and wetlands. No vegetation or wetland types are more or less vulnerable to gravel fill, but road and pad siting would be preferentially located in drier vegetation types such as tussock tundra, moist sedge-willow tundra, moist sedge-*Dryas* tundra, *Dryas* dwarf shrub, and ericaceous dwarf shrub. Some of the drier landcover types correspond to non-jurisdictional uplands and saturated emergent and shrub wetlands. Ice roads and pads would also continue to be used during the construction phase to transport and stockpile materials. The effects of ice roads and pads would be the same as described above.

During construction, vegetation and wetland plant community composition can be altered through the deposition of dust and gravel spray from vehicle traffic, alterations to drainage patterns from drifted snow, impounded drainages, the potential for introduction of invasive or noxious nonnative plants, and the potential for oil, water, and drilling mud spills to the tundra surface (see **Section 3.2.11** for a discussion of spills). Dust

fallout due to traffic on gravel road surfaces has been shown to occur up to 328 feet from the edge of the roadway (Myers-Smith et al. 2006). Dust particles may reduce plant growth by smothering the vegetation and may reduce wetland function by introducing pollutants and damaging or altering the plant community composition.

Gravel roads and pads tend to increase the occurrence of thermokarst next to the footprint edge, with ponded areas extending into the adjacent tundra and altering the vegetation and wetland plant community structure (Raynolds et al. 2014; Kanevskiy et al. 2022). Ponding also may occur if existing subsurface drainage is impeded at the edges of roads or if changes to patterns of snow drifting increases meltwater.

Invasive species infestations are a growing threat to the relatively pristine vegetation and wetland types on the North Slope and in the program area. Gravel sources and vehicle tracks contaminated with invasive plant propagules have been shown to be the most likely way for invasive plants to be dispersed (ROP 43) (Carlson and Shephard 2007). If invasive species were to establish in the program area, control methods would follow the Department of Interior's Integrated Pest Management Policy (517 DM 1, DOI 2007), which includes provisions to minimize impacts on non-target species.

Gravel mining on the North Slope results in an open pit that gradually fills with water. Excavation would result in the permanent loss of existing vegetation and wetland types and would trigger wetland permitting and compensatory mitigation.

Due to continuous permafrost, pipelines are typically constructed aboveground, which introduces the potential for damage due to oil spills and less severe long-term effects of shading and snow accumulation on vegetation and wetlands below the pipeline. Spill effects would range in severity and impacts would be evaluated on a case-by-case basis. Lease Stipulations 4 and 9 require operators to develop adequate spill response plans before construction begins.

Little to no data are available on the effects of pipeline shading and snow drifting on vegetation and wetlands. Pullman and Lawhead (2002) evaluated the effect of snow drifting on wildlife passage and concluded that the snow drifts were not continuous and were related to the orientation of the pipeline with respect to prevailing winds; however, snow drifts do accumulate, and shading would be present throughout the year, providing late thaw in the spring and cooler temperatures throughout the growing season. Changes to the vegetation communities could be expected due to cooler soil temperatures and a decreased active layer thickness.

Impacts during future project operations (production) typically would include all the effects described for construction, except for the placement of fill and gravel extraction. In addition to preservation, avoidance, and minimization measures taken in advance of project initiation, proponents would prepare an abandonment and reclamation plan to comply with ROP 35 and the CWA, Section 404(b)(1). The reclamation plan under ROP 35 would address recovery efforts for filled and excavated areas with the goal to partially remove gravel fill and reestablish surface organics and hydrology.

Through a combination of gravel removal, fertilization, and sometimes seeding, most vegetated surfaces can be returned to a functioning community within 10 to 15 years from the beginning of the reclamation project (Kidd et al. 2006). Long-term studies show that, while a self-sustaining plant community can be created that provides specific ecosystem function, the structure is still not equivalent to the surrounding undisturbed tundra 30 or more years after revegetation (Kearns et al. 2015; Jorgenson et al. 2003b).

Much of the available research to date is in the active oil field near Prudhoe Bay, which generally has a much wetter hydrologic regime than much of the program area; however, the principal challenges in that area relate

to the presence of continuous permafrost and slow recolonization. The most difficult problem with disturbances caused by the placement of fill is preventing subsidence when gravel is removed. If subsidence cannot be stabilized, thermokarst may continue to worsen and the site may never recover (Kidd et al. 2006). Disturbances associated with the placement of gravel fill and excavation may be unavoidable, and they represent significant impacts on sensitive wetland and tundra vegetation in the long term, even after rehabilitation.

The available rare plants data are not sufficient to determine the range of individual species across the program area, nor are the mapping data sufficient for identifying species-specific habitats. ROP 44 would require that proposed developments in areas that provide suitable habitat for BLM sensitive plant species be surveyed by the project proponent to detect the presence of sensitive species, and the results of the survey would be used in project planning to minimize impacts to BLM sensitive species. Impacts on monitored rare plant populations may potentially occur under all action alternatives. An isolated rare plant population or rarely occurring habitat is one that would be at risk for loss or degradation. Updated mapping and risk analysis would be required for future proposed projects to ensure avoidance measures are taken.

Species- and location-specific data on invasive plants in the program area are not available. This SEIS assumes each action alternative would have similar exploration, construction, and operations methods and the area of the anchor development would be the same, so there is an equal chance of new infestation across all action alternatives.

According to the ecological risk analysis conducted by Carlson et al. (2015), none of the documented species listed in *Affected Environment* (**Appendix B**) are regarded as a significant ecological threat. The species with the greatest ecological risk is thought to be *Hordeum jubatum*, which may be an Alaska native plant that was not found on the North Slope prior to oil development. It has been spreading rapidly throughout the state over recent decades in straw and agricultural seed (Carlson et al. 2015). *H. jubatum* is a salt-tolerant species with extreme cold tolerance and it is capable of invading a range of Coastal Plain ecosystems, including coastal-influenced plant communities. It thus has some potential to spread along with development in the program area.

The aquatic invasive species *Elodea canadensis* could invade freshwater inland lakes in the program area with increased water-based air traffic in the area. Once established, *Elodea* can alter the waterflow patterns, increase turbidity and pH of the water, and accumulate nutrients while reducing availability in the substrate (ACCS 2018c). Due to the remoteness of the program area, *Elodea* infestations would be difficult to detect until it is well established; moreover, eradication is cost prohibitive and ineffective (Carey et al. 2016). ROP 43 is designed to prevent the introduction or spread of nonnative invasive species within the Coastal Plain.

The lease stipulations and ROPs as described in relation to specific impacts above would help avoid or minimize some direct and indirect effects from potential development in lease areas. However, unavoidable impacts to Waters of the United States are likely to occur given that the majority of the program area is comprised of wetlands. Compensatory mitigation may be required by USACE during the Clean Water Act Section 404 permitting process (for the placement of fill into wetlands) for a proposed project and this could also satisfy preservation requirements under the USFWS Mitigation Policy and EO 11990.

Alternative B

Under Alternative B the entire program area would be available for lease sale with NSO stipulations applied to most riparian corridors and estuaries and TL applied to caribou calving grounds. No areas would be designated with CSU or No Sale stipulations. The most common landcover types impacted under TL and STC

would be moist sedge-shrub tundra with wet inclusions and tussock tundra. Lands designated as NSO comprise 24.8 percent water and 14.3 percent wet sedge meadow tundra (**Table K-3 in Appendix K**). The most common wetland class impacted under all land-use categories would be seasonally flooded emergent meadow with 20.1, 33.3, and 32.2 percent of the total area within NSO, TL, and STC respectively (**Table K-6 in Appendix K**).

The NSO requirements under Alternative B would prohibit construction of permanent oil and gas facilities at stream or river crossings, unless it is unavoidable; thus, the disturbances mentioned under *Impacts Common to All Action Alternatives* would likely occur throughout the NSO/high HCP areas, but to a slightly lesser extent in these riparian areas than in the STC or TL areas. Vegetation and wetland types most likely to occur in riparian areas would be a higher proportion of wetter types, such as wet sedge meadow tundra vegetation types and seasonally flooded emergent wetlands. Wetter or seasonally flooded vegetation types tend to provide important wildlife habitat function, as noted above; thus, the NSO protections would preferentially preserve some high functioning wetlands from impacts associated with road and pad construction in limited riparian areas.

The vegetation type distribution in TL and STC areas under Alternative B closely match the proportion of vegetation types throughout the entire program area (**Tables K-3 and K-4 in Appendix K**) and overall may be preferable for construction of gravel roads and pads. This is because they are dominated by drier types, such as tussock tundra, low shrub, wetlands with saturated hydrologic regimes and non-jurisdictional uplands. The TL area (comprising inland areas of caribou calving and post-calving habitat) has the highest proportion of low and dwarf birch shrub (4.7 percent versus 2.1 percent in STC and 1.4 percent in NSO land-use areas open for leasing; **Table K-3 in Appendix K**). The percentage of low shrub and potential uplands in this inland area is higher than the overall proportion in the full program area.

The lease stipulations in the TL areas restrict construction between May 20 and July 20 to reduce disturbance to calving and post-calving caribou. However, this restriction would not preserve vulnerable vegetation or wetland types because construction would be permitted in these areas outside the TL period and would still affect vegetation and wetlands. Because of the higher incidence of low shrub vegetation and uplands or saturated wetlands in the central and eastern portion of the program area, potential winter seismic and ice road impacts, as described under *Impacts Common to All Action Alternatives* above, would likely be more pronounced in the TL area under Alternative B.

The estimated surface development under Alternative B would allow for 2,000 acres of development. Using the hypothetical direct footprint for one anchor development (as described in *Direct and Indirect Impacts* above), the 2,000 acres of gravel infrastructure would result in approximately 17,600 acres of indirect impacts from dust deposition (based on the 328-foot dust dispersion buffer). Under the maximum development scenario for Alternative B, the most affected land cover types would be tussock tundra, shrub tussock tundra and moist sedge-shrub tundra with wet inclusions; direct and indirect impacts on these types would total 4,297, 2,555 and 3,663 acres respectively (**Table K-4 in Appendix K**). Similarly, the most affected broadscale wetland types would be seasonally flooded emergent meadow, saturated emergent meadow, and flooded emergent meadow, with total direct and indirect impacts estimated at 5,852, 3,986, and 3,445, acres respectively (**Table K-7 in Appendix K**). These commonly impacted landcover and wetland types, which occur primarily in the southeast portion of the program area, are relatively dry and are characterized by tussock-forming sedges and low shrubs. These drier landcover types are most suitable for construction and also most vulnerable to impacts from seismic exploration and ice roads.

Alternative C

Under Alternative C, a total of 526,300 acres of caribou calving grounds and spring aufeis areas would be designated as not available for lease sale which would reduce the potential for direct and indirect impacts on vegetation and wetlands by 34 percent in comparison to Alternative B. The most common vegetation and wetland types in the areas not available for lease sale would be tussock tundra and seasonally flooded emergent meadow, encompassing 22.9 and 29.5 percent of the land-use area respectively (**Tables K-3 and K-6 in Appendix K**). NSO stipulations would limit most surface disturbance within selected riparian corridors and would be expanded to include Canning Delta and Lakes as well as the nearshore marine zone, which is approximately 22 percent greater than NSO under Alternative B. The most common vegetation type under NSO stipulations would be tussock tundra encompassing 16.2 percent of the land-use area and the most common wetland type is seasonally flooded emergent meadow (26.3 percent), which most commonly represents wetlands subject to seasonal overbank flooding within riparian corridors. The areas under Alternative C that would be open for lease sale under STC only are non-riparian areas directly to the east of the Canning River corridor where the most common vegetation types are moist sedge-shrub tundra with wet inclusions (27.6 percent of STC area) and tussock tundra (26.9 percent of STC area). The most common wetland type in the STC area would be seasonally flooded emergent meadow encompassing 41.8 percent of the STC area (**Tables K-3 and K-6 in Appendix K**).

As noted above, the most significant reduction in impacts on vegetation and wetlands would be the inclusion of areas designated as not available for lease sale for caribou calving and spring aufeis areas. The predominant vegetation type in the areas not available for lease sale under Alternative C would be tussock tundra (22.9 percent of land-use area), which corresponds to drier, better drained habitats in the southeast portions of the program area. As noted above in *Impacts Common to All Alternatives*, the drier vegetation and wetland types may be somewhat lower functioning across a range of typical wetland functions but are specifically more susceptible to degradation from both seismic exploration and ice road impacts. The mapping datasets used for the impacts analysis are not at a fine enough scale to highlight unique and rare vegetation and wetlands associated with the Sadlerochit, Fish Hole 1, Tamayariak, and Okerokavik springs. These springs have been identified as priority resources of concern for the Arctic NWR (USFWS 2021a). They are rare landscape features where the groundwater table is connected to the perched surface water above the permafrost layer which increases hydrologic wetland functions and supports increased plant biodiversity (**Map 2-4, Alternative C Stipulations, in Appendix A; Table K-3 in Appendix K**).

The total area that would be designated as NSO increases under Alternative C and is expanded to include the entire Canning River Delta, the broad floodplain of the Hulahula River, and an area of high-density lakes and ponds associated with the Canning River estuary (**Map 2-4, Alternative C Stipulations, in Appendix A**). Roads and bridges would still be permitted to cross waterbodies under the NSO stipulations, which would effectively reduce potential impacts on wetter vegetation and wetland types, including wet sedge-meadow tundra and riparian seasonally flooded emergent meadow. Wetter riparian habitats are typically considered wetlands with the highest functional value because of fish and wildlife habitat support and hydrologic function and are the least suitable for construction and placement of fill. Mitigation measures when designing water crossings would likely seek to minimize impacts on the highest value wetlands.

Lands that would be designated for CSU stipulations under Alternative C are intended to protect the Porcupine Caribou Herd post-calving habitat, which under Lease Stipulation 8, corresponds to construction and operation TLs in the area (**Map 2-4, Alternative C Stipulations, in Appendix A**). As noted above, TL land-use stipulations have very little effect in reducing impacts on vegetation and wetlands. Total estimated surface disturbance under Alternative C would allow for 1,464 acres of development. Using the hypothetical direct

footprint for one anchor development (as described in *Direct and Indirect Impacts* above), the estimated 1,464 acres of disturbance would result in approximately 12,883 acres of indirect impacts from dust deposition (based on the 328-foot dust dispersion buffer). The Alternative C indirect impacts would be 27 percent less than Alternative B.

Under the maximum development scenario for Alternative C, the most affected land cover types would be tussock tundra, shrub tussock tundra and moist sedge-shrub tundra with wet inclusions; direct and indirect impacts on these types would total 3,069, 1,485, and 2,871 acres respectively (**Table K-4** in **Appendix K**). Similarly, the most affected broadscale wetland types would be seasonally flooded emergent meadow, saturated emergent meadow, and flooded emergent meadow, with total direct and indirect impacts estimated at 4,305, 3,086, and 2,137 acres respectively (**Table K-7** in **Appendix K**). These commonly impacted landcover and wetland types occur primarily in the southeast portion of the program area and overlap the areas in Alternative C that are not available for leasing. These relatively dry areas, characterized by tussock-forming sedges and low shrubs, are most suitable for construction and also most vulnerable to impacts from seismic exploration and ice roads. The landcover type with the greatest reduction in impacts under Alternative C in comparison to Alternative B is tussock tundra, which corresponds roughly to seasonally flooded emergent meadow wetlands.

Alternative D

Under Alternative D, approximately 51 percent of the program area would be excluded from leasing, including the Porcupine Caribou Herd primary calving habitat area. Most of the remaining program area (726,300 acres) would be available for lease sale with NSO stipulations. CSU stipulations would apply to approximately 1 percent of the program area, while approximately 2 percent of the total program area would be available for lease sale under STC.

The areas not available for leasing primarily consist of tussock tundra (20.3 percent), moist sedge-shrub tundra with wet inclusions (19.0 percent), and shrub tussock tundra (17.9 percent). The most common landcover types impacted under NSO stipulations would be tussock tundra and moist sedge-shrub tundra with wet inclusions (24.2 percent and 16.2 percent, respectively). Within the area designated for CSU stipulations, the most common vegetation types would be moist sedge-shrub tundra with wet inclusions and tussock tundra (33.2 percent and 28.2 percent, respectively). The small area that would be available for leasing under STC primarily consists of moist wet sedge tundra with wet inclusions, which comprises 74.2 percent of the STC acres compared to 1 percent of the program area (**Table K-3** in **Appendix K**).

Within the areas not available for leasing, the most abundant wetland classes are seasonally flooded, flooded, and saturated emergent meadows (31.5 percent, 20.8 percent, and 19.9 percent, respectively). The most common wetland classes that would be under NSO stipulations are seasonally flooded emergent meadow, saturated emergent meadow, and flooded emergent meadow (28 percent, 22 percent, and 14 percent respectively). In the small area that would be under CSU stipulations, the most common wetland classes are seasonally flooded, flooded, and saturated emergent meadows (28.0 percent, 23.0 percent, and 28.0 percent, respectively). Within the limited area that would be available for leasing under STC, the most common wetland classes are seasonally flooded emergent meadow (60.0 percent) and flooded emergent meadow (29.0 percent). The proportions of the common wetland classes located within the areas not available for lease sale area are similar to their occurrences in the overall program area (**Table K-6** in **Appendix K**).

Within the area where lease sales would not occur, the proportions of tussock tundra and moist sedge-shrub tundra with wet inclusions are similar to those in the overall program area, while the percentage of shrub tussock tundra is slightly higher. Shrub communities, including low and tall riverine willow and low and

dwarf birch, although not abundant overall, occupy larger proportions of the area not available for lease sale compared to the program area as a whole. The rare poplar forest type, which occupies only 2 acres, occurs entirely within the not available for lease sale; thus, providing protection for some relatively uncommon vegetation types that may provide habitat value for wildlife.

The NSO requirements under Alternative D would prohibit construction of permanent oil and gas facilities in streambeds and within setback areas ranging from 0.25 to 4.0 miles in width; thus, direct impacts from the placement of gravel fill would be minimal in these riparian areas. Exceptions could be made for essential roads and pipelines or facilities in river deltas at the discretion of the authorizing officer. Reflecting the focus on riparian areas, land cover types that are more abundant in the area with NSO stipulations compared to the overall program area include water, partially vegetated, and barrens. Moist sedge-willow tundra is also more common in the NSO stipulation areas. Willow and birch shrub communities are relatively less abundant in the areas with NSO stipulations; these vegetation types primarily occur in the southern half of the program area, most of which would not be available for lease sales under Alternative D. Wetlands within the NSO areas comprise mainly estuarine open water and emergent meadow wetland types, which are abundant across the program area. Thus, the NSO stipulations under Alternative D primarily would protect fish and aquatic resources and birds rather than high-value vegetation or wetlands.

The area designated for CSU is under Alternative D is 1 percent of the program area, and primarily consists of moist tundra types and emergent meadow wetland classes that are abundant across the overall area. Thus, the CSU stipulations would be unlikely to substantially affect impacts on vegetation and wetlands. TL stipulations would apply to only 0.1 percent of the program area, and they would not significantly affect impacts on vegetation or wetlands.

The program area that would be available to leasing under STC under Alternative D would be small (2 percent of the program area), and it is dominated by the widespread vegetation type moist sedge-shrub tundra with wet inclusions (65.1 percent). The most common wetland classes in the STC area are seasonally flooded and flooded emergent meadow (49.9 percent and 26.4 percent, respectively); both wetland classes are abundant in the program area. Thus, impacts on vegetation and wetlands within the program area, open to leasing with only STC, would be minimal.

The estimated surface development under Alternative D would be 1,040 acres. Using the hypothetical direct footprint for one anchor development (as described in *Direct and Indirect Impacts* above), the 1,040 acres of gravel infrastructure would result in approximately 9,152 acres of indirect impacts from dust deposition (based on the 328-foot dust dispersion buffer). The Alternative D indirect impacts would be 52 percent less than Alternative B. Under the maximum development scenario for Alternative D, the most affected land cover types would be tussock tundra, shrub tussock tundra, and moist sedge-shrub tundra with wet inclusions; direct and indirect impacts on these types would total 2,407, 810, and 1,869 acres respectively (**Table K-4 in Appendix K**). Similarly, the most affected broadscale wetland types would be seasonally flooded emergent meadow, saturated emergent meadow, and flooded emergent meadow, with total direct and indirect impacts estimated at 2,983, 2,187, and 1,526 acres respectively (**Table K-7 in Appendix K**). These commonly impacted landcover and wetland types occur primarily in the southeast portion of the program area and overlap the areas in Alternative D that are not open to leasing. These relatively dry areas, characterized by tussock-forming sedges and low shrubs, are most suitable for construction and also most vulnerable to impacts from seismic exploration and ice roads. Alternative D results in a significant reduction in impacts on the most commonly occurring landcover and wetlands in the program area compared to Alternative B.

Alternative D2

Under Alternative D2, approximately 75 percent (1,163,500 acres) of the program area would be excluded from leasing, including the Porcupine Caribou Herd primary calving habitat area, river polar bear denning habitat, and spring aufeis areas on the Tamayariak River. Approximately 15 percent (231,700 acres) would be available for lease sale with NSO stipulations. CSU stipulations would apply to approximately 5 percent of the program area, while approximately 5 percent of the total program area would be available for lease sale under STC. An additional 3,100 acres or 0.2 percent of the program area would be designated under TL conditions (see **Map 2-8, Appendix A**).

The 80,900 acres designated as STC would be almost equally divided between tussock tundra, moist sedge-willow tundra and moist sedge shrub tundra with wet inclusions encompassing 27.3 percent, 25 percent and 20.7 percent of the STC area respectively. The area designated under TL would be primarily dominated by tussock tundra encompassing 50.8 percent of the small TL area (**Table K-3 in Appendix K**).

The most abundant wetland classes within areas that are not available for leasing under Alternative D2 would be seasonally flooded emergent meadow, saturated emergent meadow, and flooded emergent meadows (30.7 percent, 20.2 percent, and 19.7 percent, respectively). The most common wetland classes that would be under NSO stipulations are seasonally flooded emergent meadow, saturated emergent meadow, and flooded emergent meadow (18.8 percent, 14.6 percent, and 14.6 percent respectively). In the small area that would be under CSU stipulations, the most common wetland classes are seasonally flooded emergent meadow, saturated emergent meadow and saturated scrub shrub (40 percent, 30.5 percent, and 13.8 percent, respectively). Within the limited area that would be available for leasing under STC, the most common wetland classes are seasonally flooded emergent meadow (39.5 percent) and saturated emergent meadow (27.6 percent). The area designated under TL would primarily be dominated saturated emergent meadow encompassing 33.2 percent of the small TL area (**Table K-6 in Appendix K**).

The estimated surface development under Alternative D2 would be 995 acres. Using the hypothetical direct footprint for one anchor development and the dust shadow multiplier of 8.8 (as described in *Direct and Indirect Impacts*) the gravel infrastructure footprint would result in approximately 9,271 acres of indirect impacts from dust deposition. The combined Alternative D2 direct and indirect impacts would be 53 percent less than Alternative B. Under the maximum development scenario for Alternative D2, the most affected land cover types would be tussock tundra, shrub tussock tundra, and moist sedge-shrub tundra with wet inclusions; combined direct and indirect impacts on these types would total 2,075, 1,192 and 1,056 acres respectively (**Table K-4 in Appendix K**). The most affected broadscale wetland types would be seasonally flooded emergent meadow, saturated emergent meadow, and flooded emergent meadow, with total direct and indirect impacts estimated at 2,551, 1,922, and 1,049 acres respectively (**Table K-7 in Appendix K**).

Alternative D2 would have the least impacts on vegetation and wetlands of all the action alternatives with an additional 24 percent of the program area designated as no leasing as compared to Alternative D. The projected direct footprint area is approximately 9 percent less than proposed for Alternative D. Reductions in footprint acres reduce overall vegetation and wetland impacts because direct impacts result in permanent loss of habitat and indirect impacts can also have lasting impacts that degrade habitat function. Increasing the area not available for leasing would reduce the extent of short to medium term damage to vegetation and wetlands from seismic exploration. The most common wetland and vegetation types within the no-lease areas under Alternative D2 are the drier vegetation types and saturated wetlands with more tussock and shrub cover that are more susceptible to damage from seismic exploration. The inclusion of polar bear denning habitat in no-lease areas and the stipulations limiting direct impacts within riparian buffers also reduces vegetation and

wetland loss in vegetation and wetlands associated with high wildlife habitat value, including wet sedge meadow and marsh vegetation types, and flooded and semi-permanently flooded wetlands. While Alternative D2 minimizes the potential footprint of impacts, these impacts would be largely concentrated on yedoma deposits that are susceptible to thermokarst and may lead to long-term damage to vegetation and wetlands.

Transboundary Impacts

There would be no transboundary direct or indirect impacts on vegetation and wetland resources.

Cumulative Impacts

The RFFA considers past present and future development projects across the entire coastal plain of Alaska's North Slope, which includes all the low-lying areas north of the Brooks Range extending along the Chukchi and Beaufort Sea coasts from Point Lay to Kaktovik. Past projects since the inception of oil and gas exploration on the North Slope are considered, as well as proposed projects projected to occur during the life of the current proposed Coastal Plain leasing program. Disturbance categories considered in the RFFA include oil and gas, transportation, subsistence, recreation, scientific research, community development projects, and climate change (**Table G-1 in Appendix G**).

Impacts from oil and gas development far outweigh any other disturbance category and include all the specific impacts described in the Direct and Indirect Impacts section above. Climate change is likely to have an accelerating effect on oil and gas disturbance, increasing the potential cumulative effects across the Coastal Plain (Raynolds et al. 2014). To date the combined direct impacts of gravel infrastructure are estimated at 12,789 acres (0.1 percent of the North Slope coastal plain) as calculated from the North Slope Infrastructure layer maintained by the BLM. (BLM 2022a). As noted above, direct impacts from development in the program area are expected to be 2,000 acres or less, varying by alternative, which is approximately 15 percent of the existing direct impacts on the North Slope. Using the 1:8.8 ratio to calculate indirect effects yields an estimated indirect effects zone across the North Slope of 112,543 acres (0.8 percent of total area). Using the same ratio, the maximum extent of the indirect effects zone for the Coastal Plain leasing program would be 17,600 acres. Under Alternative B, assuming the maximum development scenario, the total cumulative indirect effects zone would increase to 0.9 percent of the North Slope.

Direct Impacts

- The vast majority of the landcover on the North Slope is wetlands and thus most direct impact involves the permanent loss of vegetation and wetlands. While direct impacts cumulatively do not account for a high percentage of the overall wetland area on the North Slope each individual project would impact more wetland acres than a similar project in a non-permafrost landscape with patchy wetland distribution.
- Compensatory mitigation for direct impacts on North Slope wetlands is intended to compensate for the permanent loss of wetlands. Compensatory mitigation can include the establishment of long-term protected wetland habitats that are high value and threatened, or through the purchase of compensatory mitigation credits from a USACE-approved wetland mitigation bank or in-lieu fee program, should one be available in the project area. The overall impacts have resulted in a net loss of wetlands and wetland function across the Coastal Plain which may only be reversed as projects get decommissioned and reclamation projects are completed. Additionally, many of the older fields on the North Slope may have been established prior to the wetland compensatory mitigation rule and thus re-establishment of wetland function may not be included in some older decommissioning plans. Overall net wetland loss over time is only a small percentage of the remaining undisturbed wetlands

on the North Slope but would never be recovered unless reclamation projects are included in compensatory mitigation and decommissioning planning (NRC 2003).

- The extent of rare and sensitive plant populations across the program area is largely unknown with no recent collections documented in the Alaska databases. It is not known whether any alternative under consideration would reduce important rare and sensitive plant habitat nor if cumulative impacts would contribute detrimentally to any individual species distribution.

Indirect Effects

- Long-term effects to wetlands and vegetation due to seismic exploration has had far reaching aesthetic and functional impacts across the entire North Slope and would likely be similar for the program area depending on the alternative. Aside from the reduction in area subject to seismic exploration impacts for some alternatives, ROP 11 would address impacts to vegetation through the use of low-ground-pressure vehicles and route alterations to avoid low snow areas and sensitive tundra types. Recent studies suggest that while indirect impacts may occur initially, the effects on vegetation and wetlands from seismic exploration do recover over time (Jorgenson 2018; Reynolds et al. 2020, and NRC 2003). The overall cumulative impacts within the context of the entire North Slope are likely to be minimal within the reasonably foreseeable future.
- The dust dispersion buffer indirectly impacts would extend to a maximum of 112,543 acres for the Alternative B development scenario. Cumulative impacts on the entire North Slope Coastal Plain even under the maximum development scenario would increase the proportion of impacted area to undisturbed wilderness to 0.9 percent.
- Climate change remains the most adverse effect potentially contributing to range expansion of shrubs and invasive species and hastening permafrost melt and coastal erosion. Climate change effects have been documented in the Coastal Plain of the North Slope and are expected to increase through the foreseeable future contributing to potential increases in estimates of indirect impacts by amplifying the severity and extent.
- The establishment of ROPs and Lease Stipulations and the development of a wetland compensatory mitigation plan reduces the overall cumulative impact, especially for Alternatives C, D, and D2, which include areas not available for lease sale which is equivalent to preserving wetlands and vegetation from any impacts except for climate change.

Alternative D2 would contribute the least to ongoing cumulative effects and Alternative B the most, however, under the maximum disturbance scenario, only 0.9 percent of the entire Coastal Plain would be adversely impacted. The remaining undeveloped area is currently and is predicted to remain wilderness throughout the reasonably foreseeable future. The establishment of ROPs and leasing stipulations for Alternatives C, D, and D2 reduces the area potentially subject to direct impacts and best management practices in construction and operation can also reduce the extent of indirect impacts. In addition to ROPs and leasing stipulations, the wetland compensatory mitigation process can be used to reduce the overall net loss due to direct impacts.

3.3.2 Fish and Aquatic Species

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur

because of the issuance of leases are considered potential indirect impacts of leasing. Such post-lease activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the following analysis considers potential impacts on fishes and aquatic resources from on-the-ground post-lease activities. For a more detailed description direct and indirect impacts from post-lease activities, see Chapter 4 of the NPRA/IAP EIS (BLM 2012), GMT2 EIS (BLM 2018a), and Nanushuk EIS (USACE 2018).

As a proxy for a geographically explicit project footprint, potential impacts on fishes and fish habitat are described by types of available fish habitat, scarcity of those habitats in the program area, and importance of those habitats to aquatic species.

The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the direct or indirect impacts.

Alternative A

Alternative A (No Action Alternative) would not establish an oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain in the Arctic Refuge. Resource trends and management actions would continue as described in the Arctic Refuge CCP (USFWS 2015a). There would be no potential direct or indirect impacts on fishes and aquatic species under Alternative A.

Impacts Common to All Action Alternatives

Post-oil and gas leasing activities that could affect fishes and aquatic organisms and their habitat would occur under all action alternatives, though their locations could vary. The leasing phase would have no direct or indirect impacts on fishes or other aquatic species, but any lease sale would likely lead to future exploration, including seismic activity and potentially construction and operation of oil and gas facilities. Potential effects on aquatic species and habitats from other phases—exploration, development, production, and abandonment and reclamation—are summarized below; locations that would incur more or fewer impacts are described by alternative in the following sections. Note that many areas with the most species diversity and density of freshwater fishes—the Canning and Staines Rivers and coastal marine fishes (nearshore marine, lagoon, and river delta environments)—are in portions of the program area that are designated as the areas of —high and medium hydrocarbon potential under the hypothetical development scenario (**Map C-1 in Appendix C**).

Direct Habitat Loss or Alteration

Activities with the potential to affect fishes and aquatic species include the construction and operation of new gravel roads, gravel pads, airstrips, pipelines, culverts, bridges and barge landings or docks, and gravel mining. Infrastructure would be constructed mainly during the development phase of the post-leasing program and would result in localized permanent loss or alteration of aquatic habitats due to the placement of fill. Fill for infrastructure would directly and permanently remove aquatic habitat within the fill footprint. Gravel fill would likely not be placed in waterbodies due to practicability; however, fill placed near waterbodies could alter aquatic habitats and indirectly affect fishes, as described below in *Indirect Habitat Alteration*. Bridge piers could be located in waterbodies or floodplains.

During construction of docking sites, short-term water quality changes, such as increased turbidity, could alter fish and aquatic species' habitat and disturb and displace fishes. Use of culverts could directly alter aquatic habitats by replacing substrates, banks, or both with metal pipe. This would adversely affect the habitat in the long term by removing the capacity of the fill footprint to contribute nutrients or organic matter to the waterbody and by altering hydrology in the immediate area.

Alteration of aquatic environments through increases in sediment load (e.g., from increased run-off from roads or changes in flow patterns near culverts) may impact aquatic biota. For example, increased sediment loads may lead to increased scouring in streams which may in turn reduce biofilms on substrates, thereby introducing a bottom-up effect on food resources whereby these micro biofilms are reduced, influencing the availability of invertebrate food resources for fish.

Buried pipelines, such as the STP pipe, would alter marine sediments in the fill footprint due to trenching to bury the pipe. This would adversely affect the habitat in the short term by removing invertebrate food sources and potential algal cover in the trench footprint until the invertebrate and algal resources regenerate. It would also increase sedimentation and turbidity, which may decrease habitat suitability for some species.

Gravel would be mined and transported over gravel or ice roads or both. No specific gravel mining sites have been identified under the proposed leasing program, but estimated volumes of the hypothetical development scenarios are summarized in **Appendix C**. Because gravel is often most abundant in waterbodies, gravel may be mined in waterbodies and directly adjacent floodplains, which would alter aquatic habitats. Existing habitats in potential mining sites would be adversely affected in the long term by the removal of substrate and the capacity of the mining footprint to contribute nutrients or organic matter to the waterbody.

Following gravel extraction in or next to waterbodies, the excavation can then serve as a water reservoir for industrial activities. This is common practice in other North Slope gravel mines farther west (BLM 2012). If gravel is mined next to waterbodies or floodplains, these impacts would be reduced, compared with those constructed directly in waterbodies.

A BLM-approved abandonment and reclamation plan would be required once an excavation pit is decommissioned and would comply with ROP 35 and the Clean Water Act, Section 404(b)(1) guidelines. Impacts resulting in permanent loss of aquatic habitat through the placement of fill or excavation are not expected to recover naturally; thus, specialized treatments would be proposed to recover some ecological function (NRC 2003). Disturbances associated with placement of gravel fill and excavation may be unavoidable and represent significant impacts on aquatic habitat in the long term, even after rehabilitation.

Indirect Habitat Alteration: Fugitive Dust and Gravel Spray

Activities associated with the post-leasing program that could cause potential dust and gravel spray effects include construction and operation of new gravel roads and gravel pads and vehicle traffic on gravel infrastructure. These activities and the impacts described below could mainly occur during the development and production phases of the post-leasing program; impacts from road use would last until the road is removed or decommissioned.

Dust and gravel spray would be generated during future gravel placement, gravel compaction, and vehicle traffic on gravel roads and pads. Road dust accumulation is greatest within 35 feet of roads, but deposition may occur over a broader area. Roughly 95 percent of dust settles within 328 feet from the road surface (Myers-Smith et al. 2006; Walker and Everett 1987). Walker et al. (2015) found even at 656 feet from the road, the underlying organic material has a gray color indicating leached dust. Dust could increase turbidity in waterbodies next to roads and construction areas. This could inhibit normal physiological function in fish, such as oxygen uptake across gill membranes, and could increase sediment and gravel inputs to existing substrates. This would also have a long-term adverse effect on aquatic habitats and species by decreasing habitat quality, including through mobilization of possible contaminants specific to the underlying geology of gravel pits where sediment is mined. Although directed studies on the impacts on fish from fugitive dust related to mining and oil and gas development activities are limited, it is well understood that fishes and

invertebrates are sensitive to increases in certain analytes above background levels, particularly in developmental stages (e.g., egg and larval stages) (Farag et al. 1997; Parrott et al. 2017) These sequestered chemicals or elements are not necessarily harmful themselves but could be harmful, in combination with other water chemistry attributes, such as pH.

Dust abatement would require the use of additional water resources, which are already limited in the program area, compared to other areas to the west in the ACP. For additional information on construction activities that could increase post-lease dust and gravel spray in the program area waterbodies, refer to **Section 3.2.10, Water Resources**.

Indirect Habitat Alteration: Flow Alteration and Fish Passage

Post-leasing oil and gas activities that could affect flow alteration and fish passage include construction of ice roads and subsequent ice road melt, snow management activities, use of exploration vehicles or other off-road vehicles for seismic surveys, maintenance, and the placement of bridge piers or piles in waterbodies. These activities and the impacts described below could occur during all phases of the post-leasing program; in the case of new infrastructure, they would last until removal. Flow alteration can result from obstructions in the natural flow path, either by infrastructure or by compacted ice. Compacted ice over and surrounding waterbodies can delay ice melt and temporarily alter aquatic habitats. Compacted ice can change natural drainage patterns or cause water impoundments during spring break up. Delayed melt of ice roads or pads can also temporarily block fish passage, which can impede Arctic fishes attempting to migrate from overwintering areas to feeding habitat during the early part of the open-water season.

As discussed in BLM (2012), many fish move upstream during breakup to access productive feeding habitat or to reach locations only accessible during spring flooding. Energy reserves in spring are typically low for most fish and additional stress or delayed access to feeding habitats could have adverse impacts. A barrier to movement could alter migration patterns to lower quality feeding habitat and increase energetic demands, which could compromise survival. Ice compaction would temporarily alter aquatic habitats near ice infrastructure or near where off-road activities would occur. This could have longer-term adverse effects on fish if their migration is annually delayed.

Culverts would likely be used extensively under all action alternatives to access road water crossings and provide cross drainage. The design criteria for all culverts would follow USFWS and ADFG requirements, such that they would avoid restricting fish passage or adversely affecting natural stream flow (ROP 22). Bridges would be required at any stream crossing with anadromous fish use; however, bridge piers or piles could also alter flow due to ice blockage during spring break up. Effects would be the same as those described above for flow alteration due to ice compaction.

Indirect Habitat Alteration: Water Quantity

Post-lease oil and gas activities that could affect water quantity include water withdrawal from lakes or streams for ice roads, water supply, dust suppression, and other industrial (e.g., camp) uses. Withdrawals would mainly occur during the development and production phases of the post-leasing program.

Water withdrawal from lakes can affect the amount of habitat available to overwintering fishes, summer habitat accessibility, and habitat characteristics. Removal or compaction of snow can also increase the depth of freezing on lakes. As a result, the water quantity available in a lake during the winter can be greatly reduced.

Because unfrozen freshwater in winter is scarce in the program area, any future withdrawal from these areas would have the most adverse effects on fishes. Springs and deep lakes are particularly important, sensitive

habitat in the program area, in part because there are so few of them that their scarcity limits the distribution of fishes in the program area.

ROPs 8 and 9 require water to be withdrawn to maintain natural hydrologic regimes in order to conserve fish and wildlife and their habitats. For additional information on current liquid water availability in the program area versus typical requirements for post-lease oil and gas activities, refer to **Section 3.2.10**, Water Resources.

Indirect Habitat Alteration: Water Quality

Activities that could affect water quality would mainly occur during the development and production phases of the post-leasing program. They would be as follows:

- Water withdrawal from lakes or streams for ice roads, water supply, dust suppression, and other uses
- STP discharge to marine waters
- General construction in or near waterbodies
- Vehicle traffic on gravel infrastructure
- Gravel mining

Future water withdrawal from lakes in the winter could temporarily alter lake water chemistry (until spring breakup and recharge) by depleting oxygen, increasing solutes, and changing pH and conductivity. Reducing water quantity in a lake during the winter can increase the salinity of the water beneath the ice.

Construction or gravel mining that disturbs soils can increase sediment runoff, turbidity, and contaminant concentrations in streams. During future construction or mining, this would have a short-term effect on aquatic habitats and species around or immediately downstream of soil-disturbing activities. Fugitive dust from vehicle traffic could also increase local turbidity in streams around gravel infrastructure. Dust effects on aquatic habitats and species would be long term and adverse.

Discharge from a STP, such as brine, filter backwash water, and rinse/cleaning water, could alter water quality, such as by increasing the salinity and reducing dissolved oxygen in the waterbody into which it is discharged. Alterations would be highest at the discharge point before mixing can occur and would alter habitat conditions for aquatic species, potentially displacing them from this area.

The effects of brine discharge may be highest in the winter when freshwater may be frozen. Effects would be particularly pronounced if the discharge is in the brackish lagoon waters that are hypersaline in winter. Anyone discharging STP byproducts would be required to follow ROP 2 and to meet standards in the treatment plant's APDES discharge permit, including a requirement for further treatment and those for potential mixing zones.

Disturbance or Displacement: Noise and Human Activity

Post-lease oil and gas activities that could cause effects related to noise and human activity are seismic surveys (use of vibroseis to image the subsurface) during the exploration phase and gravel mining (dredging or explosives) and pile driving for bridges or VSMs during the development and production phases.

Future seismic exploration is proposed for during winter (**Appendix C, Section C.7.2**). Seismic surveys generate increased sound pressures in waterbodies. The high-intensity acoustic energy produced by seismic surveys can damage auditory sensory hair cells in fish, reducing their ability to hear (McCauley et al. 2003; Popper 2003; Smith et al. 2004; Popper and Hawkins 2019). Underwater shock waves can also injure the swim bladder and other organs and tissue, which could injure or kill fish (Popper and Hawkins 2019). Increased sound pressures in unfrozen springs in winter could stress fish because they would not have alternate habitats where they could move to avoid effects; thus, seismic surveys could disturb, injure, or kill fish in

unfrozen waterbodies (springs) in the winter. Vibroseis rigs operating on the ice overhead can create sound pressures great enough approximately 33 feet from the source to cause avoidance behavior (Greene 2000, and Nyland 2002, as cited in BLM 2012). While vibroseis has been shown to disturb fish and cause avoidance, the impacts are thought to be minimal if careful guidelines are followed (Morris and Winters 2005). Effects are further detailed in BLM 2012 and USACE 2018.

Noise generated by vehicles, machinery, and ships, the use of marine barge routes in the future could have local impacts on fish, such as disturbance, displacement, and stress-induced fleeing. Fish have exhibited avoidance behaviors when confronted with noisy vessels (refer to Chapter 4 of the NPRA/IAP EIS [BLM 2012] for more information on noise impacts).

Noise associated with vehicles and machinery would be greatest during construction but would occur to a lesser degree throughout the program area during the life of any development projects. Because most construction would occur in the winter when waterbodies would have ice cover, noise effects on fish would be reduced during that time.

Noise associated with shipping would be more infrequent. The hypothetical RFD scenario (**Appendix C**) anticipates two vessels per year on average. It is well known that noise associated with shipping, or even noise from onshore activities being projected to offshore environments, may increase stress cortisol levels, inhibit intraspecies communication, and even contribute to hearing loss in fish (Thomsen et al. 2006; Vasconcelos et al. 2007). These effects may be more pronounced in areas with alternating sound wave amplitude and frequency—that is, quiet followed by loud noises—versus areas with continuous noise (Wysocki et al. 2006). The hypothetical RFD scenario is applicable to the program area, and speculation beyond where marine vessel traffic would go is beyond the scope of this analysis.

Injury or Mortality: Noise

Post-lease oil and gas activities that could affect fishes and aquatic species from noise include seismic surveys (use of vibroseis to image the subsurface), gravel mining (dredging or explosives), and pile driving for bridges or VSMs. Impacts from seismic surveys would mainly occur during the exploration phase, while gravel mining and pile driving would mainly occur during development and production.

As described in *Noise and Human Activity*, noise can disturb fish, and, at higher dB or in greater intensity, it can injure or kill fish. Restricting seismic surveys to winter (ROP 11) when waterbodies (except springs) are frozen and avoiding areas around springs would minimize effects on fish. Seismic survey effects would be further minimized by ROP 14 which would restrict vibroseis-based surveys to one a single vibroseis shot, if possible, above potential fish overwintering areas in Alternative B, and would not allow seismic surveys over potential fish overwintering habitat at all in Alternatives C and D.

Pile driving can also create sound levels that affect fish. Assuming that piles would be installed in winter, if the bridge or VSM sites freeze to the bottom, the ice would diminish the sound, and the potential impact on fish in any adjacent overwintering habitats would be negligible.

Entrainment

Post-lease oil and gas activities that could cause effects related to entrainment include gravel mining and water withdrawal from lakes or streams or from marine waters, such as the STP, during development and production.

Though injury or mortality of fish from entrainment or impingement at water intake could occur, the effect would be minimized by ROP 9 that ensure that intakes be screened. As is described in BLM 2012, it is unlikely that fish would be entrained in the water intake.

Contaminants and Spills

Post-lease oil and gas activities that could cause effects related to contaminants would mainly occur during the production phase of the post-leasing program. However, during seismic surveys and exploration drilling, direct injury and mortality of fishes could occur from accidental releases or discharges or insecure containment of hazardous materials. Spills also affect fish indirectly, through changes in habitat and food supply and by exposure through the food chain. Our understanding of the impacts on the health of marine and freshwater fishes and their habitat following direct or indirect exposure to oil is an evolving science. However, several studies conducted in the years following the *Exxon Valdez* oil spill indicate potential lasting impacts on fish populations. Laboratory studies have shown that several chemical compounds present in crude oil, including Polycyclic aromatic hydrocarbons (PAHs), may be responsible for heart failure in fish embryos (Incardona et al. 2004, 2009). Even low exposure of crude oil to Pacific herring and pink salmon embryo resulted in permanent changes in both the physical nature and function of heart tissue under (Incardona et al. 2015). Furthermore, pink salmon embryos subjected to oil impacted gravels have been shown to have higher mortality rates than those in clean gravels (Heintz et al. 1995, Marty et al. 1997). Thus, residual oils may impact fish populations for as long as these complex chemicals persist in the aquatic environment. The Prince William Sound Pacific herring (*Clupea pallasii*) population collapsed within 4 years of the Exxon Valdez spill, though there is considerable debate as to the exact relationship between oil toxicity following the spill and the subsequent fishery collapse (Ward et al. 2017). It is known that oil toxicity due to direct exposure may impact nervous system function and osmoregulatory (i.e., gill function) in juvenile and adult fishes, potentially leading to mortality (Grosell and Pasparakis 2021).

Impacts to marine fish as well as aquatic invertebrates and intertidal habitats were considerable in the years following the Exxon Valdez oil spill (Barron et al. 2020). The heavily oiled sheltered beaches in Prince William Sound were still reported as having significant patches of oil in the sub-surface sediment nearly 30 years following the spill. Initial cleanup efforts were hampered by the remote location of the Exxon Valdez oil spill and subsequent storm events mixed much of the initially recoverable oil, spreading it throughout the sound and burying it under a layer of sediment in some cases. Subsequent cleanup efforts contributed to negative impacts to the intertidal zone both in terms of algal and invertebrate density. For example, mollusk and sediment infauna abundance was diminished for nearly a decade post-spill. Studies of the impacts to aquatic habitats from other large spills like the Deepwater Horizon in the Gulf of Mexico have determined that nearshore intertidal habitats and plant communities are often most impacted (Beyer et al. 2016). The response time following a spill appears to greatly reduce but not entirely alleviate potential impacts from a catastrophic spill, as evidenced from the Hebei Spirit oil spill in Korea (Barron et al. 2020).

Oil spills in Arctic climates provide additional challenges for remediation of the impacts of spills (Si-Zhong et al. 2009, Helle 2020). Potential deleterious impacts to aquatic environments may include a prolonged timeframe for bioremediation to occur, in part due to the potential blanketing of microbial communities (i.e., biofilms) on hard substrates including sediment, rock, coral, and even ice. The presence of ice may present difficulties in cleanup activities and may be further exacerbated by oil encapsulation into the ice, which would result in a longer cleanup period (Blanken et al. 2017). Modeling of the potential impacts to fish and aquatic invertebrates suggests that exposure potential depends on the type of oil released (e.g., light, medium, or heavy) and the relative mobility and habitat preference of the biota (e.g., demersal or pelagic, under dependent species). Aquatic biota of all types are likely to be highly sensitive to the impacts of catastrophic oil spills, both from direct physiological impacts and indirect changes in food resource accessibility (Nevalainen et al. 2019).

During seismic exploration, the primary potential for contaminants to be released would be accidental fuel spills from vehicles, storage tanks, aircraft, and equipment during transport or fueling. Such spills would be medium to small (see **Section 3.2.11**, Solid and Hazardous Waste) and would continue to be the most common types of spills throughout any future development project. Most small spills would involve refined oils and fuel, antifreeze, or saltwater used in hydro-testing and well injection.

During exploration drilling, there is a risk of large or very large crude oil spills (see **Section 3.2.11**), due to well blowout. Hazards include potential spills from storage, use, and transport of waste and hazardous materials, potential spills from wells, pipelines, or other infrastructure, and mobilization of contaminants into aquatic or terrestrial systems from erosion, fugitive dust, and permafrost degradation. As described in detail in BLM 2012, spills can adversely affect aquatic habitats and species by exposing them to contaminants. Spills can injure or kill fish and effects can be long or short lived depending on the type, size, duration, and season of the spill. Although the risk of spills would be reduced in the NSO areas designated under each alternative, the frequency of spills would not differ. Under all action alternatives, setbacks from rivers and streams (Lease Stipulation 1) would provide some protection from accidental fuel spills for important fish habitats in riparian and delta habitats, although all action alternatives include exceptions for essential pipelines, roads, and gravel mines. Spills in water would be more difficult to contain, but important coastal and lagoon habitats for fishes are identified as NSO under all action alternatives (Lease Stipulation 4, with exceptions for barge landings and pipelines). This would somewhat reduce the potential area that would be affected by small or medium spills in the coastal and nearshore marine environment.

Under all action alternatives, ROPs 1 and 2 would minimize the generation and hazards of hazardous waste. ROP 3 would provide protection from some types of fuel spills for fish habitats associated with waterbodies and in riparian areas (fueling equipment and fuel storage over 210 gallons would be prohibited within 100 feet of the active floodplain of any waterbody; see exceptions). Setbacks from fish-bearing waterbodies under all alternatives (ROP 19), prohibition of exploratory drilling in fish-bearing waterbodies under all alternatives (ROP 16), and setbacks or restrictions varying by alternative (Lease Stipulations 1, 2, 3, and ROPs 3, 11, 19) would provide some protection from accidental fuel and other fluid spills for important fish habitats, although all alternatives would include exceptions for essential pipelines, roads, and gravel mines.

Small spills are likely, medium-sized spills are less common, and large and very large spills are uncommon. Most spills would be fewer than 100 gallons and would be restricted to ice or gravel roads and pads, where they would be cleaned up prior to contaminants reaching adjacent tundra or waterways. Spills that reach tundra are less common; they typically affect fewer than 5 acres (BLM and MMS 1998) and are also unlikely to impact fishes. Spills in water would be more difficult to contain, but important nearshore marine, lagoon, and barrier island habitats have NSO protections under all action alternatives (Lease Stipulation 4), although exceptions for barge landings and essential pipelines and coastal infrastructure would be made.

Large and very large spills are uncommon in northern Alaska, though they do occur; six spills larger than 100,000 gallons have occurred on the North Slope (see **Appendix I**) and such spills could pose substantial risks to fishes and their habitats, depending again on location and timing. Large spills from blowouts or from pipeline leaks could reach rivers and streams and the nearshore lagoon system. Spill containment at strategic points on waterways would likely keep oil from flowing downstream into lagoons. Nonetheless, if oil escaped, many fish species would be vulnerable, and resulting impacts on subsistence users could occur. Fuel spills in the marine environment may affect fishes during construction and operations of docking facilities, gravel islands, STPs on the coast, shipping activities, and during screeding for barge landings.

See **Section 3.2.11**, Solid and Hazardous Waste, for more discussion of spills.

Off-road Vehicles

Summer vehicle access may lead to compaction and displacement of soils, as well as breakage abrasion, compaction and displacement of vegetation, and localized fuel spills. Although degradation of fish habitat from off-road vehicle traffic in summer could occur, the impacts would be minimized by ROP 41, which would only allow low-ground-pressure vehicles to travel off gravel pads and roads in the summer if studies on the impacts demonstrate that there would be no more than minimal impacts on soils and vegetation.

Aquatic Invasive Species

The aquatic invasive species *Elodea canadensis* could invade freshwater inland lakes in the project area with increased water-based air traffic in the area. Once established, *Elodea* can alter the water flow patterns, increase turbidity and pH of the water and accumulate nutrients while reducing availability in the substrate (ACCS 2018c), which could have impacts on fishes and aquatic species. ROP 43 is designed to prevent the introduction or spread of nonnative invasive species within the Coastal Plain.

Alternative B

Alternative B includes 1,563,500 acres of land available for lease sale, of which 359,400 acres would be subject to NSO restrictions and 585,400 acres would be subject to TL (**Table 2-1**). Another 618,700 acres of the total available lease sale lands would be subject to STC (**Table 2-1**). Lease stipulations under this alternative would provide the fewest protections for aquatic habitats.

A total of 357,900 watershed acres within the area available for lease sale under Alternative B would be subject to NSO stipulations; 585,400 watershed acres would be subject to TL, and another 620,000 watershed acres subject to STC (**Table 3-27**).

Table 3-27
Use Restriction by Alternative for Aquatic Habitat in the Program Area

Metric	Use Restriction	Alternative B	Alternative C	Alternative D	Alternative D2
Watersheds (acres) ^a	Not offered for lease sale	0	526,269	797,280	1,163,400
	No surface occupancy	357,982	708,215	726,400	231,600
	Timing limitations	585,424	19	1,815	3,100
	Controlled surface use	0	123,867	15,900	84,300
	Standard terms and conditions	620,021	205,058	22,100	81,000
National Hydrography Dataset streams (miles)	Not offered for lease sale	0	1,266	1,919	2,580
	No surface occupancy	1,181	1,692	1,630	640
	Timing limitations	1,105	0	0	10
	Controlled surface use	0	274	3	200
	Standard terms and conditions	1,275	327	33	140
Anadromous rivers (miles)	Not offered for lease sale	0	94	120	200
	No surface occupancy	213	207	170	100
	Timing limitations	55	0	0	0
	Controlled surface use	0	3	0	0
	Standard terms and conditions	45	8	0	0
Lakes, ponds, and marsh/swamp (acres)	Not offered for lease sale	0	3,372	5,700	12,200
	No surface occupancy	5,922	15,499	15,600	9,300
	Timing limitations	4,685	0	0	0
	Controlled surface use	0	771	200	300
	Standard terms and conditions	11,298	2,262	400	200

Metric	Use Restriction	Alternative B	Alternative C	Alternative D	Alternative D2
Deep lakes (acres)	Not offered for lease sale	0	874	1,386	4,800
	No surface occupancy	1,538	5,431	4,655	5,600
	Timing limitations	1,257	0	0	0
	Controlled surface use	0	79	7	0
	Standard terms and conditions	3,407	718	154	100

Source: USGS GIS 2023; ADFG GIS 2018, BLM and USFWS 2022; Trawicki et al. 1991

^a National Hydrography Dataset hydrologic unit code 8 watershed.

Under Alternative B, a total of 1,181 miles of stream would be subject to NSO stipulations, 1,105 miles of stream subject to TL, and another 1,275 miles of stream subject to STC. In anadromous streams, 213 miles would be subject to NSO, with 55 miles subject to TL, and another 45 miles subject to STC. For lacustrine habitat (lakes, ponds, marsh/swamp), 5,922 acres would be subject to NSO, while 4,685 would be subject to TL, and another 11,298 acres would be subject to STC (**Table 3-27**).

There is a total of 1,538 surface acres of deep lake available for lease but designated as NSO under Alternative B, with another 1,257 acres subject to TL, and 3,407 acres subject to STC (**Table 3-27**). Recent lake bathymetry data for the program area is lacking. However, 119 lakes were surveyed in the late 1980s and early 1990s to investigate lake surface area, maximum depth, fish presence, and estimated liquid water volumes during fall and winter (Trawicki et al. 1991). Under Alternative B, 165,100 acres of total ice road extent is possible from liquid water source lakes in high oil potential areas available for lease (subject to STC) (see **Appendix I and K, Table J-8, and Map 3-14 in Appendix A**).

Under Alternative B, five rivers and creeks described in Lease Stipulation 1 (Sadlerochit, Tamayariak, Okerokovik, and Katakaturuk rivers and Marsh Creek) would have a 0.5-mile setback from the ordinary high water mark, and portions of five additional rivers (Canning, Hulahula, Aichilik, Okpilak, and Jago) would have a 1-mile setback for surface development. However, bridges, roads, and pipelines could still be built in the setbacks. Gravel mines could also be permitted in setback areas.

Fish-bearing streams along with fish-bearing lakes, ponds, and marshes would have a 500-foot setback under all alternatives (ROP 19). Effects on unprotected streams and coastal areas and the species that use them would be most pronounced under this alternative, and the types of impacts would be the same as those described under *Impacts Common to All Action Alternatives*. No exploratory well drill pads, production well drill pads, or CPFs would be allowed in the coastal waters, lagoons, and barrier islands under any alternative (Lease Stipulation 4), although exceptions for necessary infrastructure may be allowed. Additionally, before beginning any exploration or development within 2 miles inland of the coastline, an impact and conflict avoidance and monitoring plan would be developed and implemented under all alternatives (Lease Stipulation 9). Causeways and docks would not be permitted in river mouths or deltas, and artificial islands and permanent bottom-founded structures would be prohibited in river mouths and active stream channels on river deltas under all action alternatives (ROP 20). Similarly, causeways, docks, artificial islands, and bottom-founded drilling structures would be designed to ensure free passage of fishes under all alternatives (ROP 20). Prior to drilling, studies must be conducted to ensure drilling would not disrupt flow to or from perennial springs and waste injection wells would not contaminate them (Lease Stipulation 3). Withdrawal of water from springs would be allowed during summer months only. Withdrawal of unfrozen water from springs, rivers, and streams during winter would be prohibited under all action alternatives (ROP 8). Withdrawal of unfrozen water from lakes in winter may be authorized (ROP 9). Alternative B would also have the most potential adverse effects on EFH since some anadromous streams would not be protected and could be developed.

Alternative C

Alternative C includes 1,037,200 acres available for lease sale, of which 708,600 acres would be subject to NSO restrictions, 123,900 acres would be subject to CSU, and another 204,700 acres would be available for lease sale with STC (**Table 2-1**). This alternative maximizes the for-lease areas thought to be high potential for hydrocarbon development, while making additional considerations for caribou calving and post-calving habitat. Overall, lease stipulations under this action alternative provide more protection for aquatic habitats relative to Alternative B but less than Alternatives D or D2.

Under Alternative C, a total of 526,200 acres of watershed surface area is unavailable for lease sale, compared to 0 acres under Alternative B. A total of 708,215 watershed acres within the area available for lease sale would be subject to NSO (an approximate 98 percent increase over Alternative B). There would be no lands within the three watersheds available for lease sale subject to TL (compared to 585,424 acres under Alternative B). A total of 123,867 watershed acres would be available for lease but subject to CSU, compared to 0 acres under Alternative B. An additional 205,058 watershed acres would be available for lease but subject to STC, a 67 percent decrease from Alternative B (**Table 3-27**).

A total of 1,266 stream miles would not be offered for lease sale under Alternative C. Additionally, 1,692 miles of stream habitat would be subject to NSO stipulations (a 43 percent increase over Alternative B). There would be 0 miles of stream habitat subject to TL under Alternative C, while an additional 270 miles of stream habitat would be subject to CSU (compared to 0 miles under Alternative B). A total of 327 miles of stream habitat would be subject to STC (a 74 percent decrease from Alternative B).

Under Alternative C, a total of 94 miles of anadromous stream habitat would be unavailable for lease sale (compared to 0 miles under Alternative B), and 207 miles of anadromous stream habitat would be designated as NSO (a 3 percent decrease compared to Alternative B). No anadromous stream miles would be subject to TL, CSU, or STC under Alternative C.

For lacustrine habitat, 3,372 acres of habitat would be unavailable for lease sale, compared to 0 acres under Alternative B. There would be 15,499 acres of lacustrine habitat available for leasing but subject to NSO stipulations (162 percent increase over Alternative B). There would be 0 acres subject to TL for lacustrine habitat under Alternatives C, and 800 acres subject to CSU under Alternative C. A total of 2,262 acres of lacustrine habitat would be subject to STC (80 percent decrease compared to Alternative B).

Under Alternative C, there would be a total of 874 acres of deep lake habitat unavailable for lease sale. An additional 5,431 acres of deep lake habitat would be available but designated as NSO under Alternative C, an increase of 251 percent compared to Alternative B. There are no deep lakes within areas designated for lease sale with TL, though 79 acres are designated CSU, and 718 acres are subject to STC (79 percent decrease compared to Alternative B). Under Alternative C, 60,200 acres of total ice road extent is possible from liquid water source lakes in high oil potential areas available for lease (subject to STC) (see **Appendix I and K, Table J-8, and Map 3-14 in Appendix A**).

Under Alternative C, a total of 17 streams would have setbacks for surface development under Lease Stipulation 1, although exceptions would be allowed for roads and pipelines; gravel mining could also be permitted in setback areas. Setbacks for the Canning River east of the Arctic Refuge boundary and for the Aichikik and Okpilak river floodplains would be 3 miles; setbacks for the Hulahula River floodplain would be 4 miles; setbacks for the Sadlerochit and Jago River floodplains would be 1 mile; and the remaining 11 streams would have 0.5-mile setbacks.

Permanent facilities would be prohibited within 0.5 mile of the ordinary high-water line of all waterbodies in the Canning River delta (Lease Stipulation 2), which would protect most lakes in the program area, although exceptions would be allowed. There would be a 2-mile NSO setback from the coast, though exceptions would be allowed for barge landings, docks, and pipelines (Lease Stipulation 9); additionally, no permanent oil and gas infrastructure would be allowed within 1 mile of polar bear habitat on the Niguanak, Katakturuk, and Sadlerochit rivers, and Marsh and Carter creeks (Lease Stipulation 5), which would protect additional aquatic habitat. No development would be allowed in coastal waters, lagoons, and barrier islands, as with all alternatives; however, exceptions may be allowed with additional timing restrictions relative to Alternative B (Lease Stipulation 4). As described under Alternative B, withdrawal of water from springs would be allowed during summer only, and withdrawal of unfrozen water from lakes in winter may be permitted under Alternative C (ROP 9).

Future gravel mining would not occur in the active floodplain or channel of the Canning, Sadlerochit, Hulahula, and Aichilik rivers (ROP 24). Potential impacts on fishes and aquatic species would be reduced under Alternative C, compared with Alternative B, and would occur mostly in the western portion of the program area. Impacts would be predominantly indirect, such as changes to hydrology associated with infrastructure outside river and lake buffers or where infrastructure crosses river corridors. Additional 1- to 3-mile setbacks would be provided for four specific springs and aufeis areas (Lease Stipulation 3), which would reduce potential effects on aquatic species and habitats, as described under *Impacts Common to All Action Alternatives*. No leasing would be allowed within 3 miles adjacent to or above Sadlerochit, Tamayariak, Okerokavik, and Hulahula Fish Hole 1 springs (Lease Stipulation 3), nor no new non-subsistence infrastructure within a 1-mile buffer below the springs and along the aufeis formation. Alternative C would provide more protection to fishes from the effects of high-intensity acoustic energy from seismic surveys than Alternative B, as seismic surveys would only be allowed in areas available for lease sale (**Section 2.2**, Alternatives Development), and would not be conducted over any lakes with portions of unfrozen water (and therefore with potential for fish overwintering habitat; ROP 14).

Alternative D

Alternative D includes 765,800 acres available for lease sale; however, 726,300 acres of these acres would be subject to NSO restrictions; 15,900 acres would be subject to CSU; and 1,800 acres would be subject to TL (**Table 2-1**). The remaining 21,800 acres would be available for lease sale with standard terms and conditions (**Table 2-1**). The lease stipulations and ROPs under Alternative D provide the second most protections for aquatic habitats compared to other action alternatives, with more protections than Alternative C but less than Alternative D2.

Under Alternative D, a total of 797,280 acres of watershed surface area would be closed to lease sale compared to 0 acres under Alternative B. A total of 726,400 watershed acres within the area available for lease sale would be subject to NSO (a 100 percent increase over Alternative B). A total of 1,815 acres would be subject to TL (compared to 585,424 acres under Alternative B), while 15,900 watershed surface acres would be subject to CSU (compared to 0 acres under Alternative B, an 87 percent decrease). Additionally, 22,100 watershed surface acres would be subject to STC, a 50 percent decrease from Alternative B (**Table 3-27**).

A total of 1,919 stream miles would be unavailable for lease sale under Alternative D compared to 0 miles under Alternative B. There would be 1,630 miles of stream habitat subject to NSO, a 36 percent increase in protections over Alternative B. Alternative D would make 33 stream miles subject to STC (a 97 percent decrease from Alternative B; **Table 3-27**).

Under Alternative D, 120 miles of anadromous stream habitat would be unavailable for lease sale compared to 0 miles under Alternative B. A total of 180 miles of anadromous stream habitat would be available for lease under Alternative D, but would be subject to NSO, a decrease in available stream miles of 19 percent compared to Alternative B. No anadromous stream miles would be subject to TL, CSU or STC under Alternative D (**Table 3-27**).

For lacustrine habitat, 5,700 acres of habitat would be unavailable for lease sale under Alternative D, compared to 0 acres under Alternative B. Of the acres available for lease sale, a total of 15,600 acres of lacustrine habitat would be subject to NSO (162 percent increase over Alternative B). A total of 200 acres would be available for lease, but would be subject to CSU stipulations, compared to 0 acres under Alternative B, and 400 acres would be subject to STC (96 percent decrease compared to Alternative B; **Table 3-27**).

Under Alternative D, there is a total of 1,386 acres of deep lake habitat unavailable for lease sale compared to none for Alternative B (and an increase of 59 percent over Alternative C). An additional 4,655 acres of deep lake is available for lease, but they are designated as NSO under Alternative D, an increase of 251 percent compared to Alternative B. There are no deep lakes designated for lease sale with TL, though 7 acres are designated CSU, and 154 acres are subject to STC (96 percent decrease compared to Alternative B). Under Alternative D, 2,800 acres of total ice road extent is possible from liquid water source lakes in high oil potential area available for lease sale (subject to STC), a 98 percent decrease from Alternative B (see **Appendix I and K, Table J-8, and Map 3-14 in Appendix A**).

Under Alternative D, 29 named streams (plus any other unnamed river) would have setbacks for surface development, although exceptions would be allowed for roads and pipelines (Lease Stipulation 1). Setbacks for the Canning River east of the Arctic Refuge boundary and the Sadlerochit Spring Creek and Aichikik River floodplains would be 3 miles; setbacks for the Hulahula River floodplain would be 4 miles; setbacks for the Sadlerochit River, Jago River, and Itkilyariak Creek floodplains would be 1 mile; and 10 of the remaining streams would have 0.5-mile setbacks. All other named or unnamed rivers would have a 0.25-mile setback. As described under Alternative B, there would be a 500-foot setback from all fish-bearing waterbodies; however, Alternative D would measure the setback from the active floodplain rather than the high watermark, and it would not allow pipeline and road crossings near springs (ROP 19). Additionally, under Alternative D, all crossings of waterway courses would be made using a low-angle approach and any reinforced crossings shall be removed, breached, or slotted prior to break-up and ramps would be removed (ROP 12). This measure would maintain runoff patterns and allow fish passage. Exploratory drilling would be prohibited in fish-bearing waterbodies under all action alternatives, although an exception would be allowed; however, Alternative D would not permit exceptions in rivers and streams with resident, anadromous, or endemic fish populations (ROP 16).

Permanent facilities would be prohibited within 0.5 mile of the active floodplain (compared to the ordinary high watermark for Alternatives B and C) of any waterbodies in the Canning and Tamayariak watersheds (Lease Stipulation 2), which would protect most lakes in the program area, even though exceptions would be allowed. There would be no NSO setback from the coast under Alternative D; however, permanent oil and gas infrastructure would not be allowed within 1 mile of polar bear habitat on the: Canning, Niguanak, Katakturuk, and Sadlerochit rivers and Marsh and Carter creeks (Lease Stipulation 5), which would also provide protections for aquatic habitat. No development (though exceptions would be possible) would be allowed in coastal waters, lagoons, and barrier islands, as described under all action alternatives. However, Alternative D would include additional timing restrictions and avoidance of subsistence activity restrictions

relative to Alternative B (Lease Stipulation 4). Withdrawal of unfrozen water in winter from lakes or artificial water reservoirs may be permitted, as described under Alternative B (ROP 9).

Gravel mining would not be permitted in the: Canning/Staines, West Fork Tamayariak, Middle Fork Tamayariak, Tamayariak, Itkilyariak, Sadlerochit, Hulahula, and Aichilik rivers and Sadlerochit Spring Creek (ROP 24). Gravel mines could be permitted in setback areas near rivers and streams that do not support resident, anadromous, or endemic fish populations. Potential impacts on fishes and aquatic species would be the lower under Alternative D than Alternatives B and C, and they mostly would occur in the western portion of the program area. Impacts would be predominantly indirect, such as in changes to hydrology associated with infrastructure outside river and lake buffers, or where the infrastructure crosses river corridors. Alternative D would provide stronger protections for perennial springs than Alternative B and C (Lease Stipulation 3) and would allow no leasing or new non-subsistence infrastructure within 3 miles adjacent to or above Sadlerochit, Tamayariak, and Okerokavik springs, nor within 4 miles of Fish Hole 1 on the Hulahula River. Withdrawal of water from the: Sadlerochit, Tamayariak, Okerokavik, and Hulahula Fish Hole 1 springs and rivers supporting resident, anadromous, or endemic fish populations would be prohibited during summer (ROP 8). Alternative D would provide more protection to fishes from the effects of high-intensity acoustic energy from seismic surveys than Alternative B. Seismic surveys only would be allowed in areas available for lease sale (**Section 2.2**, Alternatives Development), and would not be conducted over any lakes with portions of unfrozen water, and, therefore, with potential for fish overwintering habitat (ROP 14).

Alternative D2

Alternative D2 includes 400,000 acres of leasable lands, of which 231,700 acres would be subject to NSO restrictions, 84,300 acres would be subject to CSU, and 3,100 acres would be subject to TL (**Table 2-1**). A total of 80,900 acres of available lease sale lands would be subject to STC (**Table 2-1**). Lease stipulations under this alternative would provide the greatest number of protections for aquatic habitats.

Under this alternative, a total of 1,163,400 acres of watershed surface would be unavailable for lease, compared to 0 acres under Alternative B. Within watersheds available for lease, a total of 231,700 acres be subject to NSO (an approximate 35 percent decrease over Alternative B NSO acreage). There would be 3,100 acres within the three watersheds available for lease subject to TL (compared to 585,400 acres under Alternative B). A total of 84,300 watershed acres would be available for lease but subject to CSU, compared to 0 acres under Alternative B. An additional 81,000 watershed acres would be available for lease and subject to STC, a 79 percent decrease from Alternative B (**Table 3-26**).

Under Alternative D2, 2,580 stream miles would not be offered for lease sale under Alternative D2. Additionally, a total of 640 miles of streams would be subject to NSO stipulations (46 percent less than Alternative B), 10 miles stream subject to TL, and another 140 miles of stream subject to STC. In anadromous streams, approximately 100 miles would be subject to NSO, 0 miles subject to TL, and 0 miles subject to STC.

For lacustrine habitat, 9,600 habitat acres would be unavailable for lease sale, compared to 0 acres under Alternative B. There would be 8,600 acres of lacustrine habitat available for leasing but subject to NSO; there would be 0 acres subject to TL and 0 acres would be subject to CSU. A total of 200 acres of lacustrine habitat would be subject to STC, a 98 percent decrease compared to Alternative B (**Table 3-26**).

Alternative D2 would make 4,800 acres of deep lake habitat unavailable for lease sale. There would be 5,600 acres of deep lake available for lease but designated as NSO under Alternative D2, a 55 percent increase over Alternative B. There would be 0 deep lake acres designated for lease sale subject to TL, with 0 acres subject

to CSU and about 100 acres subject to STC (**Table 3-27**). Under Alternative D2, 43,300 acres of total ice road extent is possible from liquid water source lakes in high oil potential areas available for lease (subject to STC) (see **Appendices I and K, Table K-8, and Map 3-14 in Appendix A**).

As described in Lease Stipulation 1, under Alternative D2, 29 streams and rivers would be subject to NSO setbacks, although a one-time exception could be granted by the BLM Authorized Officer in coordination with the USFWS to allow essential roads and pipelines to cross through these setback buffers, as well as gravel mines, if they do not support resident, anadromous, or endemic fish populations. Setbacks for the Canning and Staines River and Aichilik River east of the Arctic Refuge boundary and the Sadlerochit Spring Creek floodplains would be 3 miles; setbacks for the Hulahula River floodplain would be 4 miles; setbacks for the Sadlerochit River, Jago River, and Itkilyariak Creek would be 1 mile from the active floodplain; 12 rivers would include 0.5-mile setbacks from the active floodplain; and, an additional 10 rivers and creeks would have 0.25-mile setbacks.

Transboundary Impacts

Marine and anadromous fish species using the program area would cross the international boundary, and changes in a species' population would have cascading ecological effects on other fish species in the area. As described above and in *Cumulative Impacts*, the alternatives that allow more development near aquatic habitats and more potential obstacles to movement would have more potential for population-level impacts on fish species across the international boundary.

These potential impacts would be most pronounced on anadromous species, such as whitefish (*Coregonid* spp.), which make frequent summertime use of nearshore marine habitats along the Beaufort Sea coast, including in the program area. For example, Arctic cisco spawn in Canadian waters but are transported as young-of-the-year to Alaskan waters, where they overwinter in the Colville River delta. They feed extensively in Beaufort Sea nearshore environments until they are sexually mature (approximately age 8). Upon reaching maturity, they return to their natal waterbodies in tributaries of the Mackenzie River in Canada (Moulton et al. 2010). Impacts on Arctic cisco (and other highly migratory species) in Alaskan waters can have population level impacts on the species in Canadian waters.

3.3.3 Birds

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on birds because a lease does not authorize any on-the-ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, project construction, and production and transportation of oil and gas in and from the Coastal Plain. Therefore, the analysis considers potential impacts on birds from on-the-ground activities. Leasing may also overlap with other exploration and production phases of ongoing activities. For example, pre-leasing seismic exploration could occur across the entire program area, and additional post-leasing seismic exploration could occur within any specific lease that may be issued.

Potential impacts of oil development on birds fall within four primary categories of effects: habitat loss and alteration, disturbance and displacement (including alteration of behavior), injury and mortality, and attraction of predators and scavengers (including both mammals and birds) to human activity or facilities, with

subsequent changes in predator abundance (Eberhardt et al. 1982; Truett et al. 1997; Burgess 2000; Stickney et al. 2014; McGuire et al. 2023). The season in which activities occur would either moderate or accentuate the effects on birds. Winter activities may have direct effects on some year-round residents (such as ravens and ptarmigan, American dippers near open running water, and gyrfalcons) and potentially golden eagles and snowy owls, whose presence may overlap with some winter activities. However, winter activities also may indirectly affect species using these areas during non-winter months through habitat alteration (e.g. through vegetation damage) or injury (e.g. from a winter contaminant release). Summer activities would affect breeding birds during the nesting, brood-rearing, molting, and fall migration-staging seasons, when many species are present in high numbers and potential population-level consequences of impacts are greatest.

Although many future activities, such as vehicle traffic, would occur during exploration, construction, and operations of a development project, the potential intensity of impacts on birds differs among phases. Seismic exploration and exploratory drilling occur during the winter and would not directly affect non-resident birds. Indirect effects to non-resident birds may include habitat alteration due to slow melting ice roads, damage to tundra and vegetation from exploration vehicle traffic, as well as impacts on habitat quality from water withdrawals used to construct ice infrastructure, and injury from a possible contaminant release.

Habitat loss and human-caused disturbance and displacement would occur from road and facility construction. This would happen during the construction phase, which involves the largest number of people, temporary construction camps, and the highest levels of vehicle, machinery, heavy-haul equipment, and aircraft traffic. Most habitat loss would occur during construction, including the building of ice roads to support gravel extraction, gravel hauling, gravel road and pad construction, bridge construction, and pipeline construction.

Indirect effects could occur throughout the life of the proposed action; possible indirect effects are changes to permafrost dynamics, erosion, alteration of vegetation communities, hunting and recreation access, changes to predator dynamics causing changes in bird habitat and disturbance levels, and contaminant effects on prey populations leading to population declines or making prey unsuitable, particularly for feeding young.

The exploratory drilling phase of a development project would require less personnel and traffic than during early construction but would involve still higher (but localized) levels of activity than during operations or production. Air traffic and vehicle traffic would peak during construction and drilling, because personnel numbers peak during construction and materials transport during drilling. Traffic rates would be lower during the production phase. Future barging and in-field transport of CPF modules would occur early in the construction phase of any development project and would also affect birds through habitat loss and disturbance.

Schedules of development projects in the program area are unknown, but foreseeable hypothetical scenarios indicate overlap of exploration, construction, and production or operation phases of potentially several different projects with different operators. In terms of impacts on birds, activities and areas affected would increase until the surface disturbance estimate of 2,000 acres—development roads, pads, and pits—is reached in years or perhaps decades after initial project construction. All tundra habitat-related disturbance impacts would, therefore, be long term or permanent; however, development activities likely would be dispersed in different parts of the area available for lease over that period. The abandonment and reclamation phase would follow the production phase, when wells, pads, and roads associated with particular project sites have been retired and reclamation activities undertaken. Reclamation activities would also disturb and displace birds, such as from vehicle traffic and heavy machinery, but probably at lower levels than during other phases. Eventually, reclamation would result in the restoration of some habitat values for birds.

For most actions, potential impacts can be described only qualitatively, either because resource and impact data are unavailable or because project-specific details are uncertain or unknown at the time of this preliminary analysis; however, for some habitat impacts, semiquantitative estimates of areas affected are possible, with some assumptions regarding the likely configuration of a development project.

Potential direct effects resulting from future on-the-ground actions on avian habitats would occur in the gravel mining and gravel fill footprint, whereas indirect effects on habitat would occur at varying distances, depending on the source. Fugitive dust, gravel spray, thermokarsting, and impoundments may affect soils and vegetation up to 328 feet from roads and pads (see **Section 3.3.1**, Vegetation and Wetlands). Bird disturbance and displacement could occur over a larger area. When estimating the incidental take of spectacled eiders that would be caused by the construction and operation of oil field infrastructure, the USFWS considers the direct loss of habitat due to gravel mining and the placement of gravel fill, plus indirect loss in an adjacent zone of influence (estimated to be 656 feet wide), where disturbance could prevent spectacled eiders from nesting. Implicit in this method of estimating impacts is the assumption that displaced pairs would not move and nest successfully elsewhere, which has not been shown.

Using a conceptual 750-acre layout of a stand-alone oil development facility (see **Appendix C**),⁵ the BLM examined the area within 328 feet (6,607 acres) of the facility to estimate the extent of indirect impacts on habitat due to dust fallout, gravel spray, thermokarsting, and impoundments. It also examined the area within 656 feet (11,820 acres) of the facility to estimate the extent of behavioral disturbance and displacement (see *Construction: Road Traffic and Human Disturbance* under *Impacts Common to All Action Alternatives*, below). Using these standardized footprints and extrapolating to a 2,000-acre maximum footprint, the BLM estimated the maximum additional total acres indirectly affected by habitat alteration (17,600 acres, about 8.8 times larger than the gravel footprint) and by disturbance and displacement (31,600 acres, about 15.8 times larger than the gravel footprint). Because the size of the estimated development footprint varies by alternative, the area affected by habitat alteration, the magnitude of bird disturbance and displacement also varies by alternative. However, the magnitude of disturbance and displacement (i.e., the numbers of birds disturbed and displaced) cannot be quantified due to a lack of available and suitable data.

These estimated areas of potential indirect habitat alteration and direct disturbance are intended to be conservative, with the area of potential effects overestimated for birds. However, the effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential indirect impacts of habitat alteration.

Alternative A

Under this alternative, current management actions would be maintained, and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). No direct or indirect impacts on birds from oil and gas activities would occur under Alternative A.

Impacts Common to All Action Alternatives

The following project phases, actions, and types of potential effects would be common to all action alternatives, but the avian resources affected (e.g., total area, specific habitats, bird species, and bird densities) would vary based on the location of facilities in each action alternative.

⁵One CPF and 6 radiating 8-mile access roads to 6 drill pads, including an STP pad and a 30-mile access road, totaling 750 acres

Exploration: Winter Seismic Surveys

Under all action alternatives, winter seismic exploration would result in temporary and potentially some longer-term alteration of avian habitats (see **Section 3.3.1, Vegetation and Wetlands**). Potential seismic exploration impacts (which could also occur in the pre-leasing period) include direct compaction of snow and vegetation, delayed snowmelt along seismic lines, damage to taller tussock and low shrub tundra in seismic tracks, and possible disturbance to overwintering bird species. Degradation of avian habitats by winter surface activities would be minimized under all action alternatives by ROP 11, which sets standards for winter tundra travel. Moist vegetation types such as moist tussock tundra, the most widespread avian habitat in the program area, moist sedge-willow tundra, and moist sedge-Dryas tundra are more sensitive to the physical damage caused by tundra travel and ice roads than are wet or dry vegetation types such as wet sedge tundra, riparian low shrub, and dry dryas river terrace (Raynolds et al. 2020).

Significant reductions in the abundance of four passerine species were found along visible, old (10 to 35 years old) seismic lines in both upland tussock tundra and low-center polygon habitats (Ashenhurst and Hannon 2008). Passerine abundance was also reduced along seismic lines less than 1.5 years old but only when species were combined in the analysis. The sample sizes in this study, however, were small due to low bird abundance and a low number of seismic lines, which may have affected the authors ability to detect biologically relevant differences even if they were present. Additionally, old lines may have more of an impact because they were created using different methods and practices than new lines, or possibly because adverse alterations to vegetation communities resulting from seismic lines take a long time to develop. For example, thermokarsting and the resulting increases in surface water may require years or decades to develop or to stabilize. Clear long-term changes to microtopography and vegetation structure and plant species composition from seismic exploration may affect the abundance and composition of bird communities. These effects would be greatest in drier upland habitats, in areas of higher microrelief, such as stream banks and ravines, and in tussock and shrub vegetation types (Jorgenson et al. 2010; Walker et al. 2019).

Under all alternatives, several use and mitigation plans would be required of lessees, operators, and/or contractors prior to commencement of any exploration or development activities. Under all alternatives, Lease Stipulation 9 would protect nearshore marine waters, lagoons, barrier islands, coastlines, and their value as bird habitat and prevent loss or alteration of important bird habitat by requiring the lessee, operator, or contractor to develop and implement an impact and conflict avoidance and monitoring plan.

Additional protections of birds and bird habitat would be provided by ROP 2 which requires all lessees, operators, and contractors to prepare and implement a comprehensive waste management plan for all phases of exploration (including seismic activities), development, and production. This plan would have to describe steps that would be taken to minimize predator attractants through the use of bear-resistant waste containers and proper disposal of rotting, human, and pumpable waste. Discharges or disposal of wastewater into bodies of fresh, estuarine, and marine waters, including wetlands, would be expressly prohibited.

ROP 19 prohibits temporary exploration camps on frozen lakes and river ice and also requires any trailer modules to be blocked to avoid negative impacts on vegetation. This protects water quality and lacustrine habitats and food sources important to waterbirds such as loons and shorebirds.

ROP 25 prohibits the feeding of wildlife and allowing wildlife to access human food or odor-emitting waste and ROP 2 requires rotting waste be handled and disposed of in a manner that prevents the attraction of wildlife (e.g., incineration). These ROPs would help reduce habituation of wildlife to human activities during seismic work and help reduce the attraction of predator species, which can result in reduced nesting success of birds during the subsequent summer seasons.

Exploration: Air Traffic Disturbance

During the early phases of exploration, air traffic noise, visual disturbance, and human disturbance on the tundra from helicopter support activities and overflights would result in the direct displacement of birds from areas adjacent to helicopter landing zones.

Helicopter flights could occur in winter in support of seismic exploration, and in summer to support pre-construction environmental and civil engineering survey work. These disturbances would be infrequent (short term) and localized geographically in extent and are unlikely to result in detectable population-level impacts on birds. Additional information on helicopter disturbance to birds is provided in the *Construction: Air Traffic Disturbance* and *Production: Air Traffic Disturbance* sections below.

Regarding air traffic disturbance during exploration, ROP 34 seeks to minimize the effects of low-flying aircraft on wildlife by requiring submission of an aircraft use-plan prior to any oil and gas exploration or development. Aircraft operation over snow goose staging areas would be prohibited between August 15 and September 30. Altitude restrictions and landing restrictions meant to reduce disturbance to polar bears and caribou could also reduce disturbance to birds and bird habitat as the restrictions would also reduce the number of landings in bird habitat.

Exploration: Water Withdrawals for Ice Roads and Pads

When compared to northeastern NPR-A, water resources are relatively limited in the ARCP and large water withdrawal volumes to support exploration activities (e.g., ice road and ice pad construction) could have adverse impacts on nesting and brood-rearing habitats of many species of waterbirds, including bird species that rely on lakes and wetlands such as shorebirds, waterfowl, and loons. Drawdown of water-source lakes may change water quality and reduce the abundance of foods on which birds rely and lower water levels could eliminate important nesting sites on islands and peninsulas.

In the exploration phase of any future project on the ARCP, water for ice roads and pads would likely be withdrawn annually. Drawdowns are expected to be made for the development of an annual ice road between the program area exploration infrastructure and the existing support infrastructure in Deadhorse and Prudhoe Bay. Water withdrawals are therefore likely to affect large numbers of waterbirds, with many waterbodies affected annually, beginning with the first proposed development project and continuing through the 85-year analysis time frame. Other drawdowns would occur for shorter periods during specific project exploration activities. Effects could be short term in some waterbodies, but long-term effects are also likely to occur and may be widespread considering the low surface water abundance in the ARCP.

Under all action alternatives, ROP 8 would prohibit unfrozen water withdrawal from springs, rivers, and streams during winter, though ice aggregate removal may be authorized on a project-specific basis. ROP 9 would establish limits on water withdrawal (percent of calculated volume) and other standards for withdrawals from lakes and ponds that specifically protect bird nesting sites and fish. Despite these restrictions, water withdrawals could exceed the natural recharge rates, resulting in lower long-term water levels (see **Section 3.2.10**, Water Resources). Few lakes have been surveyed in the ARCP, so the distribution of fish-bearing lakes is unknown. Under-ice water withdrawals could affect water chemistry and turbidity and possibly result in fish mortality and impacts on aquatic invertebrate communities (see **Section 3.3.2**, Fish and Aquatic Species). The resulting decrease in fish abundance would make such lakes less valuable for Pacific loons. Lower invertebrate abundance or a downward shift in invertebrate diversity may affect the quality of ponds as a food source for birds in general, particularly waterbirds and shorebirds. The long-term loss of nesting

sites on lakes would have potential local population consequences for Pacific and red-throated loons and some waterfowl species (yellow-billed loons in the Arctic Refuge nest primarily outside of the program area).

Exploration: Ice Placement for Ice Roads and Pads

During exploration drilling activities, direct alteration of bird habitats would occur from the placement of ice for ice roads and pads, and indirect effects of alteration in spring surface water runoff also would occur. Ice road alignments are unavailable for calculating potential areas affected, but proposed use of ice roads would be extensive under all action alternatives, including an annual ice road between the program area and the Prudhoe Bay/Deadhorse road system. Under all action alternatives, Lease Stipulation 4 would prohibit exploratory well drill pads within the nearshore marine waters, lagoons, and barrier islands of the Coastal Plain.

Ice roads and pads can interfere with natural drainage of spring runoff; additional habitat alteration can occur through vegetation damage, including reduced live and dead cover due to crushed standing plant cover, stem and blade breakage, compaction, freezing, and physical damage (see **Section 3.3.1**, Vegetation and Wetlands). Although recovery of sedges, grasses, and forbs may occur in two to three growing seasons (Pullman et al. 2005), tussocks and woody shrubs often take longer to recover (Yokel et al. 2007). Vegetation damage is most severe and takes longer to recover in well-drained areas, including moist tundra and shrub habitats, which support higher densities of passerines, ptarmigan, and some shorebirds, such as whimbrel and American golden-plover. In contrast, aquatic and wet tundra habitats, which are favored by most waterbird species (Derksen et al. 1981; Johnson et al. 2003, 2005, 2007), generally are damaged less by ice roads and recover more quickly (Guyer and Keating 2005; Pullman et al. 2005; Reynolds et al. 2020). Ice roads and ice pads are denser than the surrounding snow cover, resulting in a longer melting time in spring. This delayed melt may make these areas unavailable for nesting birds, which often initiate nests well before complete snowmelt, and would also shorten the growing season for the underlying vegetation, which may make these areas less attractive as foraging habitat for birds during the summer following ice infrastructure construction. Bird habitat alterations from ice roads and pads are likely, and their impacts on bird abundance and community compositions would be short to long term, depending on the types of vegetation affected and whether ice road routes and pad sites are reused in multiple years.

Exploration: Use and Storage of Hazardous Materials

During seismic surveys and exploration drilling, direct injury and mortality of birds could occur from accidental releases or discharges or insecure containment of hazardous materials.

During seismic exploration, the primary potential mechanism for contaminant release would be from accidental fuel spills from vehicles, storage tanks, aircraft, and equipment during transport or fueling. Such spills would be medium to small (see **Section 3.2.11**, Solid and Hazardous Waste) and would continue to be the most common types of spills for any future development project. Most small spills would involve refined oils and fuel, antifreeze, or saline water used in hydrostatic testing.

During exploration drilling, there would be a risk of having a large or very large crude oil spill (see **Section 3.2.11**) due to a well blowout (shallow gas or reservoir). Although the risk of spills would be reduced in the NSO areas designated under each alternative, the frequency of spills would not differ. Under all action alternatives, setbacks from rivers and streams (Lease Stipulation 1) would provide some protection from accidental fuel spills for important avian habitats in riparian and delta habitats, although all action alternatives include exceptions for essential pipelines, roads, and gravel mines. Spills in water would be more difficult to contain, but important coastal and lagoon habitats for migratory birds are identified as NSO under all action

alternatives (Lease Stipulation 4 includes an exception for barge landings). This would reduce the potential area that would be affected by spills in the coastal and nearshore marine environment.

Under all action alternatives, ROPs 1 and 2 would minimize the generation and hazards of hazardous waste. ROP 3 would provide protection from some types of fuel spills for avian habitats associated with waterbodies and in riparian areas (fueling equipment and fuel storage over 210 gallons would be prohibited within 100 feet of the active floodplain of any waterbody; see exceptions). ROPs 16 and 19 would reduce the likelihood of fuel or other spilled materials in fish-bearing waterbodies, which are important to some species of birds.

The likelihood of very small or small spills occurring would be high, the likelihood of medium-sized spills would be medium, and the likelihood of large and very large spills occurring would be low to very low. Although large and very large spills are uncommon, they could occur—six spills larger than 100,000 gallons have occurred on the North Slope (see **Section 3.2.11**, Solid and Hazardous Waste). Most spills would be smaller than 100 gallons and would be contained on ice roads and pads, though some spilled material may still extend off road or pad and reach the adjacent tundra. When spills do reach the tundra, they typically impact less than 5 acres (BLM and MMS 1998). Spills or accidental releases that occur during exploration activity would occur during winter when the surrounding tundra is covered in ice and snow, which would provide opportunity to remove the contaminants and remediate the area before the contaminants seep into the environment. However, depending on event timing (i.e., end of the ice road season), some contaminants may not be removed before breakup arrives and bird habitat could be impacted. Additional impacts on habitat could occur from tundra-based remediation activities (e.g., tundra disturbance from equipment operation).

Construction: Water Withdrawals for Ice Roads and Pads

During the construction phase, water withdrawals from lakes would continue to be needed to support ice road and pad development necessary for transporting equipment and materials. The limits on the availability of freshwater resources on the ARCP and the indirect effects on bird habitats would be the same as described above under *Exploration: Water Withdrawals for Ice Roads and Pads*. Drawdowns of water from lakes would continue annually for the duration of the construction phase, and this would include drawdowns for the development of an annual ice road between the ARCP infrastructure and the existing support infrastructure in Deadhorse and Prudhoe Bay.

Construction: Marine Water Withdrawals and Discharges

Using marine water at a STP to develop additional freshwater resources during the construction phase would involve water withdrawals and discharges after treatment. Impacts on waterbirds and shorebirds would mostly be indirect through the alteration of aquatic habitats from increased salinity of discharged waters (see **Section 3.2.10**, Water Resources). These local area increases in salinity in mixing zones could negatively affect the abundance of fish and marine invertebrates consumed by birds (see **Section 3.3.2**, Fish and Aquatic Species) but could also affect waterbirds and shorebirds directly, possibly through avoidance of areas of greater salinity. Potential injury or mortality of the fish prey of waterbirds at seawater intake areas is also possible (see **Section 3.3.2**, Fish and Aquatic Species).

To our knowledge, the effects of local-area increases in salinity on waterbirds and seabirds in marine and coastal habitats in the Arctic have not been studied, but applicable research on saline exposure and waterfowl species that occur on the Coastal Plain has been conducted elsewhere (DeVink et al. 2005 and Stolley et al. 1998 as cited in Hollmen et al. 2023). Hollmen et al. (2023) conducted an experiment on spectacled and Steller's eider ducklings in captivity and found that exposure to saline water at concentrations of 6 ppt reduced growth in ducklings exposed after one week of age. Graff (2021) and Hollmen et al. (2023) studied breeding

spectacled eider use of coastal wetland habitats at varying salinity levels and found no correlation between salinity and habitat use by foraging eider broods. It is expected that effects of salinity increase would be long-term covering the duration of use of the STP but their localized nature would limit the population level effects on molting waterbirds and waterbirds and shorebirds staging for migration in the coastal lagoons in the program area.

Construction: Ice Placement for Ice Roads and Pads

During construction activities, ice roads and pads would continue to be needed for transporting equipment and materials. The direct effects of alterations in bird habitats from the placement of ice roads and pads during construction would be the same as described above under *Exploration: Ice Placement for Ice Roads and Pads*. Ice road and ice pad development would continue annually for the duration of the construction phase, and this would include the annual ice road between the ARCP infrastructure and the existing support infrastructure in Deadhorse and Prudhoe Bay.

Construction: Use and Storage of Hazardous Materials

During the construction phase, direct injury and mortality of birds could occur from accidental releases or discharges or from the insecure containment of hazardous materials. Oil spills and other releases of contaminants pose well-documented risks of injury or death to birds and their eggs (NRC 1985, 2003). Feather oiling may result in bird death via hypothermia, starvation, drowning, or a combination of the three (Leighton 1993). Birds may ingest oil by consuming contaminated foods or preening oiled plumage, which can result in stress responses (i.e., changes to adrenal function), reduced reproduction (changes in reproductive hormones, altered egg structure, and changes to nesting behavior), and destruction of red blood cells. In experiments, ducks exposed to low concentrations of Prudhoe Bay crude oil on water transferred contamination to their eggs (Albers 1980); eggs exposed to even minute quantities of crude or fuel oil had markedly reduced hatchability and increased prevalence of diseased embryos (Albers and Szaro 1978; Szaro et al. 1978; Couillard and Leighton 1991). In addition to direct mortality (Piatt et al. 1990), spills can have long-term toxicological effects with direct and indirect effects on avian reproduction and habitat use (Szaro 1977; Wells et al. 1995). Spills also affect birds indirectly, through changes in habitat and food supply and by exposure through the food chain.

The likelihood of very small or small spills occurring would be high, the likelihood of medium-sized spills would be medium, and the likelihood of large and very large spills occurring would be low to very low. Most spills would be smaller than 100 gallons and would be contained on gravel roads and pads, though some spilled material may still extend off road or pad and reach the adjacent tundra. When spills do reach the tundra, they typically impact less than 5 acres (BLM and MMS 1998), but they could kill birds or affect numbers of nesting, foraging, or loafing birds in the area, depending on location and timing. Habitats affected by such spills are subject to short-term or long-term alteration, depending on the type of spill and rehabilitation required.

Although large and very large spills are uncommon, they could occur—six spills larger than 100,000 gallons have occurred on the North Slope (see **Section 3.2.11**, Solid and Hazardous Waste)—and such spills could pose substantial risks to migratory birds and their habitats, depending again on location and timing. Large spills may take days to weeks to clean up and could pose contamination and disturbance risk to large numbers of molting, feeding, or migrating birds (NOAA 2002). Large spills from blowouts, if not contained in a timely manner (see below), could reach rivers and streams and the nearshore lagoon system. Spill containment at strategic points on waterways would likely prevent oil from flowing downstream into lagoons; however, if oil escaped containment efforts during the migration staging period, large spills could result in a large number of

birds killed and could possibly even have population-level impacts on subspecies of waterbirds and/or shorebirds.

The risks of spills (including from drilling activities that would overlap with the construction phase) and the Lease Stipulations and ROPs that would be in place to minimize the impacts of spills are discussed above under *Exploration: Use and Storage of Hazardous Materials*. This section discusses the additional spill scenarios that could occur during a development's construction phase.

Activity in or next to the shore of Camden Bay for construction of a STP and barge landings and annual barge traffic (two barge transports per year are anticipated), would increase the risk of medium to large fuel spills in the nearshore marine environment and along the barge route. The risk of spill occurrences would increase with increased levels of human activity during construction. Fuel spills in the marine environment during construction and use of docking facilities and the STP in Camden Bay may affect birds. Most fuel spills would be medium to small, would occur during the mid- to late-summer open water seasons, and would be localized to areas at the STP and docking facilities, assuming adequate response and containment.

Barge traffic would also increase the risk of fuel spills along the marine transport route (**Map 3-30 in Appendix A**). Waterbirds and shorebirds migrating along the coasts of the Beaufort and Chukchi seas and seabirds that breed and forage in the region of the marine transport route may be particularly vulnerable to spilled oil that reaches the marine environment. Spills along the marine transport route along the west coast of Alaska could affect critical habitat for Steller's and spectacled eiders. Medium to very large spills in the ocean would be possible in the event that a vessel runs aground and its fuel tanks or containment compartments are breached. This could occur in the shipping lanes leading to the docking or STP pads, similar to the Kuroshima oil spill, which killed many hundreds of birds on Unalaska Island in November 1997 through March 1998; cleanup activities for that spill lasted through summer 1999 (NOAA 2002). The marine transport route would cross the Beaufort Sea Lagoons Key Site and be within 20 to 425 miles of the Ledyard Bay, Northern Bering Sea, Norton Sound, Yukon-Kuskokwim Delta, Kuskokwim Shoals, Nushagak and Kvichak bays, Seal Islands, Nelson Lagoon, and Izembek Lagoon Key Sites (Bowman et al. 2022). An oil spill adjacent to these key breeding, molting, wintering and/or staging habitats would impact all 4 species of eiders, long-tailed ducks, and black scoters, surf scoters, and white-winged scoters.

Construction: Gravel Mining

During the construction phase, gravel mining for the construction of roads and pads would result in direct habitat loss for birds; direct changes in surface water drainage patterns and flow (including blockages); and indirect habitat alteration from drifted snow, thermokarsting, gravel spray, and fugitive dust adjacent to gravel mining areas.

During construction, gravel would be mined during winter at several unidentified material sites and transported over gravel roads or ice roads or both. Bird habitats in these areas would be lost. Reclamation would consider the potential use of gravel pits for enhancing fish and wildlife habitat. Some pits remaining from excavation would be used as water sources for ice road and pad construction, which could reduce the impact of other sites being developed for water withdrawal. The original avian habitats would be permanently lost to material sites, but rehabilitated sites would likely be used by some species of nonbreeding, breeding, and brood-rearing waterbirds. The impact on birds would be long term.

Under all action alternatives, several lease stipulations and ROPs would minimize the impact of mineral materials mining on wildlife, including birds. ROP 24 would require design, construction, and reclamation of gravel mines to avoid serious impacts on active floodplains, though protections vary by alternative. ROP 30

would minimize the loss of nesting habitat for cliff-nesting raptors by prohibiting the removal of more than 100 cubic yards of material from cliffs or from an active riverine channel, unless studies indicate no effects on adjacent bluffs.

Because the indirect habitat alteration effects of gravel mining in areas adjacent to material sites would be similar to those adjacent to gravel roads and pads, those effects are discussed below under *Construction: Gravel Placement for Roads and Pads*. The primary difference would be that the indirect impacts of gravel mining would be less pronounced and short-term whereas those effects would be long-term and of greater magnitude in areas adjacent to gravel roads and pads.

Construction: Gravel Placement for Roads and Pads

Similar to the effects of gravel mining, the gravel placement for roads and pads during construction would result in direct habitat loss for birds, direct changes in surface water drainage patterns and flow (including blockages), and indirect habitat alteration from drifted snow, thermokarsting, gravel spray, and fugitive dust adjacent to gravel roads and pads. Potential effects on birds in general from the direct loss of habitats in gravel road and pad footprints would be minimized by reducing footprint sizes in wetlands as much as possible, where breeding densities are generally highest (Bart et al. 2012). Instead, road alignments and pad sites would be preferentially selected in uplands and better-drained moist tundra habitats, including abundant tussock tundra. Such habitats are important to land birds, such as passerines and ptarmigans, and to some species of waterbirds and shorebirds (Bart et al. 2012) and impacts on these species could be greater as a result.

ROP 45 provides protection for birds and other wildlife designated as Sensitive Species by the BLM. Prior to any proposed development in areas that contain potential habitat for BLM Sensitive Species, a development proponent must conduct appropriately timed surveys for Sensitive Species and submit results and plans to minimize impacts on the BLM Sensitive Species in conjunction with a development application.

Impacts on river deltas and nearshore marine habitats and food sources, which are heavily used by waterbirds and shorebirds, would be reduced under all action alternatives by Lease Stipulation 4. Additionally, ROP 19 would prohibit permanent facilities within 500 feet of fish-bearing waterbodies (see exceptions), which would protect those habitats and birds using those habitats. Similarly, the construction of causeways and docks would be prohibited in river mouths and deltas, and permanent structures in marine environments would be constructed to prevent significant changes to nearshore oceanographic circulation patterns and to ensure free passage of fish (ROP 20).

Habitat alteration caused by fugitive dust, thermokarsting, and water impoundments intensifies with time. As dust and gravel spray accumulate, vegetation is slowly affected, and thermokarsting deepens or spreads. Dust fallout into wet and aquatic habitats also can mobilize contaminants specific to the geology of the pits where the gravel was mined. Thermokarst and resultant erosion can have similar effects on the mobilization of metals, including mercury (see **Section 3.3.2**, Fish and Aquatic Species), with potential adverse effects on birds foraging in these areas and their prey (fish and invertebrates).

Potential indirect habitat modification would result from fugitive dust (i.e., dust shadow) and gravel spray, changes in surface water drainage resulting in impoundments and vegetation desiccation, thermokarsting, and delayed melt of snow in snow drifts or berms created by snow removal. Fugitive dust would generally affect the largest area, extending as much as 328 feet from gravel roads (see **Section 3.3.1**; Walker and Everett 1987).

Using the 750-acre conceptual layout of a stand-alone oil development facility (**Appendix C, Figure C-1**), the area within 328 feet for impacts of dust fallout, gravel spray, thermokarsting, and impoundments was estimated to be about 6,607 acres. The actual area that would be affected would depend on the project-specific configuration of gravel roads and pads; however, these numbers indicate that indirect impacts of gravel roads, gravel pads, and material sites would affect an area about 8.8 times larger than the total project footprint. Under all action alternatives, potential loss or alteration of habitat from direct effects of gravel deposition and indirect effects of dust, thermokarsting, and impoundments would be long term. They would occur over about 19,600 acres (2,000 acres total footprint plus approximately 17,600 acres within 328 feet), or about 1 percent of the program area (1,563,500 acres).

Direct and indirect habitat alteration displaces individuals from locations where they might otherwise nest. Shorebird densities are lower near roads and gravel pads than at distant sites, although there is also evidence that nest densities of shorebirds are higher in the dust shadows of roads, likely because those areas can be free of snow earlier in the nesting season (NRC 2003). Some individual shorebirds and passerines whose nest sites were covered by gravel over the winter, have been shown to be displaced to adjacent similar habitats in subsequent nesting seasons (Troy and Carpenter 1990; Johnson et al. 2003). The impact of displacement on population dynamics is uncertain, but direct and indirect impacts of habitat loss and alteration from gravel placement would not be anticipated to affect population sizes of any bird species.

Potential future construction of gravel pads and roads would result in long-term direct loss of habitat and indirect alteration of adjacent habitat. Direct losses from gravel coverage would last as long as development projects are active, or until gravel is partially removed from retired roads and pads to restore some habitat functions.

Construction: Barging of Materials and Modules

The barging of materials and modules in marine waters during construction would result in direct disturbance and displacement of waterbirds and shorebirds from nearshore habitats, and potential direct alteration of aquatic foraging habitats by open water dredging.

For any development project in the program area, barging would be required during construction to transport modules to Camden Bay. This would disturb and/or displace birds in the nearshore marine environment. The potential for disturbance and displacement of birds is greater between early July and late September, when many waterbird species use the nearshore and lagoon waters of the Beaufort Sea, which attracts them because of its shallow water for feeding and protection from wind and waves (Flint et al. 2004).

The species most likely to be affected by nearshore barge activity is the long-tailed duck. The USFWS conducted nearshore sea duck and loon surveys across the Arctic coast of Alaska in late July/early August 2002 and 2003 (Lysne et al. 2004); the majority of birds recorded in ARCP lagoons were long-tailed ducks, 12,000 (92 percent) in 2002 and 27,965 (95 percent) in 2003. Sixteen percent of long-tailed ducks observed across the entire coasts of the Beaufort and Chukchi seas occurred in ARCP lagoons in 2002 and 29 percent in 2003. Those surveys were timed to coincide with peak numbers of molting long-tailed ducks, but other species were also reported.

The next most common species recorded were common eider (199 in 2002, 327 in 2003), surf scoter (308 and 381), and scaup (79 and 434). For other species, fewer than 150 individuals were recorded in either year, including king eiders, northern pintail, Pacific loons, red-throated loons, and yellow-billed loons. Lysne et al. (2004) reported that a substantial portion of yellow-billed loons, red-throated loons, scaup, and Pacific loons

counted during the entire Alaska North Slope survey occurred along the Arctic Refuge coast during some years.

Barging would involve slow-moving vessels (7 knots for barges) and would produce noise and visual disturbance. Boat operations for other activities may also occur. Common eiders, which may be on nests into late July, and other birds that nest on barrier islands may be disturbed by barging, if barging occurs during the nesting period.

Schwemmer et al. (2011) reported ship traffic affected flight reactions in sea ducks and the distribution of loons. Johnson (1982) reported displacement of long-tailed ducks in response to aircraft, boats, and human disturbance. Flint et al. (2004) reported that molting long-tailed ducks using lagoons in the Beaufort Sea had low and variable fidelity to sites inside barrier islands, averaging 39 percent. Sites were occupied consistently, but turnover of individuals was high as flightless ducks moved among sites. Site fidelity was not clearly affected by seismic surveys and little evidence was found for disturbance-related displacement of individuals (Flint et al. 2004); aerial survey data did not indicate a difference in density of long-tailed ducks between industrial and control sites (Fischer et al. 2002).

Potential benthic habitat loss and behavioral disturbance and displacement of birds by barging vessels and associated vessel activity would occur annually in a relatively small, localized area. There may be other boating activities also; those would be short-term events, but they may occur over a broad area and for the duration of a development project. Periodic disturbance and displacement from the Camden Bay landing site is not anticipated to result in population-level effects on any bird species. Additional low levels of disturbance and displacement of waterfowl and seabirds could occur along the marine vessel transit route between the ARCP and Dutch Harbor, Alaska.

Open-water dredging could result in both temporary and long-term loss of benthic feeding habitat for waterbirds in the coastal lagoons in the program area. Birds could be displaced during dredging and the habitat loss effects would be localized to dredging and spoil areas.

Several lease stipulations and ROPs would provide protection for marine birds and their habitats along the marine vessel transit route and in nearshore marine areas. Lease Stipulation 4 protects nearshore marine habitat. ROP 46 would minimize vessel traffic impacts on marine mammals but may provide protection for waterbirds that feed in marine habitats in the spring by prohibiting vessel transit before July 1. Requirements for the retention of trash and minimization of hazmat spills under ROP 46 would also protect marine birds.

Construction: Road Traffic and Human Disturbance

During the construction phase, traffic on ice and gravel roads and pads would result in the direct displacement of birds from roadsides due to noise and human disturbance. Additional indirect alteration of bird habitats along gravel roads and pads that could cause displacement would occur from drifted snow, thermokarsting, gravel spray, and fugitive dust. Because these indirect effects on habitats are more directly related to gravel placement than road traffic, they are discussed above under *Construction: Gravel Placement for Roads and Pads*.

Gravel transport and placement and pipeline construction would take place in winter from ice roads in the early construction phase and, after initial construction, from existing gravel roads. Winter activities, including ice road placement, gravel mining, and transportation, would occur annually throughout the exploration, construction, and production phases of any future development project; however, traffic levels and activity would decrease after the construction phase to relatively low levels during production. During all project

phases, winter activities would cause disturbance, behavioral alterations, and displacement to small numbers of resident wintering birds. The indirect effects of winter activities on bird habitats are discussed above under *Exploration: Ice Placement for Ice Roads and Pads*. In the event that ice road use is permitted into April, some early arriving breeding birds could also be affected, primarily golden eagles and snowy owls.

Construction activities during summer would occur on gravel roads and pads, which could cause short-term behavioral changes or displacement of breeding birds in adjacent habitats. Summer construction would involve gravel grading and compacting, module and pipeline hookups, and construction of the camp, operations center, and CPF. Summer construction would have higher levels of machine, heavy equipment, and vehicle traffic and more human activity than during production drilling and operations, resulting in higher rates of disturbance-caused behaviors and displacement of birds.

Many types of human activities in bird habitats would result in either disturbance or displacement of birds. The impact of disturbance refers to behavioral and potential physiological reactions to perceived disturbing stimuli, which may be visual or aural. Displacement occurs when the individual moves to another site or area that is free from the disturbing stimulus. For example, alert postures, concealment postures, and escape all are potential behavioral reactions and may or may not be accompanied by changes in heart rate, endocrine states (including stress), and increased energy expenditure. For nesting birds, displacement is less available as an option than it is for non-nesting birds that are not behaviorally attached to a nest site. The consequences of displacement are greater for breeding birds, however, because it leads to the abandonment and failure of the nest.

Noise pollution can affect birds in many ways, although anthropogenic noise is almost always associated with other confounding disturbance variables, such as visual and physical disturbance. Short duration but very loud sounds can damage birds' ears, although, unlike mammals, birds can regenerate sensory hair cells to some extent (Niemiec et al. 1994). Chronic stress from disturbance may cause physiological responses, including elevated heart rate, reduced immune response, and decreased reproductive success, although little is known about these responses outside of the laboratory (Ortega 2012).

Avoidance may be the most common response to noise, although many bird species are tolerant of noise and readily habituate to many types of disturbance (Ortega 2012). For example, simulated gas compressor noise was found to have no measurable effects on nest density or reproductive success of longspurs (Gollop et al. 1974b); nevertheless, tundra camp activity, including aircraft, personnel, and vehicle activity, may have affected reproductive success (Gollop et al. 1974c). In studies in New Mexico and the boreal forest in Canada, however, many passerines avoided gas compressor noise (Ortega 2012). Sound transmission lessens with distance, and the effects of loud stationary facilities on birds are localized.

Studies of waterfowl behavior in areas of high-density oil development in Prudhoe Bay, where some habituation to disturbance is likely, showed almost no effects of traffic level on habitat use or distance from roads for any species of geese or swans (Murphy and Anderson 1993); the exception was brant, which occurred farther from roads with high traffic levels during construction but not during post-construction production phases. Human activity, in contrast, is a consistently strong disturbance and people in the vicinity of nests typically cause incubating birds to flush and to remain off nests as long as people remained in the vicinity (Gollop et al. 1974a; Murphy and Anderson 1993).

Human-caused disturbance could cause behavioral changes in birds, ranging from alert postures to flush or flight behaviors (Murphy and Anderson 1993; Johnson et al. 2003; Livezey et al. 2016). At low activity levels (e.g., passing vehicle), disturbance could increase the occurrence of concealment postures, interfere with

resting and feeding activities, and increase energetic costs. At times with high activity levels (e.g., active drill site construction), escape behaviors could affect reproduction through increased absences from nests and nest abandonment, thereby increasing the likelihood of predation leading to nest failure (Uher-Koch et al. 2015; Stien and Ims 2015) or disintegration of broods and chick predation. Studies of bird responses to human disturbance in oil fields indicate that responses vary among species, by season and breeding status, by type of human disturbance, and by distance to the source of disturbance (Anderson et al. 1992; Murphy and Anderson 1993; Johnson et al. 2003, 2008).

As discussed previously, for assessment of potential effects of disturbance and displacement by road traffic, the area within 656 feet of roads, pads, and pipelines was used as a conservative estimate of the area affected by disturbance and displacement for all species of birds. This overestimates the area of disturbance for nesting shorebirds and passerines, which respond at very close distances (43 to 72 feet; Livezey et al. 2016); however, it likely underestimates the area for more sensitive birds, such as nesting tundra swans (at least 1,640 feet or more; Monda et al. 1994). Disturbance and displacement could affect nesting birds within 0.8 miles of active roads (Johnson et al. 2003). A review of literature on reported distances from various motorized and nonmotorized human activities, at which nesting birds initially respond and take flight, found all species studied reacted and flushed at mean distances of less than or equal to 656 feet, except for falcons, hawks, and eagles; these species reacted at greater distances to some disturbance types (Livezey et al. 2016). During fall migration, staging flocks may also be subject to disturbance and displacement, such as shorebirds in river deltas, molting long-tailed ducks and other birds in lagoons, and snow geese in tundra habitats.

Potential impacts of disturbance and displacement by summertime construction and operations would be long term and may affect nest density or nesting success for some birds near facilities; however, they are unlikely to affect regional or global population sizes of breeding birds. The most important indirect effects of road traffic and human disturbance on reproduction are increased exposure (i.e., exposure of adults to predators) and loss of eggs and nests to avian and mammalian predators.

Lease stipulations and ROPs under all action alternatives would help to avoid disturbing breeding birds, including nesting spectacled eiders. Tundra (ground-level) activities and other construction activities with high noise levels, such as fill placement and habitat alteration, would be prohibited within 656 feet of occupied spectacled eider nests from June 1 through July 31 (ROP 32). Clearance surveys would be required prior to any tundra activities during the nesting season. ROP 19 would prohibit permanent facilities, including roads, within 500 feet of fish-bearing waterbodies, and would reduce the potential for disturbing birds nesting or feeding in those lakes, ponds, or rivers.

Construction: Air Traffic Disturbance

During construction, air traffic noise, visual disturbance, and human disturbance on the ground for aircraft activities and overflights would result in the direct displacement of birds from areas adjacent to helicopter landing pads and/or project airstrips for fixed-wing aircrafts.

Air traffic forecasts are provided in **Section 3.4.9**. The effects of air traffic on the acoustic environment are discussed in **Section 3.2.3**. All types of air traffic could disturb and displace both breeding and non-breeding birds. Flight paths would depend on locations of project infrastructure, but air traffic supporting oil and gas development would include fixed-wing aircraft into the Deadhorse, Kavik, and Barter Island airports, and helicopters would move people and supplies from airports to sites in the program area. It is possible that additional landing strips would be built in the program area as well for fixed-wing aircraft. Potential impacts on birds would be widespread across the program area and would be both short and long term.

Disturbance and displacement by air traffic would occur during all phases of any future development project. Helicopter support would be important during the construction phase but may be much less important during production. Fixed-wing and commercial air traffic may similarly peak during the early construction period but then would level out in later construction and during the production phase with regular personnel transportation. However, because the development phases of different projects could overlap in the program area, air traffic in general is likely to continue to increase from current levels throughout the 85-year time frame of this analysis.

Under all action alternatives, helicopters would be used to support ice road layout, survey, summer cleanup, pre-positioning spill-response equipment, and biological surveys and monitoring associated with permit conditions. These activities usually take place in July and August, with daily helicopter traffic during that time, involving departures from the helipad and landings at various tundra locations. Helicopter flights during July and August would occur during nesting, brood-rearing and molting, and fall migration-staging periods for most of the species in the program area. Helicopter landings on tundra could cause displacement from nests and separation of broods, which could allow predators to take eggs or chicks and thus reduce reproductive output. As young grow and become more mobile or even flight capable, helicopter landings and low-level flights would cause escape movements or flight behavior and interfere with feeding and resting; however, such effects are usually very short term. The intensity of impacts of helicopter flights would vary, depending on number of landings on tundra, landing locations, and seasonal timing. Impacts would occur during all development phases and would be extensive in geographic scope.

Noise and air traffic could disturb and displace staging snow geese that visit the North Slope Coastal Plain in large numbers in late August and September of most years. As many as 325,760 snow geese have been documented using the ARCP, including the program area and east to the Canadian border, for several weeks, foraging for *Eriophorum* (cottongrass) in both coastal and upland habitats and building energy reserves needed for fall migration (Kendall 2006).

In a two-day experiment, simulated gas compressor noise appeared to decrease the numbers of staging snow geese within 3 miles (Gollop and Davis 1974), although some evidence of habituation was noted even over that short period. Snow geese are easily disturbed by aircraft and other human intrusions during staging, making them vulnerable to displacement. In experimental overflights, observers recorded flushing distances of staging snow geese on the North Slope of up to nine miles from passing aircraft and from overflights at altitudes up to 10,000 feet (Davis and Wisely 1974; Salter and Davis 1974).

In these short-term disturbance studies, mean distances of flushing for various types of overflights ranged between 1.2 and 2.5 miles and durations averaged between 5 and 6 minutes, depending on overflight category, such as aircraft and altitude; frequent disturbance was found to drive geese away from feeding sites. Boothroyd (1985) found similar results and found that staging snow geese were the waterfowl species in their area most sensitive to aircraft overflights. The primary concerns regarding disturbance of staging snow geese are decreased feeding time, increased energy expenditure, and displacement from preferred high-quality feeding areas. These all could affect their ability to accumulate adequate energy reserves to fuel their fall migration (Davis and Wiseley 1974) or could displace them to staging habitats east of the US-Canada border.

Aircraft overflights can temporarily reduce the numbers of waterfowl on lakes (Schweinsburg 1974), but nesting birds show variable reactions. For example, brant were observed to flush from nests in response to some aircraft overflights, while nesting common eiders were rarely observed to show any visible reaction in response to such activities (Gollop et al. 1974a). In industrial areas at Prudhoe Bay where some habituation to disturbance is likely, routine oil field activities, such as road traffic, noise, and aircraft flying at the

prescribed minimum altitude of 500 feet typically did not cause nesting geese to react (Murphy and Anderson 1993).

Under all action alternatives, ROP 34 would require flight altitudes above 2,000 feet within 0.5 miles of raptor cliff-nesting sites. Similar altitude restrictions plus minimizing helicopter landings from May 20 to June 20 for caribou calving range would temporarily reduce disturbance of nesting birds in some areas. Use of the Deadhorse airport, where traffic levels already are high and which is the primary hub for the North Slope oil industry, would increase both for passenger and freight flights. This would increase the potential to disturb birds, although birds in this area already experience high levels of disturbance. Additional use of the Deadhorse airport would add to disturbance levels locally, and potential impacts on birds would be long term. ROP 34 would also avoid operation of aircraft over snow goose staging areas between August 15 and September 30 to minimize potential noise and visual disturbance.

Construction: Bird Collisions with Vehicles, Aircraft, and Infrastructure

Vehicle and aircraft traffic and tall structures, including communication towers and drill rigs, pose collision hazards that could kill or injure birds. Collisions with tall structures increase with tower height, bright lighting, and the presence of guy wires (Manville 2005; Gehring et al. 2011). Such structures are particularly hazardous when located in flight corridors or in or adjacent to high-value habitats, such as wetlands (Manville 2005). Little information is available on rates of mortality or injury from collisions in the North Slope oil fields. Collisions with vehicles and aircraft would likely be more frequent with increased bird densities and traffic rates. Vehicle collisions might increase during breeding, when birds are less focused on hazards, and during brood-rearing, when flightless birds would be crossing roads. Reduced speed limits and driver awareness of seasonal bird vulnerability could reduce collision risk from vehicles.

Although facilities in the coastal environment are limited or prohibited (depending on the alternative), all action alternatives include a coastally located STP and docking facilities, both of which could pose hazards to migratory birds. In the ARCP, major movements of migratory birds occur along the coast, many associated with the barrier island and lagoon system, but movements also occur onshore and in marine waters. Weather conditions, such as fog, rain, and low light, increase collision mortality of common eiders at towers and transmission lines (MacKinnon and Kennedy 2011). On the North Slope, birds often migrate at low altitudes and in foggy conditions; migrating eiders averaged 40 feet aboveground level at Point Barrow (Day et al. 2002). Collisions with vehicles, aircraft, or structures in the future would likely injure or kill birds. Although the risk of collisions is low, the consequences are high, resulting in serious injury or death. Unknown numbers of collisions would be expected to occur annually, and mortalities would be a particular concern if flocks of birds of conservation concern are involved. The potential impacts of collisions would occur over the long term as development occurs; however, impacts would be infrequent and seasonal and would be restricted to roads and facilities.

Several ROPs seek to minimize bird collisions with towers and other oil and gas facilities. Under all action alternatives, ROPs 27 and 31 would minimize bird collisions by placing utility lines on VSMs (minimizing poles and overhead lines), marking overhead lines for high visibility where they are unavoidable, and designing towers to reduce both bird strikes and raptor/raven nesting. ROP 26 would reduce collisions of birds with structures by directing exterior lighting down and inward during fall migration, August 1 to October 31.

Construction: Human Activities and Waste Management

During the construction phase, some scavenger and predatory bird and mammal species are likely to be attracted to human activities in search of food. With an augmented food source, the populations of those

species can increase, and consequently indirect and negative impacts on the reproduction of prey species can occur.

Oil development projects in the program area would likely increase the numbers of scavengers and predators in the area, beginning in the construction phase and continuing through operations. Effective food and garbage control, wildlife interaction plans, and personnel training (see ROPs 2, 4, and 25) would minimize the attraction of predators to oil field facilities. However, the potential for development to attract scavengers and predators would be a concern in part because increased predator abundance can decrease productivity and increase mortality of nesting birds (Truett et al. 1997; Johnson et al. 2010).

On the North Slope, ravens and, to a lesser degree, peregrine falcons, gyrfalcons, and rough-legged hawks nest on human-made structures, including buildings, elevated pipelines, bridges, towers, drill rigs, and wellheads (Ritchie 1991; Frost et al. 2007; Powell and Backensto 2009; Sanzone et al. 2010). Some species of passerines (e.g., snow buntings, common redpolls) also are attracted to human structures for nest sites. For these few avian predators and passerines, infrastructure may increase the availability of breeding sites on the ARCP, and the effects would be widespread and long term.

Two avian predators, glaucous gulls and common ravens, are attracted to human food (Day 1998; NRC 2003), and populations of these species have increased in the Coastal Plain of the North Slope (Stehn et al. 2013). Foxes and bears also prey on birds and their eggs and are attracted to areas of human activity, where they readily feed on garbage and handouts (Eberhardt et al. 1982; Follmann and Hechtel 1990; Savory et al. 2014 see also **Section 3.3.4, Terrestrial Mammals**). Arctic foxes in oil-development areas occur at higher densities and experience reduced population fluctuations, compared to foxes in undeveloped regions, increasing potential levels of predation by foxes on nesting birds and their eggs (Eberhardt et al. 1983; Burgess 2000). Foxes also use human structures (gravel berms and empty pipes) for denning and shelter (Eberhardt et al. 1983; Burgess et al. 1993). Oil development projects on the ARCP would attract foxes throughout the year and grizzly bears in summer and fall.

Impacts on nesting birds would include long-term reduction in nesting success, and such effects would be widespread. Liebezeit et al. (2009) detected reduced nest survival among Lapland longspurs from predation up to 3.1 miles from oil field infrastructure. No similar effect was detected for shorebirds; however, the power to detect such an effect may have been low. Results from a larger dataset (n = 1,874) within Prudhoe Bay found the nest survival of shorebirds, passerines, and waterfowl were significantly lower in the areas closer to high-use infrastructure (McGuire et al. 2023). Increased predation by predators attracted to human activities may be an important factor limiting the abundance of some bird species. These effects would occur during the snow-free summer construction season when birds are breeding. The attraction of birds and mammals to construction activities during winter would have minimal impacts beyond perhaps increasing the survival of scavenger and predatory species. If the animals obtain additional food during the winter, however, they could remain in the area during the summer months, with consequent impacts on populations of prey species.

Production: Water Withdrawals for Ice Roads and Pads

During the production phase, water withdrawals from lakes would continue to be needed to develop ice roads necessary for transporting equipment and materials, and for water supply, dust suppression, and other uses. The limits on the availability of freshwater resources on the ARCP, the indirect effects of water withdrawals on bird habitats during production, and the ROPs and Lease Stipulations developed to minimize those impacts would be the same as described above under *Exploration: Water Withdrawals for Ice Roads and Pads*. Drawdowns of water from lakes would continue annually for the duration of the production phase, and this

would include drawdowns for the development of an annual ice road between the ARCP infrastructure and the existing support infrastructure in Deadhorse and Prudhoe Bay.

Production: Marine Water Withdrawals and Discharges

Along the ARCP coast, a STP would be needed during the production phase to develop additional freshwater resources to help support the ice road construction, dust suppression, drilling and makeup water supply, and other uses. During the production phase, the indirect effects of hyper-saline water releases on marine bird habitats (fish and invertebrate prey), and possibly direct effects on waterbirds and shorebirds would be the same as described above under *Construction: Water Marine Water Withdrawals and Discharges*.

Production: Ice Placement for Ice Roads

During the production phase, ice roads would continue to be needed for transporting equipment and materials, and for pipeline maintenance and other activities. The direct effects of alterations in bird habitats from the placement of ice roads during production would be the same as described above under *Exploration: Ice Placement for Ice Roads and Pads*. Ice road development would continue annually for the duration of the production phase, and this would include the annual ice road between the ARCP infrastructure and the existing support infrastructure in Deadhorse and Prudhoe Bay.

Production: Use and Storage of Hazardous Materials

During production, the risk of contaminant spills would continue from routine oil field maintenance activities. Accidental fuel spills from vehicles, storage tanks, aircraft, and equipment during transport or fueling are most likely and such spills would be medium to small in extent. The risks, the potential impacts on birds, and the ROPs and Lease Stipulations developed to minimize spill impacts are described above under *Exploration: Use and Storage of Hazardous Materials*, with additional information on potential spills in marine habitats discussed above under *Construction: Use and Storage of Hazardous Materials*. During the production phase, the risks of a large well blow-out would be substantially reduced relative to the exploration and construction phases because less drilling would occur.

Production: Road Traffic and Human Disturbance

Road traffic on ice and gravel roads and pads and associated human disturbance would continue to occur in the production phase from routine oil field maintenance activities, including pipeline inspection and maintenance, surveying, tundra cleanup (i.e., stick-picking). Additional indirect alteration of bird habitats along gravel roads and pads that could cause displacement would occur from drifted snow, thermokarsting, gravel spray, and fugitive dust. Because these indirect effects on habitats are more directly related to gravel placement than road traffic, they are discussed above under *Construction: Gravel Placement for Roads and Pads*. The disturbance-displacement of birds alongside roads and pads, and the ROPs designed to minimize those impacts are described above under *Construction: Road Traffic and Human Disturbance*. Relative to the construction phase, these disturbance-displacement impacts on birds would be substantially less frequent and smaller in magnitude during production because the vehicles would generally be smaller, would make far fewer passes, and would produce less noise. There would also be less human activity associated with road traffic during production.

Production: Air Traffic Disturbance

Air traffic disturbance (noise, visual disturbance, associated human activities on the ground, and overflight disturbance) would continue to occur in the production phase. This would include potential overflight disturbances to staging flocks of snow geese on the tundra in late summer and fall. Air traffic in the production phase will be needed for routine movements of personnel in and out of project sites (expected to largely be

fixed-wing flights), and to support any environmental monitoring activities that may occur in the vicinity of projects (expected to be helicopter flights). These impacts and the ROPs designed to minimize their effects are described above under *Exploration: Air Traffic Disturbance* and under *Construction: Air Traffic Disturbance*. In general, because there would be less air traffic during production relative to the construction phase, these disturbance impacts would be less frequent. Air traffic disturbance levels may be somewhat similar to those expected during the exploration phase but would be more localized to project infrastructure.

Production: Bird Collisions with Vehicles, Aircraft, and Infrastructure

The potential for bird collisions with ground vehicles, aircraft, and tall structures, including communication towers, would continue in the production phase. The impacts of these potential collisions, which could kill or injure birds, and the ROPs put in place to minimize the impacts are described above under *Construction: Bird Collisions with Vehicles, Aircraft, and Infrastructure*. Because the frequency of trips with both ground vehicles and aircraft would be reduced in the production phase, relative to construction, the collision impact risk during production would also be reduced. Similarly, with drilling operations substantially reduced in the production phase, the risk of bird collisions with tall structures would also be less.

Production: Human Activities and Waste Management

During the production phase, some bird and mammal species are likely to continue to be attracted to human activities at project sites in search of food. The positive impacts on scavenger and predatory species (increased population sizes), the negative impacts on the reproduction of prey species, and the ROPs designed to minimize those impacts are described above under *Construction: Human Activities and Waste Management*. These impacts during the production phase may be cumulative to those that began during construction, especially with habituation of predatory species to human presence, and the possibility of annual reductions in the reproductive success of bird prey species because of nest predation.

Production: Additional Protections for Birds

Several ROPs and stipulations common to all alternatives have the potential to minimize conflicts with birds and other wildlife during the production phase. ROP 40 would require all oil and gas personnel involved in permitted activities to be trained in how to avoid disturbance to birds and other wildlife on an annual basis. Lessees would be required to prepare and distribute information cards on threatened and endangered species (including Steller's and spectacled eiders) to all personnel. ROP 41 would protect stream banks and water quality and maintain populations of and habitat for birds by restricting summer tundra travel. Low-ground-pressure vehicles could be permitted on a case-by case basis following the completion and submission of studies on the impact of these vehicles on tundra soils and vegetation; timing restrictions could be implemented to protect ground-nesting birds. ROP 42 would prohibit following wildlife with a ground vehicle or aircraft, as well as the disturbance to loafing and nesting birds. Lastly, under all alternatives, ROP 43 would seek to prevent the introduction and spread of invasive and noxious plants and animals.

Abandonment: Rehabilitation of Project Sites

As described in the hypothetical development scenarios (**Appendix C**), the estimate is that facilities in the program area would be abandoned and reclaimed 85 years after the first lease. Natural recovery of disturbed sites on the North Slope has been estimated to require 600 to 800 years for upland mesic sites and 100 to 200 years for marsh sites (NRC 2003). When the insulating vegetation mat is disturbed, thermokarst results in permanent alteration of vegetation and morphology.

Rehabilitation activities may speed recovery on lightly disturbed sites, but reclamation and restoration of original habitat value has not been proven for gravel removal in the arctic environment once operations have

ceased (see **Section 3.2.10**). It is unlikely that avian habitats could be restored to their original ecological values, although rehabilitated sites may provide adequate breeding habitats for some species, such as waterfowl, and foraging habitats for some geese, passerines, and shorebirds (Bentzen et al. 2018).

All Project Phases: Habitat Impacts on Breeding Bird Species

To evaluate how habitat impacts from a potential development project could affect breeding bird species, we assessed the value of the land cover (habitat) types mapped on the Arctic Refuge Coastal Plain by Macander et al. (2020). In this analysis, we applied the categorical habitat-use rankings for breeding bird species in northwest Alaska developed by Marcot et al. (2015) to the same species known to occur regularly in the program area. This involved first cross-walking the ecotypes assessed as bird habitats by Marcot et al. (2015) to the land cover types mapped by Macander et al. (2020) in the Coastal Plain (**Table K-12 in Appendix K**). We then applied the habitat-use rankings (high, medium, low, not used) from Marcot et al. (2015) to the same bird species and ecologically similar habitats (land cover types) occurring in the program area (**Table K-13 in Appendix K**). In some cases, this necessitated averaging the Marcot et al. (2015) rankings, and rounding to the nearest habitat-use class, when a particular habitat type in northwest Alaska was represented by one or more land cover types in the program area.

Based on layouts of the newer oil development projects on the North Slope, we know that infrastructure in the program area would be placed preferentially in moist tundra habitats as much as possible. This is because lease stipulations under all action alternatives would restrict development in coastal waters, riverine waters, and floodplains, and because higher value aquatic and wet tundra habitats would be avoided, when possible, to comply with wetland avoidance and minimization procedures during the permitting process. The result is that those breeding bird species that make greater use of moist tundra habitats would experience greater impacts due to habitat loss and disturbance and displacement from potential oil development in the program area. For all action alternatives, the bird species for which moist tundra habitats are ranked as high or medium value during the breeding season and are likely to be adversely affected by development to a greater degree are listed in **Table K-14 in Appendix K**. The species groups predominantly affected are shorebirds and landbirds, with 12 species each ranked as high or medium value for moist tundra habitats, followed by raptors and owls with 8 species. In contrast, fewer waterbird and larid species (5 and 3 each, respectively) were ranked as high or medium value for moist tundra habitats. In general, these species are likely to experience greater impacts from oil development than species that prefer wet and aquatic tundra, and lacustrine, riverine, and coastal habitats during the breeding season. Exceptions to this could occur from impacts of a large oil spill that, if not contained, reaches riverine habitats and coastal waters where some species occur during the breeding season (e.g., foraging red-throated loons and common eiders that nest on barrier islands).

Alternative B

In Alternative B, the entire program area would be available to lease. Alternative B includes 358,100 acres designated NSO to protect nearshore marine and lagoon waters and barrier islands (Lease Stipulation 4) and to protect rivers and streams (Lease Stipulation 1), although essential barge landings, docks, pipelines, and road crossings would be allowed. These restrictions offer some protection to birds in riparian areas by limiting potential habitat loss, alteration, disturbance, and displacement and by reducing the risk of accidental spills. Riparian NSO setbacks of 1 mile from the active floodplain of the Canning and Hulahula Rivers, in particular, may protect cliff-nesting raptors known to occur near those rivers. Important waterbird habitats in the adjacent lakes district within 1 mile of the Canning River floodplain are included in this NSO.

In addition, Alternative B includes 721,200 acres of caribou calving habitat in which construction activity using heavy equipment would be halted between May 20 and June 20 (Lease Stipulation 7), which would

provide some additional protections for tundra breeding birds during the early nesting period. In the same area, road and air traffic restrictions would be applied when caribou are present. Because these traffic restrictions apply only when caribou are present, they would provide only negligible additional protection from disturbance and displacement of birds.

A 750-acre estimated gravel footprint of a stand-alone oil development facility (**Appendix C**) was used to estimate the additional area within 656 feet of that footprint in which behavioral disturbance and displacement of birds could occur (see *Construction: Road Traffic and Human Disturbance* under *Impacts Common to All Action Alternatives* above). The actual area affected would depend heavily on the configuration of roads, but with that standardized footprint of 750 acres, an additional 11,820 acres of tundra within 656 feet was calculated; this represents an additional area 15.8 times larger than the proposed gravel footprint. Under Alternative B, with an estimated allowable surface development footprint of 2,000 acres (**Appendix C**), habitat loss and disturbance and displacement of breeding birds in tundra habitats could occur across about 31,600 acres, or 2.0 percent of the program area (1,563,500 acres).

Without knowledge of where a lease sale could occur or where potential development would occur within a lease block, we can, for the purposes of assessing the potential magnitude of adverse effects on bird habitats, assume that the same proportions of habitats occurring in all areas open to leasing would also occur within the maximum of 31,600 acres that could be affected by a hypothetical development under Alternative B (**Table K-15** in **Appendix K**). Given the layouts of newer oil development infrastructure on the North Slope, however, we know that infrastructure in the program area would be preferentially placed in better drained moist tundra habitats, which when combined, comprise 69 percent of the area open to leasing under Alternative B (see **Table K-14** in **Appendix K**). The bird species mostly likely to be affected to a greater degree from development in moist tundra habitats are discussed above under *Impacts Common to All Action Alternatives* (see *All Project Phases: Habitat Impacts on Breeding Bird Species* and **Table K-14** in **Appendix K**).

Alternative C

Avian habitats under Alternative C would be protected in 526,300 acres that are closed to leasing. An additional 708,200 acres of avian habitats, under Alternative C would be subject to NSO to protect the following:

- Rivers and streams (Lease Stipulation 1)
- The Canning River delta and adjacent lakes (Lease Stipulation 2)
- Additional areas around springs and aufeis (Lease Stipulation 3)
- Nearshore marine, lagoon, and barrier islands (Lease Stipulation 4)
- Polar bear denning habitat (Lease Stipulation 5)
- Additional caribou calving habitat (Lease Stipulation 7)
- The coastal zone (within 2 miles of the coast, Lease Stipulation 9)
- The wilderness boundary (3 miles from wilderness boundary, Lease Stipulation 10)

Exceptions would be made for roads, pipelines, barge landings, and docks; however, there would be no exceptions in areas not offered for lease (caribou calving habitat and springs/aufeis) or in NSO-designated calving habitat.

In addition to large areas closed to leasing under Alternative C, this alternative would protect important avian habitats by requiring larger setbacks than Alternative B for NSO areas associated with rivers and streams.

These setbacks range from 0.5 to 4 miles, depending on the stream, and would include 7 more rivers and streams than Alternative B (Lease Stipulation 1).

Alternative C would protect high-value waterbird habitats in the entire Canning River delta and adjacent lakes district with an NSO designation (Lease Stipulation 2); however, essential pipelines, road crossings, gravel mines, and other permanent facilities may be considered during the permitting process if a lessee can demonstrate that impacts would be minimal. Alternative C would also establish NSO setbacks from spring and aufeis locations such as Sadlerochit Spring, which may also be unavailable for leasing (Lease Stipulation 3). NSO and TL restrictions to protect nearshore marine, lagoon, and barrier island habitats (Lease Stipulation 4), polar bear denning habitat (Lease Stipulation 5), and the Mollie Beattie Wilderness Area and surrounding 3-mile buffer (Lease Stipulation 10) would also protect important coastal bird habitats.

Alternative C would provide additional protections for high value waterbird and shorebird habitat by prohibiting gravel mining in the active floodplains of the Canning, Sadlerochit, Hulahula, and Aichilik rivers (ROP 24). In comparison to Alternative C, Alternative B would not expressly prohibit gravel mining in these floodplains, nor would it require water storage reservoirs be located away from drill sites, fueling stations, and other areas where hazardous materials (e.g., fuel, drilling fluids) may be stored to prevent waterway contamination.

Although all action alternatives designate the nearshore marine lagoons and barrier islands as NSO (Lease Stipulation 4), Alternative C would also designate the area within 2 miles of the coastline as NSO (Lease Stipulation 9). Alternative C would include additional restrictions that may reduce disturbance of migratory, breeding, and staging birds in nearshore and coastal habitats, including a prohibition on exploration (including seismic) in nearshore and barrier island areas between May 15 and November 1 (Lease Stipulation 4). For birds, habitat loss and alteration would be reduced, relative to Alternative B, in these additional NSO areas, as would disturbance and displacement and the risk of accidental spills.

Designation of no lease areas, NSO areas, and CSU areas would potentially reduce impacts on birds. These restrictions would provide protections for waterbirds, shorebirds, raptors, and landbirds using various habitats throughout the program area by reducing habitat loss, disturbance, and mortality/injury. Nearly all of the lands closed to leasing are in the area of low HCP and in inland and drier habitats that are important to landbirds and some shorebirds and are used extensively by fall staging snow geese. Cliff-nesting raptor habitat that could occur in the upper reaches of rivers and streams would be NSO under Alternative C in caribou calving habitats (Lease Stipulation 7). Additional potential cliff-nesting habitat may be protected in a 3-mile buffer next to the Mollie Beattie Wilderness Area (Lease Stipulation 10).

The various NSO areas under Alternative C would protect many of the most important avian habitats: riparian and stream habitats and adjacent wetlands, Canning River delta waterbodies and wetlands, lagoon and barrier island habitats, and coastal habitats. Setbacks for springs and aufeis under Alternative C would provide some protection to several specific sites that are important sources of surface water during summer and thus very important to tundra birds. Although exceptions would be allowed for road and pipeline crossings and for siting an STP on the coast, the NSO areas under Alternative C would protect many important avian habitats.

Under Alternative C, ROP 3 would provide greater protection from some types of fuel spills than under Alternative B. This would protect avian habitats associated with waterbodies and in riparian areas (a 500-foot versus 100-foot setback for fueling equipment and fuel storage over 210 gallons; see exceptions).

Under Alternative C, monitoring and modeling lake and pond recharge after water withdrawals may be required, specifically to ensure aquatic habitat for birds (ROP 9).

Winter tundra travel under Alternative C would require dense snow cover (only depth is considered under other alternatives) and probably would result in lower and shorter-term impacts of seismic exploration and other winter activities on avian habitats. This would be the case particularly in tussock tundra, which is more sensitive to such damage and is the most abundant avian habitat in the program area.

TLs and CSU areas designed to minimize disturbing caribou under Lease Stipulations 6 and 8 would provide some protection to nesting birds. Under Alternative C, the requirement that aircraft flight altitudes be above 1,500 feet would be extended to post-calving ranges. Limited helicopter landings would be extended to July 20 (ROP 34) or through the bird nesting season, both of which could reduce the potential for disturbing nesting birds somewhat, relative to other alternatives. These TLs to protect caribou would reduce potential disturbance of breeding birds, primarily in inland habitats that are important for landbirds, including passerines and ptarmigan, and some shorebirds.

Although protective of all birds, areas closed to leasing and adjacent areas with NSO or CSU restrictions that are intended to protect caribou habitat under Alternative C also overlap extensively with areas known to be used intensively by fall-staging snow geese. By comparison with other alternatives, the lower levels of future aircraft traffic in these areas under Alternative C would result in reduced potential for disturbance and displacement of staging snow geese. As mentioned above, air traffic and other disturbances would likely be low in areas used by the largest numbers of staging snow geese in the southeast portion of the program area, which is closed to leasing under Alternative C; however, potential disturbance and displacement of staging snow geese also would occur during fall in areas north and west of protected caribou calving habitat. These areas also are used by large numbers of staging snow geese in fall, and the TLs to protect caribou would not be protective. Fall-staging snow geese occur throughout these areas and air traffic and other activities there likely would result in potential disturbance and displacement. (Note: Preliminary results from a partial snow goose survey conducted in 2022 suggest fall staging snow geese may also use areas on the western ARCP. Because only a partial survey was completed in 2022 due to weather, additional data is needed before drawing conclusions about snow goose use of the western ARCP.)

A 750-acre estimated gravel footprint of a stand-alone oil development facility (**Appendix C**) was used to estimate the additional area within 656 feet of that footprint in which behavioral disturbance and displacement of birds can occur (see *Construction: Road Traffic and Human Disturbance* under *Impacts Common to All Action Alternatives* above). The actual area affected would depend entirely on the configuration of roads, but with that standardized footprint of 750 acres, an additional 11,820 acres of tundra within 656 feet was calculated; this represents an additional area 15.8 times larger than the proposed gravel footprint. Under Alternative C, with an estimated allowable surface development of 1,464 acres (**Appendix C**), habitat loss and disturbance and displacement of breeding birds in tundra habitats could occur across about 23,131 acres, or 1.5 percent of the program area (1,563,500 acres).

Without knowledge of where a lease sale could occur or where potential development would occur within a lease block, we can, for the purposes of assessing the potential magnitude of adverse effects on bird habitats, assume that the same proportions of habitats occurring in all areas open to leasing would also occur within the maximum of 23,131 acres that could be affected by a hypothetical development under Alternative C (**Table K-17** in **Appendix K**). Given the layouts of newer oil development infrastructure on the North Slope, however, we know that infrastructure in the program area would be preferentially placed in better drained moist tundra habitats, which when combined, comprise 64 percent of the area open to leasing under

Alternative C (see **Table K-14** in **Appendix K**). The bird species mostly likely to be affected to a greater degree from development in moist tundra habitats are discussed above under *Impacts Common to All Action Alternatives* (see *All Project Phases: Habitat Impacts on Breeding Bird Species* and **Table K-14** in **Appendix K**).

Alternative D

Under Alternative D, a larger area (797,700 acres) of avian habitats would be unavailable for leasing than under Alternatives B and C. Under Alternative D, an additional 726,300 acres of avian habitats would be subject to NSO to protect the following:

- Rivers and streams (Lease Stipulation 1)
- The Canning River delta and adjacent lakes (Lease Stipulation 2)
- Additional areas around springs and aufeis (Lease Stipulation 3)
- Nearshore marine, lagoon, and barrier islands (Lease Stipulation 4)
- Polar bear denning habitat (Lease Stipulation 5)
- Additional caribou calving habitat (Lease Stipulation 7)
- The coastal zone (within 2 miles of the coast, Lease Stipulation 9)
- The wilderness boundary (3 miles from wilderness boundary, Lease Stipulation 10)

As with Alternative C, exceptions to the NSO would be made for roads, pipelines, barge landings, and docks; however, there would be no exceptions in areas not offered for lease (e.g., caribou calving habitat, springs/aufeis) or in NSO-designated calving habitat.

In addition to large areas not available for lease sale under Alternative D, this alternative would protect important avian habitats by including larger setbacks than Alternatives B and C for NSO areas associated with rivers and streams. These setbacks range from 0.25 mile to 4 miles, depending on the stream. It also would include at least 18 more named rivers and streams than Alternative B (Lease Stipulation 1).

Like Alternative C, Alternative D also would protect high-value waterbird habitats in the entire Canning River delta and adjacent lakes district with an NSO designation (Lease Stipulation 2); however, essential: pipelines, road crossings, gravel mines, and other permanent facilities may be considered with ROWs or easements across the Coastal Plain for the exploration, development, production, or transportation in accordance with Section 20001(c)(2) of PL 115-97. NSO and TL restrictions to protect nearshore marine, lagoon, and barrier island habitats (Lease Stipulation 4) and polar bear denning habitat (Lease Stipulation 5) would protect important coastal bird habitats.

Alternative D would require developers to submit a Master Development Plan (Lease Stipulation 13) prior to constructing an oil and gas development. The Master Development Plan would reduce potential impacts on birds and bird habitat by attempting to eliminate or minimize redundant infrastructure and the creation of minimally-utilized areas bounded by gravel, which would reduce a proposed development's overall footprint.

Additional NSO and CSU restrictions intended to protect caribou habitat under Alternative D (Lease Stipulation 6) would provide additional protections for birds. The entire Porcupine Caribou Herd comprehensive calving habitat area would be unavailable for leasing (see **Section 3.3.4** for acreage), and CPFs would be prohibited in the Porcupine Caribou Herd comprehensive post-calving habitat area. Other infrastructure would be permitted if it complied with ROPs 23 and 23.1, but the total footprint could not exceed 510 acres in this area.

Two lease stipulations would increase protections for upland bird habitats under Alternative D. The area within 3 miles of the northern border of the Mollie Beattie Wilderness Area boundary would not be available for leasing under Alternative D (Lease Stipulation 10). Lease Stipulation 12 would prohibit permanent oil and gas facilities on yedoma deposits and unstable ice-rich soils to prevent additional permafrost thawing or require design and construction of pipelines and roads to accommodate anticipated thaw or subsidence. Permafrost thawing would alter habitats that upland breeding birds depend on.

Alternative D would provide more protections for lacustrine and riverine bird habitats than Alternatives B and C by increasing setback distances for many rivers and restricting water withdrawal from rivers, streams, and lakes. Alternative D establishes setback distances of 0.25–0.5 mile for more rivers than Alternatives B and C, and a 0.25-mile setback from all unnamed rivers (Lease Stipulation 1). Alternative D would provide stronger protections for perennial springs than Alternatives B and C (Lease Stipulation 3), and it would prohibit new leasing in a greater area of associated habitat than would Alternative B or C. Fuel storage would be located farther from riverine corridors and waterbodies under Alternative D than Alternatives B and C (ROP 3). ROP 8 would not only prohibit withdrawal of unfrozen water from springs, rivers, and streams during winter months, it also would prohibit summer water withdrawals from rivers that support resident, anadromous, or endemic fish populations and establish additional monitoring requirements. Under Alternative D, ROP 9 would prohibit winter water withdrawals from lakes with any sensitive fish species and set up additional reporting requirements. Alternative D would further reduce stream damage and protect riparian habitat by requiring the removal or slotting of winter ice bridges and the removal of ramps without damaging stream banks (ROP 12), and by prohibiting exploratory drilling in rivers and streams that support resident, anadromous, or endemic fish populations (ROP 16).

Under Alternative D, several lease stipulations and ROPs would increase protection for birds that use riparian habitats. Gravel mines only would be permitted in setback areas near rivers and streams that do not support resident, anadromous, or endemic fish populations (Lease Stipulation 1). This would provide modest protection for waterbirds and larids that depend on riverine habitats for food during breeding, staging, and migration by limiting habitat loss and modification and decreasing disturbance from mining activities (blasting, transport, and fugitive dust). Alternative D could reduce tundra damage by prohibiting the use of the same ice road route each year and requiring offsets to avoid multi-year use (ROP 11). Under Alternative D, restriction of permanent facility construction would extend to within 500 feet of the active floodplain of fish-bearing waterbodies (ROP 19), as opposed to the ordinary high watermark under Alternatives B and C. This would provide additional protection for birds as floodplain habitats often receive concentrated use by breeding, foraging, and staging waterbird and shorebird species. Under Alternative D, ROP 24 would provide stricter protections for active floodplains of fish-bearing rivers from gravel mining than Alternatives B and C. Gravel mining would be prohibited in nine river floodplains; a survey of outcrops or cliffs for nesting raptors also would be required prior to submitting a Plan of Operations.

A 750-acre estimated gravel footprint of a stand-alone oil development facility (**Appendix C**) was used to estimate the additional area within 656 feet of that footprint in which behavioral disturbance and displacement of birds can occur (see *Construction: Road Traffic and Human Disturbance* under *Impacts Common to All Action Alternatives* above). The actual area affected would entirely depend on the configuration of roads, but with that standardized footprint of 750 acres, an additional 11,820 acres of tundra within 656 feet was calculated; this represents an additional area 15.8 times larger than the proposed gravel footprint. Under Alternative D, with an estimated allowable surface development of 1,040 acres (**Appendix C**), habitat loss and disturbance and displacement of breeding birds in tundra habitats could occur across about 16,432 acres, or 1.0 percent of the program area (1,563,500 acres).

Without knowledge of where a lease sale could occur or where potential development would occur within a lease block, we can, for the purposes of assessing the potential magnitude of adverse effects on bird habitats, assume that the same proportions of habitats occurring in all areas open to leasing would also occur within the maximum of 16,432 acres that could be affected by a hypothetical development under Alternative D (**Table K-19** in **Appendix K**). Given the layouts of newer oil development infrastructure on the North Slope, however, we know that infrastructure in the program area would be preferentially placed in better drained moist tundra habitats. The bird species mostly likely to be affected to a greater degree from development in moist tundra habitats are discussed above under *Impacts Common to All Action Alternatives* (see *All Project Phases: Habitat Impacts on Breeding Bird Species* and **Table K-14** in **Appendix K**).

Alternative D2

Of the action alternatives, Alternative D2 includes the greatest area (1,163,500 acres) of avian habitats that would be unavailable for leasing. Compared to Alternative D, Alternative D2 would make more acreage available for lease sale subject to CSU (84,300 acres) and TL (3,100 acres), as well as under STC (80,900 acres). Under Alternative D2, 231,700 acres would be subject to NSO to protect the following:

- Rivers and streams (Lease Stipulation 1)
- The Canning River delta and adjacent lakes (Lease Stipulation 2)
- Additional areas around springs and aufeis (Lease Stipulation 3)
- Nearshore marine, lagoon, and barrier islands (Lease Stipulation 4)
- Polar bear denning habitat (Lease Stipulation 5)
- Additional caribou calving habitat (Lease Stipulation 7)
- The coastal zone (within 2 miles of the coast, Lease Stipulation 9)
- The wilderness boundary (3 miles from wilderness boundary, Lease Stipulation 10)

Like Alternatives C and D, exceptions to the NSO would be made for roads, pipelines, barge landings, and docks. Unlike Alternative D, however, one-time exceptions may be granted in some areas not offered for lease such as coastal areas and wilderness boundary setbacks. The operator must demonstrate that there are no practical alternatives to accessing subsurface resources; the proposed action would maintain resource functions; and the proposed action complies with other applicable laws (see Lease Stipulations 1, 2, 4, 5, 9, and 10).

Similar to Alternative D, Alternative D2 would protect important avian habitats by excluding large areas from lease sale and providing more protections for coastal habitats than any other alternative. These measures would primarily benefit the many waterbirds, shorebirds, and larid species that use nearshore marine waters, lagoons, barrier islands, coastlines, and river deltas. Under Alternative D2, no permanent oil and gas infrastructure would be permitted from the coastline to 2 miles inland, and oil and gas activities would not be allowed in coastal areas between 15 May and 1 November or when the sea ice edge is at least 10 miles beyond the coast, whichever is later (Lease Stipulation 9). As with Alternative D, Alternative D2 would protect high-value waterbird habitats in the entire Canning River delta and adjacent lakes district with an NSO designation (Lease Stipulation 2); however, essential pipelines, road crossings, gravel mines, and other permanent facilities may be considered with ROWs or easements across the Coastal Plain for the exploration, development, production, or transportation in accordance with Section 20001(c)(2) of PL 115-97. NSO and TL restrictions to protect nearshore marine, lagoon, and barrier island habitats (Lease Stipulation 4) and polar bear denning habitat (Lease Stipulation 5) would protect important coastal bird habitats. Under Alternative D2, Lease Stipulation 5 would prohibit leasing from the coast to 1 mile inland along the coastline of the critical polar bear denning habitat in the Northwest portion of the Arctic Refuge near the Canning and Staines Rivers

and in the Camden Bay area. Additional timing limitations meant to reduce disturbance to denning polar bears may reduce disturbance to overwintering bird species, of which there are few in the project area.

Two lease stipulations would provide some protections for upland bird habitats under Alternative D2; however, they would not be as stringent as those under Alternative D. The area within 3 miles of the northern border of the Mollie Beattie Wilderness Area boundary would not be available for leasing under Alternative D (Lease Stipulation 10), although one-time exceptions may be granted by the BLM Authorized Officer if the operator can demonstrate a lack of practical alternatives, maintain resource functions, and comply with other applicable laws. Under Alternative D2, Lease Stipulation 12 would not prohibit permanent oil and gas facilities on yedoma deposits and unstable ice-rich soils through an NSO designation, but it would require facilities to be designed and constructed to accommodate thaw subsidence anticipated over the design life in these areas. Overall, more upland bird habitat would be protected under Alternative D2 because areas of low and medium hydrocarbon potential, both of which encompass more upland habitat than areas of high hydrocarbon potential, would be unavailable for lease sale.

Like Alternative D, Alternative D2 would provide more protections for lacustrine and riverine bird habitats than other alternatives by increasing setback distances for many rivers and restricting water withdrawal from rivers, streams, and lakes. River setback distances are the same as those under Alternative D and range from 0.25 mile to 4 miles, depending on the stream (Lease Stipulation 1). Setbacks for both Marsh and Carter creeks are 0.5 mi under Alternative D2, an increase from 0.25 mi under Alternative D; however, unnamed rivers would not be protected with a 0.25-mile setback. Alternative D2 provides the same strong protections for perennial springs (Lease Stipulation 3) as Alternative D, and it also would prohibit new leasing in a greater area of associated habitat than would Alternative B or C. As with Alternative D, fuel storage would be located farther from riverine corridors and waterbodies than other Alternatives C and D (ROP 3). Just like Alternative D, ROP 8 would not only prohibit withdrawal of unfrozen water from springs, rivers, and streams during winter months, it also would prohibit summer water withdrawals from rivers that support resident, anadromous, or endemic fish populations and establish additional monitoring requirements. Under Alternative D2, ROP 9 is strengthened to require additional modeling or monitoring of all lakes (not just fish-bearing lakes or lakes of special concern, as in Alternative D) to ensure aquatic habitat connectivity for bird and fish species. Like Alternative D, Alternative D2 would further reduce stream damage and protect riparian habitat by requiring the removal or slotting of winter ice bridges and the removal of ramps without damaging stream banks (ROP 12), and by prohibiting exploratory drilling in rivers and streams that support resident, anadromous, or endemic fish populations (ROP 16).

Under Alternative D2, several lease stipulations and ROPs would increase protection for birds that use riparian habitats. As with Alternative D, gravel mines only would be permitted in setback areas near rivers and streams that do not support resident, anadromous, or endemic fish populations (Lease Stipulation 1). This would provide modest protection for waterbirds and larids that depend on riverine habitats for food during breeding, staging, and migration by limiting habitat loss and modification and decreasing disturbance from mining activities (blasting, transport, and fugitive dust). Like Alternative D, Alternative D2 could reduce tundra damage by prohibiting the use of the same ice road route each year and requiring offsets to avoid multi-year use (ROP 11). Under Alternative D2, restriction of permanent facility construction would extend to within 500 feet of the active floodplain of fish-bearing waterbodies (ROP 19), as opposed to the ordinary high watermark under Alternatives B and C. This would provide additional protection for birds as floodplain habitats often receive concentrated use by breeding, foraging, and staging waterbird and shorebird species. As with Alternative D, Alternative D2, ROP 24 would provide the strictest protections for active floodplains of

fish-bearing rivers from gravel mining. Gravel mining would be prohibited in nine river floodplains; a survey of outcrops or cliffs for nesting raptors also would be required prior to submitting a Plan of Operations.

Alternative D2, like Alternative D, would require developers to submit a Master Development Plan (Lease Stipulation 13) prior to constructing an oil and gas development. The Master Development Plan would reduce potential impacts on birds and bird habitat by attempting to eliminate or minimize redundant infrastructure and the creation of minimally-utilized areas bounded by gravel, which would reduce a proposed development's overall footprint.

A 750-acre estimated gravel footprint of a stand-alone oil development facility (**Appendix C**) was used to estimate the additional area within 656 feet of that footprint in which behavioral disturbance and displacement of birds can occur (see *Construction: Road Traffic and Human Disturbance* under *Impacts Common to All Action Alternatives* above). The actual area affected would entirely depend on the configuration of roads, but with that standardized footprint of 735 acres, an additional 11,820 acres of tundra within 656 feet was calculated; this represents an additional area 15.8 times larger than the proposed gravel footprint. Under Alternative D2, with a total allowable development footprint of 995 acres (**Appendix C**), habitat loss and disturbance and displacement of breeding birds in tundra habitats could occur across about 14,947 acres, or 0.96 percent of the program area (1,563,400 acres).

Without knowledge of where a lease sale could occur or where potential development would occur within a lease block, we can, for the purposes of assessing the potential magnitude of adverse effects on bird habitats, assume that the same proportions of habitats occurring in all areas open to leasing would also occur within the maximum of 14,947 acres that could be affected by a hypothetical development under Alternative D2 (**Table K-21** in **Appendix K**). Given the layouts of newer oil development infrastructure on the North Slope, however, we know that infrastructure in the program area would be preferentially placed in better drained moist tundra habitats, which when combined, comprise 59 percent of the area open to leasing under Alternative D2 (see **Table K-14** in **Appendix K**). The bird species mostly likely to be affected to a greater degree from development in moist tundra habitats are discussed above under *Impacts Common to All Action Alternatives* (see *All Project Phases: Habitat Impacts on Breeding Bird Species* and **Table K-14** in **Appendix K**).

Transboundary Impacts

Impacts of the proposed action on birds are not anticipated to reduce populations or regional abundance and density. No transboundary effects of leasing and subsequent development are anticipated for most bird species. One exception could be the displacement of fall staging snow geese. In the event that air traffic or other disturbance displaces them without habituation,⁶ numbers of snow geese using staging habitats in Alaska may decrease. There would be a resulting increase in geese using those habitats on the other side of the border in Canada.

Limiting factors for the western Arctic population snow geese are unknown, and the species' numbers continue to increase across North America. This suggests that staging and other habitats remain abundant for the species. While the degree to which snow geese would be displaced cannot be predicted, observations suggest that the primary impact would be on the seasonal distribution of geese and that populations would not be affected. In contrast, migratory birds that use habitats in the ARCP face myriad impacts in migration, staging, and wintering areas beyond the program area.

⁶The diminishing response to frequent disturbance.

Transboundary impacts in other locations (e.g., Canada) may significantly affect the abundance of birds in the program area. Species such as brant and eiders may be particularly vulnerable because entire populations depend on specific and potentially vulnerable habitats in migration and wintering areas (Ward et al. 2005; Leach et al. 2017). The worldwide abundance of brant appears to be decreasing (Sedinger et al. 2018), and there are concerns about the changing distribution of eelgrass, the primary forage species in staging and wintering areas (Shaughnessy et al. 2012).

Unlike most other waterbirds that winter primarily in North America, red-throated loons from the ARCP winter in East Asia (McCloskey et al. 2018), where they are exposed to polychlorinated biphenyls (PCBs) (Schmutz et al. 2009) and habitat loss to development in coastal wintering areas.

Outside of Alaska, shorebird habitats are seriously threatened, and important habitats for Alaska's shorebirds during nonbreeding seasons are being lost in many parts of the world (Alaska Shorebird Group 2019). Shorebirds wintering in East Asia, such as dunlin breeding on the Coastal Plain, have lost much of their mudflat habitats to shoreline reclamation and industrial development (Weidensaul 2018). The loss of tidal habitats is a worldwide problem, caused not only by industrial development, but also by beach recreation, poaching and subsistence hunting, and agriculture and aquaculture.

Shorebird numbers in general have decreased by half since 1974 (Weidensaul 2018), with the steepest declines among long-distance migrants that nest in the Arctic; other arctic-nesting species also are in decline (US Shorebird Conservation Plan Partnership 2016).

Many landbirds of the ARCP face similar challenges in migration and wintering areas. Many neotropical migrant passerines are of high conservation concern, due to habitat loss and alteration from industrial development, recreation, and land use changes in Central and South America. Although specific causes for population declines often are unknown, many conservation listings for landbirds (see **Table K-9** in **Appendix K**) are the result of threats to habitats or survival in wintering areas (ADFG 2015).

Cumulative Impacts

The cumulative effects of past, present, and reasonably foreseeable future actions (see **Appendix G**) would be similar to the direct and indirect impacts on birds that were described previously for the program area lease sales. Such proposed projects as SAE geophysical exploration in the program area, the LNG pipeline, the increased transportation network, and additional oil and gas development in Alaska would have cumulative effects on birds and their habitats. Future oil and gas developments and other actions would occur in both terrestrial and marine environments and would affect birds. Because materials for ARCP development would arrive by ice road or barge from the west, cumulative effects would occur across northern Alaska. This includes NPRA development areas and coastal and marine areas through transportation and shipping corridors (Sullender 2018).

The National Research Council (NRC 2003) identified higher predator densities and increased predation on nests as the most apparent effect of oil development on birds. The effects of increased predation on birds and their nests are likely to increase in association with RFD scenarios and combined with other projects in the program area. For uncommon or rare species and for some colonially nesting species, such impacts could be more acute. Populations of gulls and ravens would continue to increase on the North Slope as human presence increases. Also, foxes and bears would continue to be attracted to developed sites, with adverse consequences for nesting birds.

All RFD scenarios would increase the loss and alteration of avian habitats across much of Alaska's North Slope and in combination with other projects in the region. In most areas, particularly in oil fields, the density of development would be relatively low and would have little effect on the abundance or distribution of birds; however, some types of projects may result in higher density development. This could adversely affect or exclude breeding birds from larger areas, particularly near villages and in land managed by entities other than the BLM. In the Prudhoe Bay area, where oil infrastructure density is high, the nest survival of shorebirds, passerines, and waterfowl has shown to be reduced in areas closer to infrastructure (McGuire et al. 2023).

All types of direct habitat loss are long term to permanent, although some habitat function may be restored with rehabilitation. The impacts under all alternatives would contribute to cumulative impacts on birds and their habitats. Alternative B has the greatest potential for effects and Alternative D2 would contribute the fewest, due to restricting the leased area to a maximum of 800,000 acres. The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate or degree of the potential cumulative impacts.

With documented impacts on reproductive success and predation rates, industrial areas on the Arctic Coastal Plain may become a population sink for many species of birds (NRC 2003), meaning that local reproduction is inadequate to maintain the species and local densities are maintained by immigration from source areas where reproduction exceeds mortality. Although overall densities do not appear to have decreased in industrial areas, such species would be extremely vulnerable to the effects of impacts in other parts of their seasonal range.

Transportation activities are anticipated to increase in support of both oil and gas development projects and of coastal villages, along with increases in research and recreational transportation. Increased transportation would include overland movement as the road system increases in size, barge and boat traffic, and passenger and cargo air traffic. Future surface, boat, and air traffic would increase the levels of disturbance of birds and the occurrence of fuel and other contaminant spills in both terrestrial and marine environments important for birds. Road development associated with past, present, and reasonably foreseeable future projects could increase access for hunters, recreationists, and predators. It also would increase disturbance and mortality of birds, especially in remote areas, as previously described. Subsistence activities involving bird hunting and egg harvesting would continue with similar types of activities and areas used.

If residents of adjacent villages are allowed access to roads, harvest of birds may increase. Such impacts would be localized and, future subsistence activities and scientific research are unlikely to adversely affect bird populations.

Recreation and tourism could adversely affect birds, depending on locations and seasons, intensity, and types of transport. Air-based sightseeing could cause widespread disturbance, as could cruise ships. Community development projects, such as airport improvements, roads and ports, telecommunication, and energy projects, all would result in habitat loss and alteration, disturbance, and displacement of birds in the vicinity of such communities; it also would result in small increases in impacts on bird populations.

Climate change (see **Section 3.2.1**, Climate and Meteorology) would continue to affect birds throughout the program area and could alter the rate or degree of potential cumulative impacts. The impacts of climate change along with variability in the response by birds (e.g., plasticity in the life-history of individual species [see Robinson et al. 2019]), would introduce substantial uncertainty in predicting the demographic trends of species. The large magnitude of climate change effects, accompanied by increases in already high climate variability in the Arctic, are likely to overshadow the smaller magnitude impacts of oil development, making

it difficult to differentiate among direct, indirect, and cumulative impacts. Extinctions, predicted to increase dramatically and particularly among birds, may alter the avian community with or without oil leasing and development in the ARCP and irrespective of habitat alterations anticipated to result from global climate change.

3.3.4 Terrestrial Mammals

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, reclamation, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on terrestrial mammals from on-the-ground activities.

Oil and gas activities in the program area have the potential to affect terrestrial mammals through habitat loss and alteration, behavioral disturbance and displacement, and injury or mortality as a result of oil and gas exploration and development (**Table 3-28**). The impacts of oil and gas development on caribou have been summarized in various reviews, along with appropriate mitigation measures (Shideler 1986; Cronin et al. 1994; Murphy and Lawhead 2000; Lawhead et al. 2006), which are incorporated here by reference and are summarized below. Because specific project plans are not available for analysis, the areas available for leasing with and without restriction under each alternative were summarized in relation to the available data on terrestrial mammal distribution and in relation to predicted oil potential and the hypothetical development scenario (**Appendix C**). The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under this alternative, current management actions would be maintained, and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). There would be no direct or indirect impacts on terrestrial mammals from oil and gas activities under Alternative A.

Impacts Common to All Action Alternatives

Future seismic exploration could occur in the program area and is most likely to occur in specific areas of lease sales. Operators would likely conduct smaller scale 3D surveys on their own lease blocks, assuming that seismic information would not already be available. Seismic exploration has the potential to affect terrestrial mammals by eliminating below-snow habitat or limiting movements for small mammals, reducing forage availability during winter through compaction of snow and underlying vegetation, and disturbing species that are active during winter including muskoxen, wolves, wolverines, and by disturbing denning grizzly bears and wolverines. Occupied dens of grizzly bears detected during den surveys would be avoided by at least a half-mile, although complete detection of dens is unlikely (Amstrup et al. 2004a).

Table 3-28
Summary of the Type, Context, and Duration of Potential Effects of Oil and Gas Exploration, Construction, and Drilling and Operations on Terrestrial Mammals

Project Component	Potential Effect	Type	Context	Duration
Exploration	Elimination of under-snow habitat for small mammals	Adverse	Site-specific	Short term
	Disturbance of active or denning mammals during winter	Adverse	Local	Short term
	Change in phenology or damage to forage plants	Adverse	Site-specific	Short term/long term
Gravel and pipeline infrastructure	Habitat loss from gravel fill placement	Adverse	Site-specific	Long term
	Habitat alteration due to drifted snow, gravel spray, and dust deposition adjacent to gravel infrastructure	Adverse	Local	Long term
	Early snowmelt due to dust deposition	Neutral	Local	Long term ¹
	Displacement of caribou from infrastructure during calving	Adverse	Program area-wide	Long term
	Attraction of caribou to roads and gravel pads during oestrid fly harassment	Neutral	Local	Long term
	Disturbance and altered behavior due to noise and activities associated with construction and drilling and operation	Adverse	Local	Long term
	Alteration of normal movement patterns and fragmentation of habitat due to roads and pipelines	Adverse	Local	Long term
	Injury or mortality of large mammals due to vehicle strikes on gravel roads	Adverse	Site-specific	Long term
	Injury or mortality of small mammals due to vehicle strikes on gravel roads	Adverse	Site-specific	Long term
	Contamination from accidental spills of oil or other contaminants	Adverse	Local	Long term
	Contamination of roadside forage due to dust	Adverse	Local	Long term
	Injury or mortality of small mammals in subterranean burrows	Adverse	Site-specific	Long term
Ice roads and pads	Habitat alteration due to drifted snow, delayed ice melt, vegetation compression, and hydrologic alteration from ice roads	Adverse	Local	Short term
	Displacement from ice roads and ice pads due to noise and activity	Adverse	Local	Short term
	Injury or mortality due to vehicle strikes on ice roads	Adverse	Site-specific	Short term
	Injury and mortality of small mammals in under-snow habitats	Adverse	Site-specific	Short term
Gravel Mine	Habitat loss due to gravel mining	Adverse	Site-specific	Long term
	Habitat alteration from dust, water displacement, and hydrologic alteration at gravel mine	Adverse	Local	Long term
	Displacement from gravel mine due to noise and activity	Adverse	Local	Long term

1. Early snowmelt will make early emergent forage more accessible but may negatively affect forage quality over the long-term.

In recent years, the program area has been used very little by caribou during winter (Clough et al. 1987; Porcupine Caribou Technical Committee 1993; Ryder et al. 2007), so direct impacts on that species during that time frame would be negligible, although caribou that are present in the winter are important to subsistence hunters and more caribou may be in the program area in the future. The Central Arctic Herd is

more likely to be north of the Brooks Range during winter in years when fall snowfall on the ACP is lower (Pedersen et al. 2021).

Potential localized disturbance of the small number of muskoxen along the western boundary of the program area could result from seismic exploration in areas of high HCP. Seismic activity has been shown to temporarily displace muskoxen as far as 2 miles away (Clough et al. 1987). Reynolds and LaPlant (1985) found that muskoxen did not leave areas of traditional use following seismic activities, but two herds moved 1.2–3.4 miles, following a close approach of seismic exploration vehicles. Two herds ran when vehicles were over 1.9 miles away, but three herds did not run until vehicles were about 330 to 1,300 feet away. If the muskoxen population increases in the program area, more disturbance from seismic activity would occur. Increased energetic costs during winter could have negative impacts on muskoxen body condition and survival and activity that occurs along large river corridors where muskoxen are more likely to occur is more likely to impact muskoxen (USFWS 2001).

Potential indirect effects of seismic exploration would include short-term compaction of snow cover in foraging habitats for herbivores. The timing of snowmelt during the spring following seismic exploration would change as a result of snow compaction and changes in snow drifting. Delayed snowmelt in the spring could decrease or alter the timing of forage available to caribou and other herbivores as well as the forage quality of vegetation (Cebrian et al. 2008).

Some potential habitat alterations and long-term damage to forage plants for herbivores, such as tussock cotton grass and riparian willow shrub, is also likely to occur, as described in the **Section 3.3.1** and in NRC (2003). Most trails recover within 8 years, but the amount of long-term⁷ damage to vegetation that occurs would depend on snow depth, topography and habitat types (NRC 2003; Walker et al. 2019). The program area typically has higher topography with more variable snow cover than areas to the west. This could result in more long-term vegetation damage (Walker et al. 2019).

Trails associated with camp moves may result in more vegetation damage than seismic trails (NRC 2003; Walker et al. 2019). Some cleanup and other activities associated with seismic activities may occur during the summer, resulting in disturbance and displacement to calving caribou and other mammals. The timing of these activities could be managed to minimize these impacts.

All action alternatives could result in direct surface impact from future placement of gravel infrastructure on leased land, in addition to associated development on adjacent land owned by ANCSA corporations in the program area, but not subject to PL 115-97. The amount of future construction activity and spatial distribution would vary across action alternatives as described separately for each alternative later in this section.

During winter, future construction activities would affect mammals that are active all year or are denning in the area. Wolverine may avoid areas of infrastructure (May et al. 2006; Gardner et al. 2010) although there is limited data on interactions between wolverines and infrastructure (Glass et al. 2022b). Future summer construction activities could potentially disturb all mammal species using the program area in that season. Increased disturbance could result in increased energetic costs, decreased time spent feeding, or displacement from preferred habitat.

Future construction activities would result in potential loss and alteration of terrestrial mammal habitats due to gravel placement for roads, pads, and airstrips, as well as from gravel extraction from mine sites. Small mammals in under-snow burrows may be killed because of gravel placement, gravel mining, and ice road

⁷Long-term refers to impacts lasting over 5 years.

construction during winter. Direct habitat loss would reduce forage availability for herbivorous terrestrial mammals. For most herbivorous terrestrial mammals, foraging habitat is abundant across the program area, although proposed activities may disproportionately reduce availability of seasonally important forage during some years for some species, such as calving caribou. Caribou from the Central Arctic Herd may also potentially lose or reduce use of the only portion of the primary Central Arctic Herd mosquito-relief habitat that does not currently contain some development. Habitat loss also would eliminate denning and burrowing habitat for some species of small mammals, but the availability of denning habitat does not appear to be a limiting factor for those species. Gravel fill occasionally may be used for artificial den sites by small numbers of bears and foxes, although ROP 25 requires operators to use available technology to prevent facilities from providing nesting, denning, or shelter sites for ravens, raptors, and foxes. Gravel roads and pads may be used as oestrid fly relief areas by caribou (White et al. 1975; Pollard et al. 1996; Murphy and Lawhead 2000; Prichard et al. 2020a).

Potential indirect impacts on terrestrial mammals would include habitat alteration, fragmentation, and loss or avoidance of use of preferred habitat because of disturbance and displacement. Habitat near gravel infrastructure is likely to be affected by physical alteration caused by dust deposition, gravel spray, thermokarst, flow alteration, and impoundments. The magnitude of these impacts varies, depending on species, habitat type, volume of ground ice, and hydrologic regime (Brown and Grave 1979; Walker et al. 1987). Habitat alteration would reduce local forage availability for herbivorous mammals, such as caribou, muskox, moose, and some small mammals. Snowdrifts along roads would reduce the availability of winter forage locally for herbivores and delay its availability in the spring. Deposition of fugitive dust on snow, caused by vehicle traffic on gravel roads, would lead to early snowmelt and green-up in affected areas, attracting some caribou in spring before calving to feed on early emerging forage. The introduction of a large amounts of human-related scents could impact wildlife in unpredictable ways (Finnerty et al. 2022). Caribou use olfaction to detect predators, for intraspecific communication, and to identify good foraging areas (Bergerud and Nolan 1970; Müller-Schwarze et al. 1979). Although there is little research on the subject, it is possible that anthropogenic odors could impact some of these important functions for caribou or other terrestrial mammals.

Injury and mortality of terrestrial mammals is possible as a result of vehicle strikes on gravel roads and ice roads during construction, although a vehicle management plan would be required and may lower the incidence of vehicle strikes (ROP 23). Caribou and other mammals attracted by early vegetation greening along gravel roads during spring snow melt would be at increased risk of injury or mortality. Caribou move unpredictably during the oestrid fly season and often use gravel roads and pads as travel routes and as relief habitat, increasing the risk of vehicle-related injury and mortality during that period. Collision rates for terrestrial mammals in the Alpine and GMT oil developments to the west of the program area ranged from one to seven collisions per year with a total of 25 reported collisions from 2015 to June 2021. Collisions were mostly with foxes (16 red foxes, 3 arctic foxes, and 3 unknown species of fox), but collisions with one wolverine, one muskrat, and one caribou were also reported (BLM 2023a). On the 55-mile-long road between the Red Dog Mine and the coast, there were 11 caribou fatalities reported between January 2004 and November 2017 (BLM 2020e; p. 3-97).

Few data are available on the effects of noise and light on caribou, but according to traditional knowledge of North Slope Iñupiat, furbearers and caribou are particularly sensitive to noise and human activity (SRB&A 2017b, 2009a). Tyler et al. (2018) suggested that caribou may avoid power lines in winter due to their ability to detect light in the ultraviolet range. Noise and light associated with vehicles, aircraft, and other human activity is likely to increase the level of disturbance associated with those activities, which could result in

adverse effects on terrestrial mammals, due to increased disturbance, altered behavior, and displacement. Caribou are able to hear sounds associated with oil and gas activity (Perra 2022) and low-level aircraft activity impacts subsistence hunters (Stinchcomb et al. 2020). Required aircraft use plans and altitude restrictions (ROP 34) would lower, but not eliminate, impacts from aircraft.

Vegetation damage from future ice-road construction could reduce the abundance and quality of forage for terrestrial mammals, particularly caribou. The compaction of vegetation could reduce concealing cover for small mammals. Some long-term habitat damage would result from the repeated annual use of ice roads and pads. Tussock tundra and sedge/grass meadow are preferred cover classes for caribou. Moose generally prefer tall shrub and riverine landcover types. Drier habitat classes are preferred by arctic ground squirrels and denning foxes. Many other terrestrial mammals in the program area (**Table K-21** in **Appendix K**) are opportunistic and do not have restrictive habitat preferences.

Disturbance by future vehicle traffic, structures, and construction activities, including blasting associated with gravel mining, causes a variety of potential impacts on the behavior and movements of terrestrial mammals. Human activity could displace moose and caribou from calving locations if they calve in the area. Some species, particularly bears and foxes, may be attracted to areas of human activity in the program area due to the availability of food or shelter. Humans may haze bears and foxes attracted to infrastructure or, in extremely rare situations, may kill them in defense of life or property; the use of a waste management plan (ROP 2) and a grizzly bear interaction plan (ROP 4) would lower that risk (Pedersen et al. 2020). An increase in red foxes due to increased access to human food sources could result in a decline in arctic fox densities; an increase in grizzly bears could result in higher predation on prey species, including caribou and moose calves. Winter or spring construction may disturb grizzly bears in dens that are not found by preconstruction denning surveys.

Potential behavioral effects of disturbance on caribou include displacement of maternal caribou during calving and early lactation (late May to late June), deflection and delays in caribou movements across roads and pipelines during the summer insect season (late June to mid-August), and potentially during spring and fall migrations for the smaller numbers of caribou present in those seasons. Potential disturbance could result in behavioral responses, such as reduced foraging rates, increased movements, and energetically costly flight responses, or displacement from suitable habitat (Shideler 1986; Cronin et al. 1994; Murphy and Lawhead 2000; Murphy et al. 2000; Russell and Gunn 2019, Smith et al. 2023).

Research in the Kuparuk and Milne Point oil fields on the central North Slope has demonstrated that maternal caribou tend to avoid roads and pads by as far as 1.25 to 3.1 miles (Dau and Cameron 1986; Lawhead 1988; Johnson and Lawhead 1989; Cameron et al. 1992; Cronin et al. 1994; Lawhead et al. 2004; Vistnes and Nellemann 2008; Johnson et al. 2020; Prichard et al. 2020a, 2022), and areas with high density of infrastructure (Nellemann and Cameron 1996). Some calving still occurred in those areas near roads and pads, but the avoidance was strongest near the development and tapered off with distance (Cameron et al. 1992; Johnson et al. 2020; Prichard et al. 2020a). Aerial surveys conducted before and after construction of the Milne Point Road indicated that caribou densities within 0 to 2.49 miles of the road decreased, while densities within 2.49 to 3.75 miles from the road increased after construction (Cameron et al. 1992). Displacement observed in the Central Arctic Herd lasts from calving (late May to mid-June) up to when calves are approximately 3 weeks of age, when the level of displacement declines (Smith et al. 1994; Cronin et al. 1998; Lawhead et al. 2004; Haskell et al. 2006; Prichard et al. 2020a, 2022) but displacement within 1.2 miles (2 km) of roads during the post-calving season was reported in studies based on GPS collars (Johnson et al. 2020, Severson et al. 2023). This corresponds to the calving and post-calving periods for the Porcupine Caribou Herd.

The reported distances of lower densities near development for caribou or Zones of Influence (ZOI) have varied widely by study, area, and disturbance type. Vistnes and Nellemann (2008) reviewed the literature on displacement distances and found that most regional studies have reported that caribou reduce their use of areas within 3.1 miles of development by 50 to 95 percent. A recent study of two approximately 15-square-mile open-pit mines, with extensive activity and substantial dust deposition, recorded a ZOI of 3.8–11.6 miles in the 9 of 15 years with significant ZOIs (Boulanger et al. 2021).

Plante et al. (2018) found that ZOI varied widely by disturbance type and year. They reported summer ZOI of 12.4 to 14.3 miles for mines, 0 to 5 miles for roads, and 1.2 to 2.5 miles for human settlements. In winter ZOI for roads with hunting ranged from 0 to 9.3 miles, and ZOI for roads without hunting ranged from 0 to 1.9 miles suggesting that ZOI were higher in areas where roads were used for hunting.

Porcupine Caribou Herd caribou have had much less exposure to human development and activities than have Central Arctic Herd caribou, so they would be expected to have stronger reactions to infrastructure than Central Arctic Herd caribou for some period of years. Stankowitz (2008) reviewed the available literature and reported that there was weak but robust evidence that escape responses in ungulates declined with repeated exposure to human activity. Large behavioral changes near infrastructure were observed in Central Arctic Herd caribou soon after construction of oilfields (Smith and Cameron 1985, Johnson and Lawhead 1989) including moving parallel to a pipeline for 20 miles (32 km), but ADFG researchers studying the Central Arctic Herd during and after construction of the Kuparuk oilfield concluded that, caribou did not habituate to human activity during calving season, but there was evidence that their ability to cross roads and pipelines improved during other seasons (Smith et al. 1994). Similarly, Lawhead et al. (2006) noted that researchers studying Central Arctic Herd caribou during the first decades of oil development reported that caribou seem to have greater tolerance of certain aspects of infrastructure and including their ability to cross pipelines. Johnson and Russell (2014) estimated avoidance responses of Porcupine Caribou Herd caribou to different types of infrastructure during winter and calculated ZOI for an early period (1985–1998) and a later period (1999–2012). They found ZOIs were larger (e.g., 18.6 miles and 11.5 miles from main roads for the early and late periods respectively; 6.8 miles and 3.7 miles for wells, trails, winter roads, and seismic lines for the early and late periods respectively) than those reported for the Central Arctic Herd during calving (up to 3.11 miles). Although the ZOIs for the Porcupine Caribou Herd declined in the later period, they concluded there was inadequate information to conclude the decline was due to habituation (Johnson and Russell 2014).

The ZOI is likely to vary with the type, frequency, and distribution of human activity. A level of displacement of approximately 2.49–3.11 miles observed at existing North Slope oil fields would be expected in the program area with similar development and mitigation design; however, the presence of subsistence hunting from roads adds additional uncertainty to this estimate. For that reason, hunting could result in additional displacement during the calving season and more displacement and lower tolerance of roads during other seasons. This effect would depend on the location, timing, and frequency of hunting. If hunting occurs away from roads, additional displacement would likely occur for some distance from off-road human activity.

Under all alternatives, terrestrial mammals are more prone to displacement from areas with consistently high levels of activity, such as near CPFs, airstrips, active construction, and busy sections of trunk roads. The most common disturbing stimulus associated with roads is vehicle traffic; 15 vehicles per hour or more has been shown to deflect caribou movements and delay road crossings at sites with pipelines and roads (Curatolo and Murphy 1986; Cronin et al. 1994). Severson et al. (2023) analyzed 2 years of GPS data for the Central Arctic Herd and found that although caribou in their study area crossed roads approximately 1.5 times per day on average during the mosquito and oestrid fly seasons, when insect harassment was not occurring the probability

of crossing a road declined with increasing traffic volume and caribou preferentially selected areas where the closest road had low levels of traffic. When insect harassment was predicted to occur (based on weather conditions) these responses to traffic volume were not evident. Caribou are highly motivated to reach insect harassment during these periods and Central Arctic Herd caribou will preferentially select roads, pads, and areas under buildings during periods of oestrid fly harassment (Pollard et al. 1996; Noel et al. 1998; Prichard et al. 2020b). Prichard et al. (2022) analyzed 3 years of aerial survey data and found that some displacement of maternal caribou from areas within 1.2–2.5 miles of a road occurred during calving even with very low levels of traffic, but no displacement was apparent from roads with low levels of traffic during the post-calving season.

Studies of Central Arctic Herd caribou have demonstrated that strong behavioral reactions are most common when caribou are within approximately 2,000 feet of roads (600m; Murphy and Curatolo 1987; Cronin et al. 1994; Prichard et al. 2022; Prichard and Welch 2024), but some of the strongest reactions, as measured in displacement distance, occur in response to humans on foot (Curatolo and Murphy 1983; Lawhead et al. 1993; Cronin et al. 1994, Stankowitz 2008). Limiting noise and human activity may lower the level of displacement of caribou. Calving caribou did not exhibit strong avoidance of an inactive drill rig in the calving range of the Central Arctic Herd suggesting that inactive infrastructure elicits less avoidance behavior (Prichard et al. 2022). Similarly, wild reindeer (the same species as caribou) exhibited more displacement from a mine when it was active than on holidays (Eftestøl et al. 2019), and the observed displacement of calving reindeer near wind turbines was more pronounced during operation of the wind turbines when turbines produced noise and the movement of the turbines was visible far away compared to construction of the wind turbines (Skarin et al. 2018).

Of the 1,563,500 acres in the program area, 728,300 acres (49.0 percent) are in areas used for annual calving grounds of the Porcupine Caribou Herd at least 40 percent of years; 882,500 acres (59.4 percent) are in areas used for annual calving grounds of the Porcupine Caribou Herd at least 30 percent of years; and 1,031,400 acres (69.4 percent) are in areas used for annual calving grounds of the Porcupine Caribou Herd at least 20 percent of years (**Map 3-31 in Appendix A; Table K-22 in Appendix K**). All of the area in the annual calving grounds of the Porcupine Caribou Herd (at least 30 percent of years) is thought to have low or medium HCP (**Table K-22 in Appendix K; Map 3-6 and Map 3-40 in Appendix A**). Severson et al. (2021) used models of current habitat selection during calving and post-calving to delineate currently used areas and to predict where calving and post-calving Porcupine Caribou Herd distributions will occur in future decades. A total of 76,700 acres and 589,100 acres in the program area are in the Porcupine Caribou Herd calving area and post-calving area, respectively, as delineated by Severson et al. (2021) for the period 2012–2018 (**Map 3-34 in Appendix A**). All of the program area may be used for calving in some years but estimates of the frequency of use in previous years and the predicted probability of use in future years provides additional information to compare among alternatives.

Although several potential demographic impacts of development on Central Arctic Herd caribou have been reported (NRC 2003; Cameron et al. 2005; Arthur and Del Vecchio 2009), the Central Arctic Herd increased in size between 1978 and 2010 before declining in size between 2010 and 2016, the herd has been increasing or stable since 2016 (Lenart 2015b, 2021; M. Nelson pers. comm.⁸). The nearby Teshekpuk Caribou Herd (TCH) increased more rapidly after recent declines in both herds and what the herd size of the Central Arctic Herd would have been in the absence of development is not known. The patterns of Central Arctic Herd

⁸Mark Nelson, ADFG, personal communication with Alex Prichard, ABR Inc., regarding 2022 herd size estimates of the Central Arctic Herd.

demography and behavior following development should be applied to the Porcupine Caribou Herd with caution for the following reasons:

- The Porcupine Caribou Herd has lower population growth rates and productivity (Russell and Gunn 2019)
- and the Porcupine Caribou Herd may be more dependent on summer forage than the Central Arctic Herd (Russell and Gunn 2019)
- Movements and demography of the Porcupine Caribou Herd are different from the Central Arctic Herd
- Concentrated calving density of the Porcupine Caribou Herd is much higher than the Central Arctic Herd
- The Porcupine Caribou Herd is at a historical high population (Caikoski 2020)
- Some hunting by local residents is likely to occur from roads in the program area
- The ACP is much narrower in the program area than near the Central Arctic Herd calving range which is likely to mean that there are fewer options for alternative calving areas if displacement from roads occurs during calving
- Alternative calving areas next to the Porcupine Caribou Herd calving grounds contain less high-quality forage, higher predator densities, and different climatic conditions, and they exhibit more topographic relief than do the current Porcupine Caribou Herd calving grounds (Clough et al. 1987; Griffith et al. 2002; Russell and Gunn 2019) and early calf survival is higher when the herd calves in the program area (Griffith et al. 2002; Russell and Gunn 2019)

If future development causes large-scale displacement of the Porcupine Caribou Herd from the calving grounds in the program area, the calving distribution would most likely shift to the east or southeast (Griffith et al. 2002) and displacement would be most likely to occur in years of early snowmelt when the Porcupine Caribou Herd is more likely to calve in the program area in the absence of development (Griffith et al. 2002; Russell and Gunn 2019; Severson et al. 2021). Comparison of mean annual survival rates of Porcupine Caribou Herd calves during June 1985 and between 1987 and 2001 showed that calf survival was lower in years when higher proportions of calves were born off the Coastal Plain and when less vegetative biomass (based on NDVI) occurred on the annual calving ground at the time of peak lactation (June 21; Griffith et al. 2002).

Using this model and previous hypothetical development scenarios, (Scenarios 2–5 from Tussing and Haley 1999) and assuming that the calving distribution would be displaced 2.49 miles from development, Griffith et al. (2002) predicted that calf survival would decline linearly with the distance that the annual calving ground was displaced and predicted an 8 percent decline in annual calf survival if there were full development of the current program area. This predicted decline in mean annual calf survival during June would have been large enough to halt herd growth, based on random population simulations of the Porcupine Caribou Herd (Walsh et al. 1995). Walsh et al (1995) reported that a decrease in adult survival by 2.4 percent or a decrease in calf survival by 4.6 percent would be enough to halt growth of the Porcupine Caribou Herd during an increasing phase in the herd size.

This analysis assumed no change in the shape of the calving distribution. It was developed from annual comparisons of mean calf survival but has not been tested for a spatial shift in calving each year. An eastward shift in the calving distribution would move the calving distribution into areas with higher predator densities (Young et al. 2002), into areas with lower quantity and quality of common caribou forage species, and into

lower proportions of the preferred tussock tundra and moist sedge-willow tundra vegetation types (Jorgenson et al. 2002), so a decline in calf survival or adult productivity is likely.

Russell and Gunn (2019) conducted a similar analysis, using growing degree days instead of the Normalized Difference Vegetation Index (NDVI). They estimated that the decline in calf survival from unconstrained development in the program area would be 10 percent, similar to the predicted impacts from Griffith et al. (2002). Any decline in the Porcupine Caribou Herd would also have indirect impacts on a variety of other wildlife species, including predators and other prey species.

Large aggregations of Porcupine Caribou Herd and Central Arctic Herd animals moving through the program area during periods of mosquito harassment in midsummer would have to navigate any infrastructure they encounter. Caribou may expend more energy, take more time, or exhibit reduced crossing success where traffic rates exceed 15 vehicles per hour and pipelines are within 300 feet of roads (Curatolo and Murphy 1986; Cronin et al. 1994; Murphy and Curatolo 1987; Johnson and Lawhead 1989; Lawhead et al. 1993). Severson et al. (2023) found that the probability of crossing a road declined with increasing traffic volume at all traffic rates when insect harassment was not occurring. When insect harassment was expected to be occurring based on weather conditions, the probability of crossing was highest at roads with moderate traffic levels. Johnson and Lawhead (1989) observed caribou groups that had difficulty navigating through areas where poorly designed roads encircled a small area resulting in a corralling effect on caribou.

Delays and deflections of caribou movements during this period would be partially mitigated by requiring the 7-foot minimum height at VSMs, placing elevated pipelines at least 500 feet from adjacent roads, and designing and orienting roads and pipelines to minimize crossings (ROP 23). These design considerations have been found to be adequate to maintain caribou passage for Central Arctic Herd animals with previous exposure to development (Murphy and Lawhead 2000, Lawhead et al. 200-6; Prichard et al. 2020a), although some delays and deflections may still occur (Johnson and Lawhead 1989; Cronin et al. 1994; Lawhead et al. 2006). The delays and deflections would likely be larger and more frequent for Porcupine Caribou Herd animals compared to Central Arctic Herd animals because the Porcupine Caribou Herd has less previous exposure to development, higher calving density, larger post-calving groups, and because there would be more hunting along the roads. Central Arctic Herd animals with little previous exposure to development were observed deflecting approximately 20 miles (32 km) to go around a road and pipeline (Smith and Cameron 1985). Deflections and delays of very large post-calving aggregations could result in large negative impacts on caribou. Delays in access to insect relief habitat and large deflections could result in high energetic costs, lower rates of foraging, lower quality forage, a decline in body condition, and high levels of trampling of forage in the project area. Declines in body condition can result in lower productivity and survival. Because caribou travel long distances during periods of mosquito harassment (Fancy et al. 1989, Prichard et al. 2014), post-calving aggregations are likely to encounter infrastructure frequently.

GPS-collared caribou in the Kuparuk oil field crossed roads or pads (and associated pipelines) an average of 1.2 times per day (based on straight-line distances between locations 2 hours apart) during the mosquito season and 2.1 times per day when mosquitoes were thought to be active, based on weather conditions and 1.1 times per day during the oestrid fly season and 3.4 times per day when oestrid flies were thought to be active, based on weather conditions (Prichard et al. 2020a). Similarly, Severson et al. (2023) found that caribou within their study area crossed roads approximately 1.5 times per day on average during the mosquito and oestrid fly season. Caribou are expected to be able to cross elevated pipelines without adjacent roads easier than roads and pipelines together. Central Arctic Herd caribou continued to use a coastal area during midsummer, with small changes in movement patterns, following the construction of a roadless elevated pipeline (Prichard et

al. 2018). Caribou crossed the pipeline repeatedly, but also tended to move parallel to it when it was orientated in a direction similar to their mosquito-relief movements resulting in fewer crossings than expected in the absence of the pipeline (Prichard et al. 2018).

Porcupine Caribou Herd post-calving aggregations can be much larger than Central Arctic Herd aggregations, but how that would affect crossing success is unknown. Russell and Gunn (2019) estimated that, between 2014 and 2017, seven Porcupine Caribou Herd post-calving aggregations to be between 21,000 and 121,000 animals. Caribou in these large aggregations used a large area in the central portion of the program area (**Map 3-39** in **Appendix A**). Some evidence suggests that large caribou groups have more difficulty crossing pipelines (Smith and Cameron 1985), but comparisons can be confounded by insect activity and limited by small sample sizes (Curatolo and Murphy 1986; Lawhead et al. 1993; Lawhead et al. 2006). Data are lacking on how well groups of over 100,000 caribou are able to navigate through oil field infrastructure (Russell and Gunn 2019), thus it is possible that these large groups will have a high level of difficulty crossing roads and pipelines. It is likely that these large post-calving aggregations will occur in the western portion of the project area with higher hydrocarbon potential more frequently as a result future climate warming (Severson et al 2021).

In addition, if hunting occurs from the roads during these movements, crossing rates may be lower and tolerance of roads is likely to be lower (Paton et al. 2017; Plante et al. 2018), although this would depend on the frequency, timing, and location of hunting. Hunting from motorized vehicles during the summer in the program area would likely be limited to roads and would be conducted only by local residents, which would limit the adverse effects of hunting on caribou distribution and movements. Extensive off-road human activity, if it occurred, would likely result in greater disturbance to caribou.

The annual harvest of caribou by Kaktovik residents is outlined in **Table N-3** in **Appendix N**. Some portion of this harvest could shift to program roads, or the total harvest could increase. Porcupine Caribou Herd animals may increase their use of mountain ridges instead of the coast for insect relief as a result of development in the program areas, which could lower the harvest in the area. Changes in caribou distribution during the calving or post-calving season could alter Porcupine Caribou Herd distribution patterns during other periods of the year in unpredictable ways.

During the oestrid fly season (mid-July to mid-August) elevated gravel roads and pads and shaded areas under buildings and pipelines may provide relief from insect harassment (White et al. 1975; Curatolo and Murphy 1986; Cronin et al. 1994; Pollard et al. 1996; Noel et al. 1998; Prichard et al. 2020a). This use of gravel roads and pads as well as the erratic movements of fly-harassed caribou also increases the potential for vehicle collisions.

The presence of roads and pipelines in the program area could also delay and deflect movements during spring and fall for caribou in the program area during those seasons. Research has found varied responses of caribou to roads during such migrations. Approximately 30 percent of collared female caribou (8 of 24 individuals) encountering the Red Dog Mine Road in northwestern Alaska during fall migration experienced long delays in crossing the road corridor, with the delays of these “slow crossers” averaging 11 times longer than those of “normal crossers” (33.3 days vs. 3.1 days; Wilson et al. 2016). Wild reindeer (the same species as caribou) in Norway were delayed approximately 5 days during spring migration at a highway corridor experiencing high levels of human activity, but when human activity was low during fall migration, the road did not appear to pose an obstruction (Panzacchi et al. 2013). Multiple caribou herds in Alaska currently have roads in their annual range and successfully cross them during seasonal movements (Bergerud et al. 1984; Boertje et al. 2012; Hatcher and Robbins 2021). Burson et al (2000) reported that only 1.3 percent of Denali Herd caribou

observed along the heavily regulated road in Denali National Park exhibited adverse reactions to traffic. The presence of roads, if not regulated, can also result in more human activity and non-local harvest of caribou, muskoxen, and other species. Hunting regulations can be used to mitigate many of the impacts from legal harvest.

Although animals of the Central Arctic Herd cross the Dalton Highway frequently (Prichard and Welch 2024), some collared TCH caribou, with little exposure to infrastructure, experienced multiple day delays crossing the Trans-Alaska Pipeline and Dalton Highway in fall and spring of 2003–2004 during an unusual migratory movement to the program area. Flooding of the Sagavanirktok River may have also delayed spring movements during those movements (Carroll 2005).

Caribou crossing success in the program area would vary by season, behavioral motivation, level of previous exposure to development, and traffic and human activity levels. Alteration of the timing of fall migration could affect some subsistence hunters by delaying access until caribou bulls are in rut and are no longer selected by subsistence hunters, but this is unlikely due to the low use of the program area by Porcupine Caribou Herd caribou in late summer.

Aircraft noise during take-offs and landings could result in the inability of nearby terrestrial mammals to hear biologically important sounds, such as predators, prey, or interspecific communication (Barber et al. 2010) and could lead to increased stress levels near the airstrip. Low-level aircraft may cause flight responses or temporary changes in caribou behavior (Maier et al. 1998; Reimers and Colman 2006), which could temporarily deflect or alter caribou behavior, potentially affecting hunting activities and hunting success for subsistence hunters (as described in **Section 3.4.3**, Subsistence Uses and Resources).

Most program-related aircraft operators would maintain minimum flight altitudes which would reduce disturbance of wildlife and subsistence hunters. ROP 34 requires an aircraft use plan and would place limits on aircraft altitude and landings near known subsistence hunting camps and cabins and in the Porcupine Caribou Herd calving area (all action alternatives). In addition, Valkenburg and Davis (1985), reported that caribou in a herd with frequent aircraft overflights exhibited less frequent and less severe reactions to aircraft than caribou in a herd with less exposure to aircraft and concluded that this difference in reactions is likely either due to habituation to aircraft or aircraft being associated with hunting from motor vehicles in one herd. Some of the limited research on aircraft disturbance on caribou involved military jets. Military jets are louder than the typical aircraft likely to use the program area, but they are also faster, potentially resulting in more intense disturbance for a shorter duration. Although the effects of military aircraft on caribou behavior may differ somewhat from the effects of more typical aircraft using the program area, these studies provide useful information on the range of caribou behavior likely to be encountered (Stinchcomb et al. 2020). Maier et al. (1998) found that caribou responses to low-level military jet overflights were low in late winter, moderate in midsummer, and strongest during post-calving, with females accompanied by young showing the strongest responses. During the post-calving season, caribou subjected to direct overflights at low altitudes by military jets moved farther and were more active than animals that were not overflown. Lawler et al. (2005) found that responses to military overflights during calving were variable but generally mild, and overflights did not result in higher calf mortality or increased movements of cow/calf pairs.

All action alternatives would be subject to ROP 23. ROP 23 incorporates oil field design specifications that have been found to minimize disruptions to caribou movements in existing oil fields (Shideler 1986; Cronin et al. 1994; Murphy and Lawhead 2000; Lawhead et al. 2006). These include requirements relating to pipeline height, pipeline road separation distance, road and pipeline orientation, caribou crossing ramps, and pipeline coating, and would require a vehicle management plan to be developed. As previously described, there is

considerable uncertainty regarding how well very large post-calving aggregations of Porcupine Caribou Herd animals would be able to navigate oilfield infrastructure even with these design features that have been used for the smaller Central Arctic Herd.

For all action alternatives many of the same impacts that occur during construction would persist throughout future drilling and operation, although some activities, such as gravel hauling, gravel fill placement, and pipeline construction would end and others, such as vehicle and air traffic volume, would continue at a lower frequency. Drill rigs and associated activity would introduce additional noise disturbance. Because of the relative levels of activity associated with each phase, the potential impacts during development drilling would be greater than during production after drilling ceases. Disturbance from human activities and traffic on roads, pads, and airstrips would continue through drilling and operations; however, the frequency of disturbance would decline during operations, in comparison with construction and development drilling.

The potential effects of habitat loss are long term and would continue throughout drilling and operations. Additional habitat alterations from the impacts of snowdrifts, dust, thermokarst, and ponding would continue during operations. Accidental oil discharges in the program area may affect terrestrial mammals, depending on the location and size of the spills (see **Section 3.2.11**). During exploration and construction, the primary releases would be accidental spills from vehicles, storage tanks, marine barges and docks, aircraft, and equipment during transport or fueling and during pipeline hydrotesting; however, the frequency of spills would be limited by ROPs requiring adequate oil spill prevention and response plans. Most potential spills would be fewer than 100 gallons and restricted to ice or gravel roads and pads, never reaching the tundra, but larger tundra spills are possible. Dust generated during future creation of and travel on gravel roads may add toxic metals to roadside vegetation that mammals forage (Walker and Everett 1987; Shoty et al. 2016; Knight et al. 2017). Gravel mining results in direct loss of habitat and requires loud blasting and heavy machinery that is likely to cause local disturbance of terrestrial mammal species including caribou and muskoxen.

Throughout future drilling and operations, the assumption is that most maternal female caribou with young calves would continue to avoid active infrastructure by up to 3.11 miles and that caribou moving through the program area during the post-calving and insect seasons could experience delays and deflections when encountering roads and pipelines, especially roads with high rates of traffic.

Roads and well pads would be abandoned, and the sites reclaimed after the wells stop being economically productive. This is expected to occur from 19 to 85 years after the lease sale (**Appendix C**). Equipment and gravel would be removed, and the areas would be revegetated (ROP 35). This would add back small amounts of additional terrestrial mammal forage. Wildlife habitat quality after reclamation may vary, depending on the effectiveness of reclamation and sensitivity of ecological communities to disturbance. Reclamation could disturb terrestrial mammals in the area, but the impacts would vary, depending on the timing of the activity.

Alternative B

Under Alternative B, there would be 2,000 acres of estimated surface development and an approximately 172 miles of gravel roads constructed (**Appendix C**). Alternative B would open the entire program area to lease sales, and lease-sale specific seismic activity with the potential impacts from seismic exploration described above.

Using the hypothetical schematic anchor-field footprint (one CPF and 6 radiating 8-mile access roads to 6 drill pads, including an STP pad and a 30-mile access road, totaling 750 acres; **Appendix C**), the BLM calculated estimates of the area within 3.11 miles for potential displacement of calving caribou (301,000 acres). Using these schematic footprints and extrapolating to a 2,000-acre maximum gravel footprint, it

estimated the total acres of potential disturbance and displacement is 803,000 acres; however, this number would vary with different road and pad scenarios, and some portion of this area could be overlapping the buffer from other development, outside of the program area, or in the ocean.

Under Alternative B, 358,100 acres would be closed to surface occupancy. The 803,000 acres of potential Porcupine Caribou Herd calving displacement area (based on a displacement of 3.11 miles) would affect up to 66.6 percent of the remaining area, although some of this buffer area would likely fall into the locations with NSO or out of the program area (**Map 3-40**, Porcupine Caribou Herd, Alternatives B, C, D, and D2 in **Appendix A**).

Of the highest use Porcupine Caribou Herd calving area (used in greater than 40 percent of years), Alternative B would place 135,500 acres (18.6 percent) off limits to surface occupancy, place TLs on 564,900 acres (77.6 percent) and leave 27,900 acres (3.8 percent) subject only to STC (**Table K-22** in **Appendix K**). Of the highest use Porcupine Caribou Herd post-calving area (used in greater than 40 percent of years), Alternative B would place 113,700 acres (20.4 percent) off limits to surface occupancy. It would place TLs on 371,300 acres (66.5 percent) and leave 73,600 acres (13.2 percent) subject only STC (**Table K-23** in **Appendix K**).

Severson et al. (2021) delineated areas that were expected to be important for calving and post-calving for the Porcupine Caribou Herd in future decades. Under Alternative B, a total of 332,000 acres of the predicted future Porcupine Caribou Herd calving area for the years 2050–2059 (as predicted by Severson et al. 2021) would be open to leasing and closed to surface occupancy, although only 119,000 acres would be open under STC (**Table K-24** in **Appendix K**). A total of 658,400 acres of the predicted future Porcupine Caribou Herd post-calving area for the years 2050–2059 (as predicted by Severson et al. 2021) would be open to leasing and available for surface occupancy, although only 323,300 acres would be open under STC (**Table K-25** in **Appendix K**).

Alternative B would suspend major construction activities and place limits on vehicle traffic, vehicle speeds, and limit flight altitudes in the Porcupine Caribou Herd primary calving habitat area (Lease Stipulation 7 and ROP 23) during the calving period (May 20 to June 20). Density of infrastructure as well as such activity as vehicle traffic, aircraft, and human foot traffic affects caribou use of calving areas (Curatolo and Murphy 1986; Dau and Cameron 1986; Cameron et al. 2005). Some level of displacement of calving caribou has been shown to occur even with low levels of traffic (Dau and Cameron 1986; Lawhead 1988; Lawhead et al. 2004; Prichard et al. 2022), while caribou avoidance of roads in other seasons may be positively related to the intensity of the disturbance (Leblond et al. 2013; Panzacchi et al. 2013). As a result, the limitations on vehicle and aircraft use and construction activity outlined in the Lease Stipulation 7, ROP 23, and ROP 34 would lower the frequency and intensity of caribou disturbance; however, future infrastructure development, even with low levels of human activity in the area of concentrated calving for the Porcupine Caribou Herd, could lead to displacement of calving caribou and decreased calf survival or a decline in caribou body condition, as described above. Calving outside the primary calving area but inside the program area, although expected to occur in fewer years, would be subject only to limitations in ROP 23 and ROP 34. Calving caribou would be likely be displaced from areas of development in those areas in years when calving occurs west of the primary calving area. More calving is likely to occur in the western program area in future years and 406,900 acres of the predicted future Porcupine Caribou Herd calving area for the years 2050–2059 (as predicted by Severson et al. 2021) would be open to leasing (**Table K-24** in **Appendix K**).

The Porcupine Caribou Herd calving habitat area would not be subject to specific lease stipulations after June 20, although the area is used extensively by the Porcupine Caribou Herd during the post-calving period (PCTC 1993; Russell and Gunn 2019); it would still be subject to the limitations in ROP 23 and ROP 34. As a result,

there could be delays and deflections of movements during the post-calving period when caribou groups encounter infrastructure, as described above. Central Arctic Herd caribou exhibit less displacement from properly designed infrastructure during the post-calving period, compared with the calving period (Smith et al. 1994; Lawhead et al. 2004; Haskell et al. 2006; Prichard et al. 2020a; 2022); however, there is a lack of information on how well groups of over 100,000 caribou navigate oil field infrastructure and subsistence hunting along program area roads could also hinder movements, as described previously.

Alternative B would place an area predicted to contain 0.50–3.56 percent of the Central Arctic Herd during different summer seasons off limits to surface occupancy, place TLs on an area predicted to contain 0.022–0.80 percent of the Central Arctic Herd during different summer seasons and use only STC in an area predicted to contain 1.34–7.31 percent of the Central Arctic Herd during different summer seasons (**Table K-26** in **Appendix K**). Because these percentages represent seasonal averages, the percentage of Central Arctic Herd animals moving through these areas during a season may be substantially higher (**Map 3-36** and **Map 3-37**, in **Appendix A**), especially during mid-summer when movement rates are highest. Much of the seasonally important areas for the Central Arctic Herd and Porcupine Caribou Herd in the program area are open to surface occupancy but subject to TLs under Alternative B; the potential impacts of this alternative on caribou would depend, in large part, on how well these TLs avoid displacement of calving caribou and impediments to caribou movements during other times of year when caribou are present. Results of Severson et al (2021) indicates future shifts in the areas used for calving and post-calving habitat could result in increasing use of areas of STC during these important seasons (**Tables K-24** and **K-25** in **Appendix K**).

Under this alternative, surface occupancy would be excluded from areas within 0.5 and 1 mile of selected river corridors (Lease Stipulation 1); this would limit disturbance on some potentially important Porcupine Caribou Herd calving areas. It would also lower potential impacts on moose and muskoxen if these species increase in the program area in the future. Although Young and McCabe (1998) did not test specifically for it in their Arctic Refuge area, they found that the mean distance from rivers was closer than expected for calving Porcupine Caribou Herd caribou but not for grizzly bears. Wilson et al. (2012) found that female Teshekpuk Herd caribou avoided riverine habitats at both the landscape and patch scale of selection during calving. Jakimchuk et al. (1987) found that female Central Arctic Herd caribou avoided riverine habitat during calving but selected it later in the summer; males selected riverine habitats during that period, although use of riparian areas was partially confounded by industrial development in one river corridor. Prichard et al. (2020a) found that Central Arctic Herd caribou avoided riparian areas during calving near the Kuparuk oilfield.

Future development along coastal areas could cause delays and deflections of coastal movements of the Central Arctic Herd and Porcupine Caribou Herd during midsummer periods of mosquito harassment. Alternative B requires an impact and conflict avoidance and monitoring plan to mitigate effects of exploration and development on wildlife within 2 miles of the coast (Lease Stipulation 9); however, it does not limit infrastructure in coastal areas. The Porcupine Caribou Herd can use either coastal areas or mountain ridges for mosquito relief habitat (Walsh et al. 1992; Russell et al. 1993); increased development near the coast may result in more use of inland ridges during the post-calving season with potential impacts on subsistence harvest. It could also have negative nutritional impacts on caribou if coastal forage is of better quality than ridges during some years.

Russell and Gunn (2019) used a model of caribou activity and energy intake to predict that development would result in a herd decline of 17 and 18 percent after 10 years, for a starting population of 218,000 and 100,000 animals, respectively, under assumptions about development that were similar to Alternative B. The

assumptions of the model and potential limitations in the assumptions of the model are described in the Cumulative Impacts section below.

Alternative C

Under Alternative C, an estimated 1,464 acres of surface disturbance would occur and an estimated 134 miles of gravel roads constructed (**Appendix C**). Only areas available for lease sale would be available for seismic exploration, with the potential impacts described above. Alternative C would close 476,600 acres of the Porcupine Caribou Herd primary calving habitat area to lease sales.

Under Alternative C, 1,234,500 acres (79 percent of the program area) would be unavailable for lease sale or have NSO restrictions. The potential 588,000 acres of potential Porcupine Caribou Herd calving displacement (based on a displacement of 3.11 miles from the 750-acre schematic footprint and extrapolating to 1,464 acres of gravel) is larger than the 329,000 acres of the program area remaining open to surface occupancy.

Alternative C would not allow CPFs in the Porcupine Caribou Herd post-calving habitat area and would limit total infrastructure density in this area (Lease Stipulation 8). Sections of road would also be evacuated whenever 100 or more crossings of caribou appear to be imminent in this area (Lease Stipulation 8). The density of infrastructure affects caribou use of an area during calving and creates additional barriers for caribou movements during summer (Nellemann and Cameron 1998; Cameron et al. 2005); hence, limits on the density of development in areas closed to lease sales or with NSO restrictions would improve the ability of caribou to navigate through those areas.

Of the highest use Porcupine Caribou Herd calving area (used in greater than 40 percent of years), Alternative C would place 714,000 acres (98.0 percent) off limits to lease sales or surface occupancy (511,700 would be off limits to lease sales and 202,200 would be off limits to surface occupancy), would control surface use in 5,400 acres (0.1 percent), and would use only STC on the remaining 8,900 acres (1.2 percent; **Table K-22** in **Appendix K**). Of the highest use Porcupine Caribou Herd post-calving area (used in greater than 40 percent of years), Alternative C would place 501,500 acres (89.8 percent) off limits to lease sales or surface occupancy (409,400 would be off limits to lease sales and 92,100 would be off limits to surface occupancy) and would control surface use in or use only STC on the remaining 56,800 acres (10.2 percent; **Table K-23** in **Appendix K**).

Under Alternative C, a total of 149,600 acres of the predicted future Porcupine Caribou Herd calving area for the years 2050–2059 (as predicted by Severson et al. 2021) would be open to leasing, although only 13,100 acres would be open under STC (**Table K-24** in **Appendix K**). A total of 469,900 acres of the predicted future Porcupine Caribou Herd post-calving area for the years 2050–2059 (as predicted by Severson et al. 2021) would be open to leasing, although only 64,400 acres would be open under STC (**Table K-25** in **Appendix K**).

Areas unavailable for leasing would not experience seismic surveys under this alternative. The remaining areas would be subject to lease-specific seismic exploration. There could be impacts on terrestrial mammals, as described above, such as destroying under-snow small mammal habitat, disturbing denning mammals, crushing forage species, and altering snowmelt timing. This alternative would prohibit winter activity within 1.0 mile of polar bear denning habitat in some areas (Lease Stipulation 5); these buffers would likely also include some grizzly bear dens, due to similar habitat preferences.

Alternative C would require either no leasing or NSO restrictions for areas within 0.5 to 4 miles of selected rivers (Lease Stipulation 1), areas of the Canning River delta (Lease Stipulation 2), areas within 1 to 4 miles

of selected springs and aufeis, the area within 3 miles of the east bank of the Canning River (Lease Stipulation 3), all 721,200 acres of the Porcupine Caribou Herd primary calving habitat area (Lease Stipulation 7), and areas within 3 miles of the wilderness border (Lease Stipulation 10). Because these stipulations do not allow surface development, there would be little change from Alternative A in most areas and limited impacts would be expected in these areas for Alternative C. There could, however, be more air traffic in some areas. Development would occur in some NSO areas through waivers or exceptions, and the impact of adjacent development could impact animals within NSO areas. The NSO restrictions near rivers and on the Canning River delta would make it unlikely that development would hinder caribou movements in these areas, although some roads are likely to occur in NSO areas through waivers and exceptions. The Canning River delta is used by large numbers of Central Arctic Herd caribou during midsummer in some years (**Map 3-36** and **Map 3-37**, in **Appendix A**), and one muskox group has often used the area along the Canning River in recent years (Lenart 2021b); limiting infrastructure in this area would limit alterations to the movements of this group.

Alternative C would not allow wells or CPFs and would restrict vessel activity within 2 miles of the coast (Lease Stipulation 1). Porcupine Caribou Herd and Central Arctic Herd caribou form large, fast-moving aggregations along the coast in response to mosquito harassment; hence, this lease stipulation would lower the potential for infrastructure to hinder these movements. Pipelines and roads could still be allowed by the BLM Authorized Officer; however, with proper structure design, caribou are generally able to navigate them during the mosquito season, especially following repeated exposure to oil development and with low levels of vehicle traffic on adjacent roads (Curatolo and Murphy 1986; Cronin et al. 1994; Murphy and Lawhead 2000; Lawhead et al. 2006). Despite this, there is a lack of information on how well groups of over 100,000 caribou navigate oil field infrastructure and subsistence hunting along program roads could hinder movements, as described above. Delays and deflections could be more pronounced in the initial years following development.

Alternative C would place an area predicted to contain 0.30–0.73 percent of the Central Arctic Herd during different summer seasons off limits to lease sales and 0.96–6.32 percent off limits to surface occupancy, would control use in an area predicted to contain 0.18–0.94 percent of the Central Arctic Herd during different summer seasons, and would use STC on an area predicted to contain 0.62–3.46 percent of the Central Arctic Herd during different summer seasons (**Table K-26** in **Appendix K**). Because these percentages represent seasonal averages, the percentage of Central Arctic Herd animals moving through these areas during a season may be substantially higher especially in mid-summer when caribou movement rates are highest.

Based on the previously recorded calving distribution, most of the seasonally important areas for the Porcupine Caribou Herd in the program area are closed to surface occupancy under Alternative C, but some areas used for calving in less than 40 percent of years would be subject to only STC; hence, in the absence of large shifts in calving distribution, little displacement of calving Porcupine Caribou Herd caribou is expected during most years, but higher frequency of displacement could occur in the future if Porcupine Caribou Herd caribou calves farther west as predicted by Severson et al. (2021). Additional areas closed to surface occupancy compared to Alternative B would provide additional options for calving caribou to select areas away from infrastructure.

Russell and Gunn (2019) used a model of caribou activity and energy intake to predict that development would result in a herd decline of 7 and 9 percent after 10 years, for a starting population of 218,000 and 100,000 animals, respectively, under assumptions about development that were similar to Alternative C. Assumptions of the model and potential limitations in the assumptions of the model are described in the Cumulative Impacts section below.

Alternative D

Under Alternative D, 1,524,000 acres (97 percent of the program area) would be closed to lease sales or have NSO restrictions. Because 797,700 acres would be unavailable for leasing and an additional 726,300 acres would be subject to NSO, Alternative D would have lower impacts on terrestrial mammals than Alternatives B and C. Only 4,900 acres of Porcupine Caribou Herd calving grounds used more than 40 percent of years would be open to leasing under STC (**Table K-22 in Appendix K**) and only 100 acres of current and predicted future Porcupine Caribou Herd calving areas (as predicted by Severson et al. 2021) would be open to leasing under STC (**Table K-24 in Appendix K**). Similarly, no acres of Porcupine Caribou Herd post-calving grounds used more than 40 percent of years would be open to leasing under STC (**Table K-23 in Appendix K**). Only 400 acres of the current or predicted future Porcupine Caribou Herd post-calving areas (as predicted by Severson et al. 2021) would be open to leasing under STC (**Table K-25 in Appendix K**).

Alternative D would place an area predicted to contain 0.55–1.86 percent of the Central Arctic Herd during different summer seasons off limits to lease sales and 1.47–9.21 percent off limits to surface occupancy. It also would control use in an area predicted to contain 0.01–0.07 percent of the Central Arctic Herd during different summer seasons. In addition, it would use STC in an area predicted to contain 0.01–0.15 percent of the Central Arctic Herd during different summer seasons (**Table K-26 in Appendix K**). Because these percentages represent seasonal averages, the percentage of Central Arctic Herd animals moving through these areas during a season may be substantially higher, especially in mid-summer when caribou movement rates are highest.

Seismic exploration could occur on the 765,800 acres available to leasing with the potential impacts described above, although it would be most likely to occur in areas where leasing occurred.

Although only 39,500 acres are available for leasing and allow surface occupancy, it is likely that roads would cross areas with NSO restrictions to access leased areas. ANILCA Section 1110(b) directs that the Secretary shall give such rights as are necessary to assure adequate and feasible access for economic and other purposes to owners or operators with valid occupancy subject to reasonable regulations issued by the Secretary to protect the natural and other values of such lands. Alternative D estimates the amount of surface disturbance at 1,040 acres and an estimated 100 miles of gravel road would be constructed (**Appendix C**). The 418,000 acres of potential Porcupine Caribou Herd calving displacement (based on a displacement of 3.11 miles from the 750-acre schematic footprint and extrapolating to 1,040 acres of gravel) is much larger than the 46,700 acres of the program area remaining open to surface occupancy; therefore, some areas within the NSO or no leasing areas would be within 3.11 miles of roads or pads where some displacement of calving caribou is likely to occur. As previously described, some calving would still occur within 3.11 miles of roads and pads, and the amount of avoidance would likely decline with distance. There also would be some development within 3.11 miles of post-calving habitat, which could cause delays or deflections of Porcupine Caribou Herd and Central Arctic Herd animals during post-calving movements.

Alternative D would require developing an Adaptive Research and Management Plan (ARMP) to identify research needs; carrying out monitoring and research efforts; evaluating existing/ongoing management and mitigation efforts; quantifying impacts; and identifying management changes, when necessary (Lease Stipulation 6; ROP 23, 23.1). The ARMP should effectively mitigate some impacts on terrestrial mammals by making changes in design or human activities based on observed impacts on terrestrial mammals. The ability to make changes to the design of infrastructure after construction would be limited; however, if development occurs in different stages, any negative impacts observed during monitoring of early stages of development can be used to modify construction, design, or human activity during subsequent stages in order

to mitigate those impacts. In addition, the ARMP can modify the timing, location, and patterns of human activity and vehicle and air traffic in ways that would lessen displacement or obstructions of movements of terrestrial mammals in the area. Many mitigation methods for oilfield design have been implemented and studied in the range of the Central Arctic Herd (Cronin et al. 1994; Murphy and Lawhead 2000; Lawhead et al. 2006) and many of these design modifications are required under ROP 23. The potential impacts of development to the Porcupine Caribou Herd could be different from the Central Arctic Herd for reasons previously described; an ARMP would support monitoring, assessment of impacts, and alterations in oilfield designs and practices to lessen impacts that occur.

Because there is uncertainty regarding how well very large groups of caribou would be able to navigate through oilfield infrastructure (Russell and Gunn 2019), ROP 23 would require radio collar data monitoring and identifying large aggregations (>5000 animals) within 19 miles (30 kilometers) of infrastructure and would require the development of an Emergency Closure Plan that would be implemented to facilitate these movements by large groups of Porcupine Caribou Herd animals that are most likely to occur during the post-calving period. Under ROP 23, some groups of less than 5000 animals that do not trigger the Emergency Closure Plan may still be impacted and have difficulty crossing infrastructure.

Some evidence suggests that caribou exhibit limited displacement from inactive infrastructure (Prichard et al. 2022), therefore, halting activity at certain locations or times may mitigate impacts on caribou. Limitations on development that can occur on the Canning River delta (Lease Stipulations 1 and 2) would lower potential impacts on the Central Arctic Herd caribou using that area for insect-relief.

Lease Stipulation 9 puts limits on the amount and types of infrastructure allowed in Porcupine Caribou Herd post-calving habitats, and it puts TLs on activities from no later than May 15 through no earlier than July 28. These restrictions would limit how much infrastructure large post-calving groups would encounter and lower the probability of significant delays or deflections of movements as a result of infrastructure and traffic. From May 15 to July 28, traffic would be temporarily stopped to allow crossing by 10 or more caribou; sections of road would be evacuated whenever a large number of caribou (approximately 100 or more) approach the road within 2.0 miles; and speed limits of 15 miles per hour would be enforced when caribou are within 2.0 miles of the road. Maternal caribou exhibit some displacement from roads even with low traffic levels (<8 vehicles/day) during calving (Prichard et al. 2022), but evacuating roads may allow calving to occur near roads and lowering traffic levels is likely to facilitate caribou crossing roads. Additional research is needed to determine if lower speed limits would lead to lower levels of displacement or would facilitate crossings. Although slower traffic may appear less threatening to caribou, vehicles traveling slower are present for a longer period of time. Lower speed limits would lower the risk of mortality due to vehicle collisions. Vehicle use would be minimized through the use of a vehicle use management plan (ROP 23) and aircraft would have to maintain altitudes of 2,000 feet above ground level when over calving and post-calving areas, unless doing so would endanger human life or violate safe flying practices. Aircraft flying at this altitude would be unlikely to have strong impacts on caribou distribution or movements.

Because of the limited area available to leasing and surface occupancy, as well as controlled use and TLs required under Alternative D, many of the potential impacts on caribou from development would be avoided. The remaining impacts that would occur could be partially mitigated through the use of an ARMP that would make adjustments to human activities or new project designs based on the results of monitoring conducted during initial development stages.

Russell and Gunn (2019) used a model of caribou activity and energy intake to predict the impact of development on the size of the Porcupine Caribou Herd. There is no corresponding prediction for Alternative

D, but these alternatives have more protections for caribou than Alternative D2 in the Final Leasing EIS (BLM 2019a). As such, the predicted declines are likely to be lower than the predicted declines of 6 and 9 percent for a starting population of 218,000 and 100,000, respectively for Alternative D2 of the Final Leasing EIS. Assumptions of the model and potential limitations in the assumptions of the model are described in the Cumulative Impacts section below.

Alternative D2

Under Alternative D2, only 400,000 acres would be open to lease sales and 231,700 of those acres would have NSO restrictions, the lowest acreage available to leasing of any action alternative. No acres of Porcupine Caribou Herd calving grounds used more than 30 percent of years would be open to leasing or surface occupancy (**Table K-22 in Appendix K**). A total of 15,900 of future predicted Porcupine Caribou calving areas (in 2050–2059 as predicted by Severson et al. 2021) would be open to controlled surface use and 3,100 acres would be open with timing limitations, but only 8,000 acres of current and predicted future Porcupine Caribou Herd calving areas would be open to leasing under STC (**Table K-24 in Appendix K**). Similarly, no acres of Porcupine Caribou Herd post-calving grounds used more than 40 percent of years would be open to leasing under STC (**Table K-23 in Appendix K**). Only 300 acres of the current and 1,600 of the predicted future Porcupine Caribou Herd post-calving areas (as predicted by Severson et al. 2021) would be open to leasing under STC (**Table K-25 in Appendix K**).

Alternative D2 would place an area predicted to contain 0.57–2.76 percent of the Central Arctic Herd during different summer seasons off limits to lease sales and 1.15–8.20 percent off limits to surface occupancy. It also would control use in an area predicted to contain 0.02–0.19 percent of the Central Arctic Herd during different summer seasons. In addition, STC would apply to an area predicted to contain 0.06–0.57 percent of the Central Arctic Herd during different summer seasons (**Table K-26 in Appendix K**). Because these percentages represent seasonal averages, the percentage of Central Arctic Herd animals moving through these areas during a season may be substantially higher, especially in mid-summer when caribou movement rates are highest.

Seismic exploration could occur on the 400,000 acres available to leasing with the potential impacts described above, although it would be most likely to occur in areas where leasing occurred.

Although only 168,300 acres are available for leasing and allow surface occupancy, it is likely that roads would cross areas with NSO restrictions to access leased areas. ANILCA Section 1110(b) directs that the Secretary shall give such rights as are necessary to assure adequate and feasible access for economic and other purposes to owners or operators with valid occupancy subject to reasonable regulations issued by the Secretary to protect the natural and other values of such lands. Alternative D2 estimates the amount of surface disturbance at 995 acres and an estimated 98 miles of gravel road would be constructed (**Appendix C**). The 380,200 acres of potential Porcupine Caribou Herd calving displacement (based on a displacement of 3.11 miles from the 735-acre schematic footprint and extrapolating to 995 acres of gravel) is much larger than the 168,300 acres of the program area remaining open to leasing and surface occupancy; therefore, some areas within the NSO or no leasing areas would be within 3.11 miles of roads or pads likely resulting in some displacement of calving and post-calving caribou as described for Alternative D.

Alternative D2 would require developing an ARMP to identify research needs; carrying out monitoring and research efforts; evaluating existing/ongoing management and mitigation efforts; quantifying impacts; and identifying management changes, when necessary (Lease Stipulation 6; ROP 23, 23.1), as described for Alternative D. Alternative D2 would also make all areas within 2 miles of the coast NSO (Lease Stipulation 9). Although some development along the coast is likely to be allowed through exceptions to access the coast,

this lease stipulation would limit obstructions to large aggregations of caribou moving along the coast during periods of mosquito activity.

Because there is uncertainty regarding how well very large groups of caribou would be able to navigate through oilfield infrastructure (Russell and Gunn 2019), ROP 23 would require radio collar data monitoring and identifying large aggregations (>5000 animals) within 19 miles (30 kilometers) of infrastructure and would require the development of an Emergency Closure Plan that would be implemented to facilitate these movements by large groups of Porcupine Caribou Herd animals that are most likely to occur during the post-calving period as described for Alternative D.

Limitations on development that can occur on the Canning River delta (Lease Stipulations 1 and 2) would lower potential impacts on the Central Arctic Herd caribou using that area for insect-relief as described for Alternative D.

Design modifications are required under ROP 23 and restrictions under Lease Stipulation 9 would limit impacts as described for Alternative D. Because Alternative D2 limits infrastructure to the western and northwestern sections of the program area, impacts to calving and post-calving caribou would be diminished compared to Alternatives B, C, and D. The western portion of the program area currently gets less use during calving, but it has been used in the past and the calving distribution is expected to move west with a warming climate (Russell and Gunn 2019, Severson et al. 2021). Limiting infrastructure to this more constrained area does increase the likelihood that suitable alternative areas for calving would be available relative to other action alternatives. This western portion of the program area is used during midsummer by the Central Arctic Herd in some years, but limitations on development on the Canning Delta would help to lower the potential impacts on this herd.

Because of the limited area available to leasing and surface occupancy, as well as controlled use and TLs required under Alternative D2, many of the potential impacts on caribou from development would be avoided. The remaining impacts that would occur could be partially mitigated through the use of an ARMP that would make adjustments to human activities or new project designs based on the results of monitoring conducted during initial development stages.

Russell and Gunn (2019) used a model of caribou activity and energy intake to predict the impact of development on the size of the Porcupine Caribou Herd. There is no corresponding prediction for Alternative D2, but these alternatives have more protections for caribou than Alternative D2 in the Final Leasing EIS (BLM 2019a). As such, the predicted declines are likely to be lower than the predicted declines of 6 and 9 percent for a starting population of 218,000 and 100,000, respectively for Alternative D2 of the Final Leasing EIS. Assumptions of the model and potential limitations in the assumptions of the model are described in the Cumulative Impacts section below.

Transboundary Impacts

Some individuals from most large mammal species using the program area would cross the international boundary; however, because of the consistent movements across the border and the importance for subsistence, the Porcupine Caribou Herd has the most substantial transboundary issues. Dramatic changes in the size of the Porcupine Caribou Herd would also have cascading ecological effects on other terrestrial mammals in the area, most directly on predator species and other prey species, many of which also cross the international boundary.

The importance of the calving and post-calving season for the Porcupine Caribou Herd means that any potential demographic impacts of development in the program area would have impacts on subsistence and other users in Canada. The Porcupine Caribou Herd is covered by the Agreement between the Government of Canada and the Government of the United States on the Conservation of the Porcupine Caribou Herd. It provides for the coordinated conservation of the herd and established the International Porcupine Caribou Board and the Porcupine Caribou Technical Committee.

The potential impacts of the different alternatives on the demography of the Porcupine Caribou Herd would have transboundary impacts on subsistence hunting by residents, hunting by visitors, recreation, and tourism related to the Porcupine Caribou Herd. As described above and under cumulative impacts, Alternative B allows more development in Porcupine Caribou Herd calving areas, and there would be more potential obstacles to movement in post-calving areas of use. This alternative would, therefore, have more potential for population-level impacts on the Porcupine Caribou Herd (Russell and Gunn 2019; Russell et al. 2021). Central Arctic Herd caribou rarely cross into Canada, with the exception of individuals that have joined the Porcupine Caribou Herd (Prichard et al. 2020b); therefore, there are few transboundary issues associated with that herd. Moose, muskoxen, wolverine, wolves, and grizzly bears are also species that are important to subsistence and/or non-local hunters and likely to cross the border and could be impacted by development.

Cumulative Impacts

Most terrestrial mammals in the program area currently have little interaction with infrastructure. There is permanent development associated with the community of Kaktovik as well as use of the area by subsistence hunters, hunters from outside the ACP, scientists, recreationists, and eco-tourists. Far-ranging species such as caribou may encounter the Dempster Highway and other development in the Yukon (Johnson and Russell 2014; Russell and Gunn 2019), communities south of the program area, or oil and gas development west of the program area. Porcupine Caribou Herd caribou could occasionally encounter the Dalton Highway during winter, although the highway is generally west of their herd range. Caribou of the Central Arctic Herd have had some interaction with the Dalton Highway and oil and gas development for approximately 50 years (White et al. 1975).

A variety of different development projects could occur within the ranges of the Central Arctic Herd and Porcupine Caribou Herd. Future development with the largest potential to affect terrestrial mammals include potential all-season roads and snow trails (see **Appendix G**), resulting in the impacts on terrestrial mammals described above.

A potential snow trail would have limited impacts on caribou because few caribou are in the program area in the winter, but it could have impacts on other terrestrial mammals that use the program area in the winter or may have dens along the route. The ASTAR project proponents are examining the potential for a network of roads across the ACP. Infrastructure to support oil and gas development in the program area may facilitate these and other potential development projects. Road construction under the action alternatives would contribute to effects from an expanded road network that could displace calving, present obstacles to caribou movement, and change hunter access to the region.

Multiple ongoing and potential development projects west of the program area (see **Appendix G**) could alter the behavior and movements of Central Arctic Herd caribou. Based on predictive models, changes in caribou behavior would likely occur as a consequence of disturbance and could result in energetic costs that could have demographic impacts at high frequencies of occurrence (Murphy et al. 2000). There is already extensive development on the summer range of the Central Arctic Herd, but higher density development may result in

more displacement and more difficulty navigating oilfields with unknown impacts on body condition, survival, and reproduction.

Additional development could occur on private land near Kaktovik and use of roads by local hunters to achieve summer and winter access to subsistence hunting areas may alter the distribution of hunting in the area and could further displace caribou and other mammals away from gravel roads, potentially lowering tolerance of roads and pads in seasons other than calving (Paton et al. 2017; Russell and Gunn 2017; Plante et al. 2018). Displacement of calving caribou by active roads is likely to persist despite repeated annual exposure, as described above. If a public road is constructed from the Dalton Highway to the program area, it could create additional access for visiting hunters and recreationists, thereby increasing disturbance and mortality from hunting. The levels of legal hunting could be managed through hunting regulations and the BLM can work with the ADFG, the Alaska Board of Game, and the Federal Subsistence Board to adjust hunting regulations and lower the magnitude of these impacts.

The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate or degree of the potential cumulative impacts. If climate change results in greater frequency of rain-on-snow events or other adverse impacts, it could result in caribou entering the program area in poor condition. In such a case, cumulative impacts from the potential calving displacement and other impacts could be more pronounced (Murphy and Lawhead 2000). Changes in predator densities as a result of climate change or increases in alternative prey could affect caribou and changes in caribou abundance could impact numerous species. As a larger percentage of the program area is developed, there would be fewer options for caribou and other species to adapt to a changing climate by shifting their distribution. Changes in winter climate could result in changing caribou distribution and changes in the availability to and harvest effort from subsistence hunters (Gagnon et al. 2023).

Residents of Kaktovik have expressed concern that eco-tourists viewing the Porcupine Caribou Herd may deflect the leaders of the herd, altering movement routes (Native Village of Kaktovik, see **Appendix T**). Because the Porcupine Caribou Herd requires flexibility in annual calving areas, depending on spring conditions (USFWS 2015a; Russell and Gunn 2019; Severson et al. 2021), the cumulative impacts of the potential development projects would be larger under the alternatives with more potential for development in Porcupine Caribou Herd annual calving areas and with fewer alternative options for calving areas. Alternative B would contribute the greatest potential effects and Alternatives D and D2 would contribute the fewest, because it would restrict development to western and northern sections of the program area, largely outside of both the current Porcupine Caribou Herd calving areas and areas that are predicted to be used for calving in the future (Severson et al. 2021). The type and total amount of development in areas used during the post-calving period, on the Canning Delta, and along the Beaufort Sea coast would have cumulative impacts on Central Arctic Herd and Porcupine Caribou Herd movements after calving and during periods of mosquito harassment. The Central Arctic Herd has not used the program area to a large degree in recent years, although the Canning River delta continues to be used for mosquito-relief habitat. The Central Arctic Herd did use the program area extensively from about 2003–2014 and may use the program area more in the future.

Quantifying the impact of development on caribou populations is difficult because it requires specific assumptions of how development would affect caribou distribution or behavior and how those behavioral or distributional changes would, in turn, influence specific demographic rates such as survival or reproductive rates, which is largely unknown. There have been several recent efforts to quantify potential demographic impacts of development in the program area (Griffith et al. 2002; Russell and Gunn 2019; Russell et al. 2021). The impacts model described in Russell and Gunn (2019) was modified for different scenarios in Russell et

al. (2021). These estimated impacts are based on different assumptions and development scenarios but provide the best available quantification of the magnitude of potential demographic impacts on the Porcupine Caribou Herd that could occur as a result of development.

Griffith et al. (2002) and Russell and Gunn (2019) both estimated the potential declines in calf survival if calving were displaced from the Porcupine Caribou Herd primary calving habitat and shifted east into areas with poorer quality forage and higher levels of predation, as described above. If calving shifts west in the future, as predicted, the impact of displacement from infrastructure in the calving range could be even larger than those predictions.

Russell and Gunn (2019) and Russell et al. (2021) also used previously developed models of caribou movement, energy and protein intake, and demography to model the impact of potential development based on changes in caribou activity budgets in the program area at three levels of climate conditions—adverse, average, favorable—and starting population levels of 100,000 and 218,000 animals, using 414 collar-years of telemetry data locations (1985–2017). For these models, they assumed that caribou would not be displaced by infrastructure but instead would lessen the time they spend on foraging and its intensity. The caribou would increase the time spent walking and running when in the program area or within a ZOI of existing infrastructure (the size of the ZOIs was unspecified) in the Porcupine Caribou Herd annual range.

Under these models, changes in behavior would change body condition, leading in turn to differences in survival of calves and the probability of pregnancy for cows. In the models, the decline in time spent foraging was assumed to vary between 3 and 12 percentage points, and the decline in feeding intensity was assumed to be between 2 and 6 percentage points, depending on the season and lease stipulations in place (Russell and Gunn 2019; Russell et al. 2021).

Based on these assumptions, Russell and Gunn (2019) predicted a population decline over the baseline model of 6-17 percent after 10 years with a starting population of 218,000 animals and a decline of 9–18 percent after 10 years with a starting population of 100,000 animals depending on which of the four different alternatives in the Final Leasing EIS (BLM 2019a) was selected. For the alternatives in this SEIS, this corresponds to a predicted decline of 17 and 18 percent, for a starting population of 218,000 and 100,000, respectively under conditions similar to Alternative B and a predicted decline of 7 and 9 percent for a starting population of 218,000 and 100,000, respectively under conditions similar to Alternative C. There is no corresponding prediction for Alternative D or Alternative D2, but these alternatives have more protections for caribou than Alternative D2 in the Final Leasing EIS (BLM 2019a). As such, the predicted declines are likely to be lower than the predicted declines of 6 and 9 percent for a starting population of 218,000 and 100,000, respectively for Alternative D2 of the Final Leasing EIS. In general, Russell and Gunn (2019) concluded that development caused more rapid declines during decline phases in the herd and slower increases in the herd during the growth phases so that there was a risk of the population losing more animals in a decline phase than can be made up in a growth phase with development impacts.

Russell et al. (2021) used six different development scenarios ranging from no leasing to full leasing and predicted a herd size decline of 2 to 19 percent from the current herd size and a decline of 11 to 26 percent for a starting herd size of 100,000 for the different leasing scenarios compared to the no leasing scenario.

These models provide estimates of potential effects of development and their variability among alternatives with different starting population and climate conditions. As with all modeling, however, the results depend on the assumptions used in the models. In these models, the assumed changes in the time spent foraging and the foraging efficiency are important drivers of the results. Because caribou have a low energetic cost of

locomotion, changes in the time spent foraging would have a larger impact on demographic parameters than changes in movement rates (Fancy 1986; Fancy and White 1987).

The assumption that caribou would spend 3 to 12 percent less time foraging during the entire time they are in an area open to leasing, regardless of distance to infrastructure, is based on the expert opinion of the authors. Research on activity budgets of caribou near infrastructure gives varying results and differs in the distances used. Murphy and Curatolo (1987) observed Central Arctic Herd caribou within 0.6 miles of oil field roads and found that they spent more time running and walking and moved farther per day within 1,969 feet of roads; however, they did not feed less, compared with those at a control site.

Nevertheless, it is possible that the decline in resting observed within 1,969 feet of roads may have resulted in lower feeding rates later because caribou need periods of rest for proper rumination. Fancy (1983) found that estimates of the time spent feeding and lying were lower near a drill site, compared with a control site 2.49 miles from infrastructure; however, the difference was not statistically significant, and feeding was not analyzed separately from lying. Roby (1978) found that Central Arctic Herd caribou with calves spent more time feeding, standing, and walking and less time lying within 100 meters of the Dalton Highway than those over 300 meters away.

Johnson and Lawhead (1989) compared activity budgets of caribou within 1,640 feet and over 1,640 feet from Kuparuk oil field roads. When insects were absent, there was a marginally significant ($P = 0.07$) increase in feeding near roads, but when mosquito harassment was occurring, there was a significant decrease ($P \leq 0.05$) in time spent feeding near roads.

BHP (2004) and Golder (2011) did report a marginally significant ($P = 0.07$) decline of 5.4 percent in time groups with calves spent feeding within 3.1 miles of large open pit mines. This is compared with groups with calves over 3.1 miles away and a significant decline ($P = 0.01$) of 10.4 percent in time spent feeding/resting for caribou groups with calves within 3.1 miles of the mines. Smith et al. (2023) found a significant increase in foraging rate with distance to winter roads in Canada, but the largest declines in foraging rate all occurred close to the road.

Murphy et al. (2000) used a previous Porcupine Caribou Herd model to examine the impact of changing activity budgets of 600 meters or less from roads in the Kuparuk oil field, based on activity budgets of Central Arctic Herd caribou reported in Murphy and Curatolo (1987). Murphy et al. (2000) found that under realistic scenarios of exposure to development (25 percent or less time from June 10 to August 8), the population decline would be 1 percent or less, due to disturbance; however, they acknowledged that their results were preliminary. One primary difference between these results and those of Russell and Gunn (2019) was that Murphy et al. (2000) assumed no change in time spent feeding, as reported by Murphy and Curatolo (1987).

Russell and Gunn (2019) also point to studies showing more rapid movements for caribou crossing roads or moving into or out of ZOIs (size not specified). They estimated that an increase in distance traveled per day of 65 percent would equate to a 14-percentage point increase in time spent walking or running.⁹

This increase in walking or running might result in less time feeding (Russell and Gunn 2019), but this was not always true in other studies (Murphy and Curatolo 1987). Others have also found that caribou move faster when crossing a road (Leblond et al. 2013; Plante et al. 2018; Prichard et al. 2020a), but these effects are limited in extent and can be biased toward higher values (Prichard et al. 2020a). This is because caribou moving faster are more likely to cross a road or boundary. Studies of Central Arctic Herd movement rates within 6.2 miles of roads and pads in the Kuparuk oil field indicated only small increases in movement rates

⁹This calculation assumes that the increase in movement distance was not accomplished by moving faster.

during road crossings and when caribou were within approximately 2.49 miles of roads. The largest increases were during the post-calving and mosquito seasons, when results could be confounded by insect activity (Prichard et al. 2020a). None of these studies demonstrated changes in feeding behavior on the time or space scale assumed in the models by Russell and Gunn (2019) and Russell et al. (2021).

Due to the maximum limit of 2,000-acres of gravel infrastructure under all action alternatives, a maximum of approximately 803,000 acres are expected to be within 3.11 miles of roads, pads, or gravel mines as described above; therefore, approximately 51 percent of the program area could be more than 3.11 miles from roads, pads, or gravel mines.

Because Russell and Gunn (2019) did not specify a ZOI for changing activity budgets in the program area, the assumed decrease in feeding rates in their models extends far beyond 3.1-mile zone of lower foraging rates observed in Golder (2011). In addition, the amount of time caribou could be in the program area could be quite extensive, with about 5 percent of caribou using the area for more than 5 weeks (Russell and Gunn 2019). It is not known if time spent foraging would change over this extended period. In addition, as previously described, it is likely that most maternal caribou will react to infrastructure by moving away from infrastructure during the calving season, rather than remaining near infrastructure and changing their feeding behavior as assumed in the model. Russell et al. (2021) discussed the difficulty modeling a change in caribou distribution rather than a change in activity budgets, noting, “We also recognize that modeling caribou movement through the landscape is based on historical movements as reflected in satellite collar locations. Thus, the question we are answering is, “what are the potential impacts of new infrastructure if historic caribou movement patterns continued?” To explore consequences if movement patterns changed, we would need a movement model that can dynamically move animals through a developed landscape (see Panzacchi et al. 2016). To construct such a model, we need to understand the choices caribou make when they encounter development. We also need a finer scale understanding of the energy and protein balance from selecting different habitats especially under a warmer climate. (Russell et al. 2021)” While some models exist to predict the impact of caribou behavior on body condition and parturition and survival (e.g., Russell and Gunn 2019; Russell et al. 2021), there is still great uncertainty in values required as input. As described above, there is uncertainty in how caribou will react to infrastructure during different seasons (e.g., foraging rates, movement rates, displacement distance) and how forage quantity and quality vary spatially and temporally for caribou that are displaced or change their feeding behavior. These issues demonstrate the difficulty of modeling impacts from development on caribou demographics, especially before the development of specific project proposals. Nevertheless, in the absence of improved models of the demographic impacts of changes in caribou reaction to infrastructure (both changes in activity budgets and changes in distribution), the results of Griffith et al. (2002), Russell and Gunn (2019) and Russell et al. (2021) provide estimates of the potential magnitude of the impacts of different development scenarios.

These models and existing literature do indicate that the size and location of development and mitigation required will influence the potential for development to cause a decline in herd size. Overall, the major impacts to Porcupine Herd caribou that are most likely to have negative population-level impacts are displacement from roads and pads that could result in use of alternative areas that have lower quality, quantity, or accessibility of forage or higher predation rates. Roads and pipelines could result in delays or deflections of movements that result in higher energetic costs, block access to preferred areas, or increase exposure to insect harassment. All alternatives would be required to have mitigation measures shown to improve the ability of caribou to navigate through development or lower disturbance. These mitigations measures include elevated pipelines, pipeline road separation, vehicle use plans, and flight altitude requirements (ROP 23). Alternatives

D and D2 also require the use of an ARMP which would provide an opportunity for mitigation measures to be altered in response to new information or changing circumstances.

Therefore, alternatives with more roads and other development in seasonally important areas of the project area are likely to have larger negative impacts on caribou and other terrestrial mammals as described above. Although the entire program area may be used for calving and post-calving, the areas most likely to be seasonally important to caribou within the program area are regions that are frequently used for calving or post-calving movements or areas projected to be used for calving or post-calving movements in the future. In general, Alternative B is likely to have the most roads, pipelines, and pads and they are allowed to be placed in more seasonally important areas than the other action alternatives. Alternatives D and D2 are likely to have the lowest number of pads and miles of pipelines and among the lowest miles of roads. In addition, development is limited to areas that are less likely to be seasonally important. For these reasons, Alternative B is likely to have the largest impacts on caribou and Alternatives D and D2 are likely to have least significant impacts on caribou as described above.

3.3.5 Marine Mammals

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on marine mammals from on-the-ground activities and associated marine activities.

The Final EIS on Effects of Oil and Gas Activities in the Arctic (NMFS 2016a) provides detailed descriptions of potential impacts of petroleum-related industrial activities on marine mammal populations, including seismic exploration and drilling activities. That analysis is incorporated here by reference. The effects of climate change, described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under this alternative, current management actions would be maintained, and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). There would be no direct or indirect impacts on marine mammals under Alternative A from oil and gas leasing activities.

Impacts Common to All Action Alternatives

The following potential actions and environmental consequences would be common to all action alternatives, although the extent of activities allowed and the areas affected would differ somewhat under each alternative, as described later in this section. All of the action alternatives would affect large areas of the designated terrestrial denning unit of critical habitat for polar bears. This is because any activities conducted or facilities constructed within 20 miles of the coast would be located in that critical habitat unit. All action alternatives would also affect the marine environment along the shipping corridor, from Dutch Harbor to the program area, much of which is designated as critical habitat for bearded and ringed seals and would pose risks associated with vessel traffic: hazardous substance spills, noise, and ship strikes.

Habitat Loss and Alteration

POLAR BEAR

For polar bears, direct loss or alteration of maternal denning habitat would potentially result from such activities as seismic exploration, gravel mining, gravel and ice road and pad construction, changes in natural drainage patterns (impoundment), and off-pad snow disposal. The direct loss of polar bear habitat and indirect loss through altered use of habitat as a result of oil and gas activities would primarily involve the terrestrial denning unit of critical habitat (**Map 3-41** in **Appendix A**). This constitutes 76.3 percent (1,193,000 acres) of the program area (1,563,500 acres). At 4.7 percent (73,500 acres) and 0.1 percent (1,300 acres), respectively, the areas of the sea ice and barrier island critical habitat units potentially affected by program-related activities would be much smaller.

Even though the overall proportion of barrier island critical habitat in the program area is not large, that habitat receives a disproportionately high level of use by polar bears (Wilson et al. 2017); thus, program-related activities affecting that critical habitat unit could have a larger impact on polar bears than is indicated on the basis of proportional representation. Totaling all three units, 81.1 percent (1,267,800 acres) of the program area is designated critical habitat for polar bears.

It is important to note that not all portions of the terrestrial denning unit of critical habitat represent potential maternal denning habitat, however, because of local topography and the distribution of suitable bank-habitat characteristics across the landscape. Potential maternal denning habitat identified on an IfSAR digital terrain model (Durner and Atwood 2018) totaled 18,200 acres in the program area. This constitutes high-priority habitat that would need to be surveyed for dens before seismic surveys or other cross-country vehicle activities contemplated by ROP 10 (**Table 3-29**).

To date, the occurrence of maternal dens documented by Durner et al. (2010) has been disproportionately high in the high HCP zone, where 53 percent of known dens occurred in 23 percent of the maternal den habitat mapped (**Table 3-29**). In contrast, the occurrence of dens in the low HCP zone has been disproportionately low, with only 4 percent of known dens occurring in 25 percent of the mapped habitat. The occurrence of dens in the medium HCP zone has been proportional to the amount of mapped habitat.

Table 3-29
Number of Documented Dens and Extent of Potential Terrestrial Denning Habitat for Maternal Polar Bears within the Three Zones of Estimated HCP in the Program Area

Hydrocarbon Zone	Number of Dens	Estimated Area of Potential Maternal Denning Habitat (acres)
High	25 (53%)	4,100 (23%)
Medium	20 (43%)	7,900 (43%)
Low	2 (4%)	6,400 (35%)
Total	47	18,200

Notes:

Maternal dens documented by Durner et al. (2010); two more recent den locations were provided by Durner (pers. comm.).
Maternal denning habitat was mapped by USGS (Durner and Atwood 2018); see **Map 3-41** in **Appendix A**.

During the exploration phase of activities, temporary loss or alteration of polar bear denning habitat would result primarily from the tight 330-foot to 1,320-foot grid spacing used in 3D seismic exploration of the program area. It also would result from the construction of ice roads and pads for exploration drilling, which persist for one winter season. The direct effects of seismic vehicle passage and of building ice roads and pads in potential denning habitat would be temporary until the vehicle trails and ice structures thawed during spring

melt; however, annual reconstruction of ice structures in the same locations would result in perennial loss of use of the specific bank-habitat segments affected.

Because seismic exploration and the placement of ice structures would not affect the topographic characteristics that create the favorable denning conditions, no long-term direct effects on habitat suitability would be expected to occur. The effects of seismic exploration, construction of ice and gravel roads and pads, and construction of pipelines also would create the potential for short-term temporary loss of use of suitable denning habitat through behavioral disturbance, as described further in the next section below.

During the development and production phases of post-leasing activities, long-term (essentially permanent), direct loss of polar bear habitat would occur as a result of gravel mining and placement for roads and pads within the estimated footprint of surface development, as well as from construction of the barge landing and STP at the coastline. The magnitude of impact would be smaller than the widespread but short-term impacts of activities, such as 3D seismic exploration. This is because the habitat area affected directly would be substantially smaller than during exploration.

After production ceases and gravel infrastructure is abandoned, the presence of remnant gravel berms may provide some short-term bank habitat conducive to snow-drift formation, potentially providing small amounts of suitable denning habitat. Eventual removal and reclamation of human-made gravel berms would eliminate those artificial habitats.

Future water withdrawal from lakes for the construction of ice roads and pads would not be likely to cause adverse effects on denning habitat or its use by bears, provided that no occupied maternal dens occur within 1 mile of the withdrawal sites or ice roads used for access. Similarly, the presence of snow dumps and drifts in the vicinity of oil and gas facilities are likely to have negligible short-term effects on polar bear habitat since they are unlikely to be located on or near bank or bluff habitats.

Disturbance by activities at the barge landing and STP and on ice and gravel roads and pads would likely alter the use of habitats by bears nearby; however, those effects would diminish for facilities located farther inland because they would be less likely to be used by bears than other areas on and near the coastline. Overall, the effects of reduced use of habitats near oil and gas facilities likely would be minor and localized, although they would be long term.

In summary, the potential effects of habitat loss and altered use of denning habitat by polar bears are expected to be minor to moderate, depending on the program phase. After the placement of gravel pads and roads during the development phase, the attractiveness of potential maternal denning habitat in the vicinity of infrastructure would likely be diminished for some bears over the long term. This is because of the presence of the facilities and associated human activities. Sows may instead establish maternal dens in areas away from infrastructure and human activity.

SEALS

Following leasing, direct and indirect loss of habitat may occur for ringed and bearded seals during all phases of the RFD scenario (**Appendix C**). For ringed and bearded seals, potential alteration of local seafloor foraging habitat could result from modifying the seafloor profile caused by activities at a barge landing site. Barge landings are anticipated to occur annually, so this loss would occur throughout the 85-year analysis time frame, starting with the first permitted exploration and development project.

The size of the affected area would be similar among the action alternatives, regardless of which possible landing site is used (one on Camden Bay near the mouth of Marsh Creek and the other farther east, at Point

Thomson). The exact amount of habitat to be altered would depend on the local bathymetry and the placement of the barge landing site. Direct effects would be localized to screeded areas, and potential indirect effects would be anticipated in the sediment plume.

Ringed seals could overwinter and produce pups in the nearshore program area. Critical habitat for ringed seals constitutes 7.7 percent (1,200 acres) of the program area and it is all located over marine waters (**Map 3-43 in Appendix A**). Under all action alternatives, the integrity of ringed seal lairs would be threatened by collapse caused by tracked vehicles on sea ice during seismic activity or by the construction of winter roads on the ice. In addition to physically altering potential habitats, tracked vehicles and ice roads in the nearshore environment could disturb and displace individual seals (see *Disturbance and Displacement* section) and could injure or kill pups and females (see *Injury and Mortality*, below).

The occurrence and schedule of seismic activities or ice roads in the nearshore environment is unknown, but seismic exploration would occur in the early phases of any proposed project, while ice roads could occur during any phase of development. Starting with the first permitted development project, seismic and transportation impacts could occur semiannually to annually, depending on the overall pace of development. While potential effects of habitat loss on on-ice traffic could be long term and could extend across the nearshore environment of the program area, it is not likely that a large proportion of available habitat would be affected or that large numbers of seals would be displaced.

WHALES

No whale habitat is expected to be lost or altered under any of the action alternatives. Open-water habitats used for migration and feeding may, however, experience a change in the soundscape (see **Section 3.2.3**, Acoustic Environment) that equates to direct habitat loss (see BOEM 2018b). Vessel presence and noise have the potential to disturb and displace whales from transit routes. Belugas and baleen whales, including bowhead whales, can show strong avoidance of moving vessels. Vessel transits between Dutch Harbor and the program area could encounter several species of cetaceans, including those found in the Beaufort Sea and from the Bering and Chukchi Seas. Barge shipping is anticipated to occur annually, beginning with the first permitted project, although the number of vessels is anticipated to be low. The NMFS previously determined that the potential for adverse effects of vessel noise were unlikely for cetaceans in this transit route (NMFS 2016; see BOEM 2018b).

Disturbance and Displacement

All four action alternatives would result in a similar level of potential disturbance and displacement of marine mammals in the marine environment. Because vessel transit routes and the number of barge landing locations of hypothetical development scenarios do not differ among the action alternatives, neither would the potential effects of the activities associated with marine transport and STP development and operation (facility noise and transportation) on marine mammals. Polar bears and seals would experience direct behavioral effects and indirect habitat loss from disturbance caused by human activities and noise associated with ice road and barge transportation (vehicle passage and noise), activities at marine barge docks, human activities at camps and the STP, and oil spill response planning and drills. During the seasons of open-water barge transport, large vessel traffic transiting from Dutch Harbor to the program area would have the potential to disturb or displace whales, seals, and possibly polar bears by the temporary disturbance of water and by creating strong low-frequency underwater sounds (Richardson et al. 1995). Terrestrial activities and facilities are not expected to have an effect on the behavior of whales because they do not generally approach within 1 nautical mile of the coast.

POLAR BEAR

Noise and visual disturbance from human activity and operation of equipment, especially aircraft and vehicle traffic, have the potential to disturb polar bears nearby (Blix and Lentfer 1992; MacGillivray et al. 2003; Perham 2005; Schliebe et al. 2006; USFWS 2006, 2008b, 2009; Andersen and Aars 2008; Quigley 2022). During sample flights along the Beaufort Sea coast in late September 2021, bears that were active (for example, walking, standing, running, or feeding) and on the mainland were more likely to exhibit a behavioral response to an aircraft overflight than bears laying on barrier islands (Quigley 2022). ROP 34 requires minimum altitudes for aircraft used for permitted activities within 0.5 mile of observed bears on land or ice, mitigating the effect of aircraft disturbance on surface bears. The greatest concern is disturbance of maternal females during the winter denning period, which could result in premature den abandonment and loss of cubs (Amstrup 1993; Linnell et al. 2000; Lunn et al. 2004; Durner et al. 2006). Polar bear dens are known to occur onshore in the program area (**Map 3-41 in Appendix A**) and the incidence of terrestrial denning by the SBS population is increasing (Fischbach et al. 2007; Olson et al. 2017), so the potential for disturbance of maternal dens during the exploration, development, and production phases of oil and gas activities is of concern.

Tolerance to human disturbance varies among individual bears, and there is large variation in the distances and types of exposures that elicited reactions as well as the severity of those reactions (Amstrup 1993; MacGillivray et al. 2003; Woodruff et al. 2022a). Some female polar bears have denned successfully in the existing oil fields where industry activities occurred as near as 165 to 330 feet from occupied dens, whereas other females abandoned dens where activities occurred at distances of 330 to 1,640 feet (Amstrup 1993; Larson et al. 2020). A review of disturbance at 46 polar bear dens between 1972 and 2018 determined that 67 percent of dens had outcomes (i.e., early emergence, early departure) with potentially critical consequences, and 9 percent of dens resulted in possible cub mortality (Woodruff et al. 2022a). The sources of disturbance were from industrial and research activities that included aircraft and vehicle traffic and close approaches to dens. Amstrup (1993) found that several females responded to disturbance early in the denning period by moving to other sites, suggesting that females may be more likely to abandon dens in response to disturbance early in the denning period, rather than later. Hence, the initiation of intensive human activities during the period when females seek den sites (October to November) would give them the opportunity to choose sites in less-disturbed locations (Amstrup 1993), at least in areas where oil field activity occurs consistently throughout the year.

In undeveloped areas subject to seismic exploration or winter construction of exploration ice roads and pads dens are likely to have been established and occupied by the time enough snow has accumulated to allow those activities to proceed, raising the risk of den disturbance and abandonment. In January or early February 1985, a collared female polar bear prematurely abandoned her den near the mouth of the Canning River in the Arctic Refuge, possibly in response to the passage of seismic exploration vehicles within 660 to 2,640 feet of the den (Garner and Reynolds 1986: p. 518). Premature abandonment can adversely affect population productivity; survival is poor for cubs that leave dens early in response to the movement of sea ice (Amstrup and Gardner 1994). Females that remain in dens through the end of the denning period have much higher cub survival than do females that emerge from dens early (Rode et al. 2018).

Experimental studies of noise and vibration in artificial (human-made) “dens” have been used to estimate the distances at which disturbance may occur. Snow cover provides an effective buffer for industrial noise from vehicle passage and overflights of helicopters, reducing low-frequency noise by 15– 25 dB and high-frequency noise by as much as 40 dB for activities conducted near the artificial dens (MacGillivray et al. 2003; Owen et al. 2021). Despite the reduction in noise within closed dens, aircraft have a ≥ 75 percent probability of being detected by polar bears at distances ≤ 1.0 mile and ground-based sources have high probabilities of

detection at distances ≤ 0.5 miles (Owen et al. 2021). The most audible disturbance stimuli measured from inside the dens is an underground blast, detectable in artificial dens up to 0.8 miles from the source (MacGillivray et al. 2003). Most of the industrial sources exhibited the greatest noise levels at low frequencies, which are outside the range of polar bear hearing and not likely to cause biologically significant responses (MacGillivray et al. 2003; Owen et al. 2021). These studies provide a conservative estimate of the potential for detection rather than the potential for disturbance itself.

The use of airborne FLIR sensors has proven to be an effective means of locating dens over large areas, as has the use of handheld or drone-mounted FLIR sensors and specially trained dogs to confirm the presence of suspected dens¹⁰ (Amstrup et al. 2004b; York et al. 2004; Perham 2005; Shideler 2014; Pedersen et al. 2020).

These survey methods do not provide perfect detection, and variable percentages of occupied maternal dens have been missed in pre-activity surveys in other areas of the North Slope, west of the program area. Using airborne FLIR, the best available data indicate a range of detectability from 15 percent to 54 percent, depending on the experience of the crew,¹¹ the number of surveys flown, the weather conditions prevailing at the time of the surveys, and seasonal timing and snow depth (Robinson et al. 2014; Wilson and Durner 2020; Smith et al. 2020; Woodruff et al. 2022b). The best results are obtained by employing experienced crews to conduct multiple surveys during cold, clear, calm weather early in the denning season, when snow cover is shallower than later in the season (Amstrup et al. 2004b; Owyhee Air Research 2018; Pedersen 2019; Pedersen et al. 2020;). Increased air moisture in relation to climate change may make finding optimal operation windows for FLIR surveys increasingly difficult (Smith et al. 2020).

In practice, such conditions can be difficult to achieve and some occupied dens are likely to be missed even under suitable conditions. Those conducting airborne FLIR surveys for the USFWS during late February 2018 over part of the program area, plus other portions of the Coastal Plain in the Arctic Refuge east of the program area, encountered difficulty. This was due to poor weather conditions, and surveys could be conducted on only half of the field days; nevertheless, they detected nine FLIR “hotspots” (Owhyee Air Research 2018). Six of the hotspots were in the program area and two of those may have been fox dens, but no ground verification survey was conducted.

The FLIR operators concluded that conducting surveys earlier in the winter (December/early January) would be better because snow cover would be thinner at that time. By applying the detectability rates described above to the average of 14 maternal dens estimated to occur annually in the program area (see **Appendix K**), 6 to 11 occupied dens may go undetected during seismic exploration of the entire program area if additional den mitigations are not applied. Because dens are not distributed evenly across the landscape, however, the actual numbers affected would vary among the three zones of hydrocarbon potential: the combined high and medium HCP zones having the most denning habitat (75 percent) and numbers of documented dens (95 percent) (**Table 3-29**). Depending on the specific dimensions of the exploration grid, seismic vehicles would be likely to pass within 165 to 660 feet of at least one den in the program area, distances at which some maternal females have been known to abandon dens prematurely.

Per the requirements of ROP 10, operators would have to search for dens within and near areas of operation using FLIR sensors. This would be required in the program area annually before seismic exploration and

¹⁰It is not feasible logistically to use handheld or drone-mounted FLIR over large areas, but could be used in discrete project areas.

¹¹A rate of 22 percent was obtained by one crew due to complications with the helicopter, FLIR unit, and weather effects on the image.

construction of roads and pads begins. If dens are detected within a 1-mile buffer zone around the proposed locations of seismic exploration gridlines or ice roads and pads, then activities would be moved outside of that radius to avoid dens. If dens are detected within one mile of ongoing activities, operators must cease work and contact the BLM and FWS for guidance. The BLM and FWS would evaluate these instances on a case-by-case basis and BLM may impose emergency closures, traffic restrictions, additional monitoring, or other requirements. Such discoveries typically trigger emergency road restrictions and 24-hour monitoring until the bears depart the dens, as prescribed in typical polar bear interaction plans. If dens go undetected, however, then they are likely to be disturbed by seismic exploration. Such disturbance would be short term (during the denning period) but widespread, and if they cause the sow to prematurely abandon the den, there could be potentially grave consequences to her cubs (see *Injury and Mortality*, below).

Blasting at gravel mines and pile-driving of bridge abutments during future winter construction during the development phase would be sources of noise in polar bear denning habitat. Pile-driving would occur at bridge crossings over rivers and would produce strong in-air noise levels (Greene and Moore 1995; Blackwell et al. 2004). Along with gravel blasting, this would be one of the noisiest activities during construction. The level of received sound at any specific distance from pile-driving depends on the density or resistance of the substrate, bottom topography and composition, such as mud, sand, rock, the physical properties and dimensions of the pile being driven, and the type of pile-driver that is used (Richardson et al. 1995; Blackwell et al. 2004).

Winter blasting and pile-driving are likely to disturb some polar bears. Possible impacts on polar bears exposed to noise potentially include disruption of normal activities, displacement from foraging and denning habitats, and displacement of maternal females and young cubs from dens.

Displacement of non-denning bears from preferred coastal habitats would be another potential impact of disturbance by program-related activities in all program phases. In an experimental study on Svalbard, female bears with young cubs reacted to direct approaches by snowmachines nearly 1 mile away, on average (mean distance = 5,033 feet; 95 percent CI = 1,667–9,081 feet; Andersen and Aars 2008). Medium-sized single bears (subadults) also reacted at fairly long distances (mean distance = 3,806 feet; 95 percent CI = 1,230–4,439 feet) and adult males and females without cubs were the least reactive (mean distances = 1,070 and 538 feet, and 95 percent CI = 453–1,627 and 161–1,781 feet, respectively). Besides reacting at longer distances, maternal females and subadults showed stronger responses than did adults without cubs.

Polar bears passing near infrastructure in the program area would be exposed to a wide variety of potentially disturbing stimuli resulting from seismic exploration, drilling exploration and development, pipeline, road, and pad construction. Other stimuli are human activity on pads, vehicles on pads and interconnecting access roads, barge traffic in the lagoon system and associated offloading operations at marine docks, the STP, and spill-response drills (including equipment staging).

A variety of behavioral responses by polar bears is likely to occur, ranging from avoidance by maternal females with young cubs in spring to approach by curious bears attracted by sights, sounds, and odors. Standard industry practice is to allow polar bears moving through areas of infrastructure to cross roads and pads without disturbance, reserving deterrence by hazing for situations in which bears endanger workers or attempt to linger on active pads or roads. The USFWS (2006, 2008b, 2009; 86 FR 42982) has concluded that the types of activities typical of oil and gas exploration, development, and production projects in northern Alaska were not likely to have population-level effects on polar bear populations at the levels analyzed in developed areas west of the Arctic Refuge. This conclusion was based on the fact that the behavioral responses of individual bears were short-term and localized.

Disturbance and localized displacement could occur during seasonal movements by polar bears in the program area. The net direction of movement by maternal females leaving terrestrial denning areas with young cubs is northward, potentially requiring them to cross gravel roads and pipelines during the development and production phases; however, the likelihood of such encounters would be greater near the coast where most maternal dens tend to be concentrated.

The greatest likelihood for bears to encounter program-related infrastructure and activities is along the coast during the open-water season (mainly July–October), as bears move eastward along the coast and congregate near the Kaktovik whale-bone pile in advance of the formation of seasonal ice. Bears traveling along the coastline would be most likely to encounter facilities directly at the coast, such as the barge landing and STP. Early detection of bears by trained bear monitors and detection systems would allow industrial activities to be modified to minimize disturbance of bears moving through the vicinity. The completion of barging in summer would reduce the potential for those activities to disturb bears moving along the shoreline, although some encounters are likely to occur in July and early August. Barge traffic operating in open water may cause some short-term disturbance of bears swimming in the ocean, but the likelihood of such encounters is low.

Polar bears moving along the coast through established oil fields (Kuparuk, Greater Prudhoe Bay, and Point Thomson) routinely encounter human-made obstructions and are able to cross or move past them without difficulty, resulting in short-term disturbance at most (USFWS 2008, 2009; 86 FR 42982). Short-term behavioral responses are not likely to have population-level effects and thus are considered less problematic than are den disturbance and abandonment (USFWS 2008, 2009; 86 FR 42982).

Another source of potential disturbance of polar bears during all phases of exploration and potential development would be noise and light generated by industrial camps, such as seismic camps, and large facilities, such as CPFs and STPs. Noise from production facilities would be relatively constant, with wind direction affecting the perception of sounds by polar bears. Depending on the individual bear, however, such stimuli could also be attractants.

Although short term, disturbance of denning female polar bears in the program area by 3D seismic exploration has the potential to cause moderate to major impacts by disturbing bears in dens that are not detected during pre-activity surveys. Judging from experience farther west on the North Slope, the potential effects of short-term behavioral disturbance on polar bears during the development and production phases of the program are likely to be minor to moderate.

It may become difficult to maintain that magnitude in the future if full-scale industrial development proceeds in the program area, polar bears continue to increase their use of terrestrial habitats, and the SBS population continues to decline. The number of polar bears potentially affected by disturbance is likely to increase during the development and production phases as summer sea ice cover continues to diminish. Continuing declines in sea ice are expected to result in more polar bears onshore during the open-water period, traveling the coastline more in summer and fall, and denning onshore. Such increases are expected as a result of the current trends for increasing use of coastal habitats and terrestrial denning habitats (Fischbach et al. 2007; Schliebe et al. 2008; USFWS 2006, 2008b, 2009; Olson et al. 2017; Wilson et al. 2017; Rode et al. 2021).

Polar bears spending more time on land and fasting more as sea ice cover diminishes are likely to experience an increase in fasting and adverse effects on energy budgets as a result of reduced access to fat-rich prey (Molnár et al. 2010; Wilson et al. 2017; Pagano et al. 2018b; Whiteman 2018; Atwood et al. 2020). It is likely that maternal denning will continue to increase in terrestrial habitats in the future (Rode et al. 2021), although the presence of operating facilities would probably discourage female bears from denning in suitable habitat

nearby; instead, they would be more likely to seek suitable den sites in less-disturbed habitat away from facilities.

WHALES AND SEALS

Potential noise and disturbance from program-related facilities and activities are likely to affect ringed, spotted, and bearded seals annually while they are in the program area. This could be generated by vessel traffic and coastal facilities, such as the STP during the open-water season. Noise also could be generated by activities in the nearshore coastal or lagoon areas, such as seismic programs, during the ice-covered season; this could affect individual seals by exposing them to noise and lair disturbance. In-air noise would be relatively constant, with wind direction affecting the perception of sounds at haul-out locations and in lairs within a radius of 2.5–3.7 miles from facilities (Kelly et al. 1988). Additional noise could be generated by vessel traffic during barging operations in summer, ice roads in the nearshore environment and mobilization of modular units in winter, and oil spill drills year-round.

Ringed seals are known to depart subnivean (under snow) breathing holes and lairs in response to human noise, including seismic surveys (Kelly et al. 1986). Incidents observed among radio-tagged ringed seals indicated that they departed lairs in response to snow machines at distances of 0.3 to 1.7 miles, to one occurrence of disturbance by seismic vibroseis at 0.4 miles, and to human footfalls within 660 feet.

Behavioral reactions of individual seals varied substantially; some haul-outs remained in active use despite proximity to seismic survey lines, snow machine routes, and air traffic, while others were abandoned quickly in response to noise at greater distances. For example, seals did not leave haul-out sites in response to helicopter flights at 1,500 feet or higher, but helicopters at 1,000 feet caused just over 50 percent of seals to depart lairs. In an investigation of under snow structures, the rate of abandonment was found to more than double, with industrial noise associated with seismic surveys and island building (Kelly et al. 1988).

Although ringed seals exhibited strong but variable reactions to human noise, the displacement of seals from haul-outs within 660 feet of seismic lines was determined unlikely to increase mortality, given that individuals maintain as many as 4 or 5 lairs each, with little evidence that disturbance resulted in permanent abandonment.

On-ice seismic activity has been found to displace seals from breathing holes and lairs, but the effects were limited to local areas and judged to be of little significance to the population at large (Kelly 1988); however, it is possible that some seals could be displaced from all of their lairs in an area and permanent abandonment of birthing lairs would be harmful to nursing pups. It is clear that seals are aware of sound intrusions and that they react at variable distances by temporarily departing lairs; however, individual variations in reactions make it difficult to define critical distances for noise disturbance (Kelly 1988).

Although marine mammals show overt reactions to noise from industrial activities, individuals or groups may become habituated if the noise does not result in physical injury, discomfort, or social stress (NRC 2003). Based on habituation reported for ringed seals at the Northstar Island facility (Blackwell et al. 2004), it is likely that at least some ringed seals may habituate to the noise and continue to use haul-outs and lairs for pupping near an STP location, but that cannot be predicted with confidence.

For all action alternatives, ROP 10 would minimize disturbance of seals in lairs by establishing a through-ice sound transmission buffer distance from any open water or ungrounded ice in less than 10 feet of water depth before any seismic surveys. ROP 10 also would limit airborne sound levels of equipment to 120 dB and would ensure that noise lessens to below 100 dB in the vicinity of basking seals.

The occurrence and schedule of ice-supported seismic exploration and on-ice vehicle traffic are unknown; however, seals could be disturbed by such activities annually or semiannually, starting with the first permitted exploration and development project and then throughout the 85-year time frame for this analysis. Routes also are unknown, but the extent of such disturbance could be large, including most of the nearshore environment. The primary impact on ringed seals would be temporary displacement and behavioral reactions.

During the summer open-water season, the presence and movement of ships may cause some ringed and bearded seals to abandon preferred feeding and resting habitat in areas of high traffic. Interactions with whales and seals would be reduced somewhat by the seasonal timing of barge transport in mid to late summer. This is a time when ringed and bearded seals also tend to occur farther offshore and when most bowhead and beluga whales are foraging farther east or northeast of the analysis area.

Future vessel traffic is not expected to significantly disrupt normal pinniped behavioral patterns (breeding, feeding, sheltering, resting, and migrating). This is because most pinniped/vessel interactions documented during arctic oil and gas exploration show little to no observable behavioral reactions (NMFS 2018). Pinnipeds typically show limited responses to vessel noise, such as increased alertness, diving, moving from the vessel's path by up to several hundred feet, or by ignoring the vessel. If hauled out, seals typically enter the water when vessels approach.

Seals are quick and agile in the water, making them unlikely to be injured by large, slow-moving vessels. Previous analyses have concluded that there is no indication that vessel strikes are an important source of mortality for seals (NMFS 2013, 2016). Exposure to vessels during the open-water period may affect individual seals and whales, but evidence of habituation to activity and evasion of vessels indicates that activities associated with marine transport to the program area are not likely to affect the reproductive success or survival of seals and whales.

ROP 46 would minimize disturbance of seals by vessel traffic by establishing rules of operation, including dedicated PSOs and setting rules of operation in the vicinity of seal, walrus, and sea lion haul-outs. The vessel noise and presence would be temporary and limited to affecting a few individuals by eliciting small, behavioral responses. Impacts at the population level for all pinnipeds are not expected.

Whales often show tolerance to vessel activity, but they may react at long distances if they are confined by ice or shallow water or were previously harassed by vessel operators (Richardson et al. 1995). Bowhead whales may allow seismic surveys as close as 3 km likely increasing their risk of a ship strike, while belugas are more sensitive and may show a behavioral response to ship noise as far away as 32 km (Halliday et al. 2020; Martin et al. 2023a, 2023b). Whale reactions to vessels may include behavioral responses, such as altered headings or avoidance (Blane and Jaakson 1994; Erbe and Farmer 2000), fast swimming, changes in vocalizations (Lesage et al. 1999; Scheifele et al. 2005), and changes in dive, surfacing, and respiration patterns. Beluga whale reactions to vessels depend on whale activities and experience, habitat, boat type, and boat behavior (Richardson et al. 1995).

Baleen whales, considered a low-frequency hearing group, have a hearing range of 7–35 kilohertz (kHz) (NMFS 2016b). Toothed whales are a mid-frequency group with a hearing range of 150–160 kHz. The primary underwater noise associated with vessel operations is the continuous cavitation noise produced by the propellers on the oceanic tugboats, especially when pushing or towing a loaded barge (NMFS 2018). Oceanic tugboats have a source level of approximately 170 dB at 3.3 feet that is anticipated to decline to 120 dB re 1 μ Pa rms within 1.15 mile of the source (Richardson et al. 1995). Generally, vessels do not produce sound source levels capable of injuring whales (Richardson et al. 1995; NMFS 2016a).

Future vessel traffic associated with the program area activities would result in whales temporarily avoiding vessels and changing vocalizations, diving, swimming, and respiration patterns. None of these potential effects would be chronic or sufficient to produce meaningful energetic losses to individual whales or to their populations. ROP 46 would minimize whale disturbance by vessel traffic by establishing rules of operation, including dedicated PSOs and setting rules of operation in the vicinity of whales. With this mitigation, whales would be expected to have temporary behavioral responses.

Injury and Mortality

Small numbers of accidental injury or mortality of marine mammals may occur under all action alternatives. Polar bear cubs would be susceptible to injury or mortality from 3D seismic exploration activities if the dens are not detected in pre-activity surveys, and polar bears crossing roads could be susceptible to vehicle strikes. Marine mammals could be susceptible to vessel/equipment strikes during barging and in-water work. Additional injury or mortality of marine mammals may occur due to accidental spills or contamination. For polar bears, program-related actions are most likely to result in injury or mortality due to human/bear interactions.

The BLM qualitatively evaluated the potential injury or mortality of marine mammals due to vessel collisions during the open-water season. The assessment was based on documented species behavior, sensitivity to the activity, mobility, and distribution relative to the frequency and seasonality of vehicle and vessel traffic.

POLAR BEAR

When the polar bear was listed as a threatened species in 2008 (73 FR 28212), the USFWS noted that the factors contributing to the primary threat identified in the listing analysis—rapidly diminishing sea ice habitat—cannot realistically be regulated under their management purview; therefore, in lieu of influencing the causes underlying climate change, such as GHG emissions, the USFWS has focused on factors more amenable to regulation, such as habitat protection and the prevention and reduction of lethal take (USFWS 2016). The result of this approach is that even greater emphasis has been devoted to mitigation through interaction planning to avoid and minimize injury and mortality of polar bears (USFWS 2016). Under all action alternatives, future oil and gas activities would increase the level of human/bear interactions, creating the possibility for increased injuries or deaths of both bears and, to a much lesser extent, humans. As sea ice cover continues to diminish, the number of encounters between nutritionally stressed bears and humans is expected to increase (DeBruyn et al. 2010; Rode et al. 2021). This would raise the likelihood of potentially dangerous encounters, as nutritionally stressed bears are more likely to attack humans (Wilder et al. 2017).

Sightings of polar bears at industrial sites in the Beaufort Sea region of Alaska have increased in recent years, consistent with increasing use of coastal habitats as summer sea ice cover has diminished (Schliebe et al. 2008; USFWS 2008; 76 FR 47010; 86 FR 42982; Pagano et al. 2020); however, the incidence of human/bear encounters and harassment by deterrence (hazing) remains relatively low. From 2010 through 2016, the industry reported under ITR LOAs that 395 of 2,373 polar bears (16.6 percent) observed near industrial sites in the North Slope oil fields were disturbed either unintentionally (incidental take) or by intentional deterrence (Miller et al. 2018). The percentage of reported take by intentional deterrence decreased over time, from a high of 39 percent of the bears observed in 2005 to 14 percent from 2010 to 2014 (81 FR 52276). The USFWS attributes the decrease in deterrence events to increased polar bear safety and awareness training of industry personnel, as well as ongoing deterrence education, training, and monitoring programs (76 FR 47010; 86 FR 42982).

Despite increased interactions in the existing oil fields in recent years, lethal take associated with oil and gas activities is rare. Three polar bears have been killed at oil and gas industrial sites in Alaska since the late 1960s: one in winter 1969, another in 1990 at the Stinson exploration site in western Camden Bay, north of the program area (Perham 2005; USFWS 2006), and one bear (killed accidentally during a hazing event in 2011) since the Chukchi Sea and Beaufort Sea ITRs went into effect in 1991 and 1993, respectively (USFWS 2008, 2009; 81 FR 52276).

Several other mortalities have been associated with military and industrial activity in northern Alaska. A polar bear was killed at the Oliktok Point Long-Range Radar Site in 1993 (USFWS 2010) after attacking a worker who provoked it. In 1988, a polar bear died on Leavitt Island, 5 miles northwest of Oliktok Point, after ingesting a mixture that included ethylene glycol and Rhodamine B dye (Amstrup et al. 1989). In 2012, two polar bears that had been exposed to Rhodamine B (and possibly other chemicals) were found dead on Narwhal Island, northwest of the Endicott offshore islands; although the deaths were human caused, the source of the chemicals could not be identified (FR 81 52276). In contrast, 33 polar bears were killed at industrial sites in the Northwest Territories from 1976 to 1986 (Stenhouse et al. 1988). Dyck (2006) reported that 618 polar bears (averaging 20 per year) were killed from 1970 to 2000 in the Northwest Territories and Nunavut in northern Canada, 25 (4 percent) of which occurred at industrial sites.

In addition to direct interaction with humans after being attracted to areas of human activity, a second potential source of injury and mortality is premature den abandonment. This is a possible outcome of den disturbance and has been documented to have adverse effects on cub survival (Amstrup and Gardner 1994; USFWS 2008, 2009; 76 FR 47010; 81 FR 52276). Among program phases, this potential impact is of greatest concern with regard to 3D seismic exploration, which would occur across much or all of the program area. Although the activity would be short term, the impact would be widespread and the magnitude would vary among the action alternatives. It poses the greatest potential risk of program-related demographic impacts on the SBS stock of polar bears.

In view of the tightly spaced grid covered by vehicles during commonly established techniques for 3D seismic exploration, most undetected dens within a mile of seismic operations would likely be disturbed if additional den mitigations are not applied. This would have moderate to major direct impacts on the SBS population of bears if they abandon those dens prematurely (i.e., before 15 March) and the cubs die. Existing rates of human-caused removals already exceed the SBS stock's calculated potential biological removal (PBR) level due to ongoing subsistence harvest levels. Thus, any additional mortality of SBS polar bears could further inhibit SBS polar bears from reaching their optimum sustainable population level.

Dens are not distributed evenly across the landscape, however, so the number of dens likely to be disturbed would be higher when seismic surveys are conducted in the high and medium HCP zones; in these zones, there is 75 percent more potential habitat, and 95 percent more dens have been found in the past, than in the low HCP zone (see **Table 3-29**). While it is unlikely and has yet to occur, it is also possible that one or more undetected dens could be run over by seismic vehicles, resulting in injury or death if the bears do not abandon the dens first. Seismic surveys generally avoid the steep bluff terrain where dens are most likely to occur.

A third potential source of injury or mortality is vehicle traffic on ice and gravel roads that intersect the movement paths taken by females with young moving from terrestrial denning habitat to hunting areas offshore in late winter (March–April), which poses a risk of vehicle strikes and disturbance-related distributional shifts. Vehicles tend to move slowly in the oil fields and have unobstructed views. No vehicle strikes of polar bears along ice roads in the North Slope oil fields have been reported in agency documents evaluating impacts on polar bears, indicating the risk is very low and the impact is negligible thus far. Because

of increasing use of terrestrial habitats by the SBS stock and the greater use of the program area by polar bears than of the oil fields farther west, the risk could increase if development proceeds in the program area. This would have long-term impacts of minor magnitude.

A fourth potential source of injury or mortality is accidental spills, leaks, and other sources of contamination. Polar bears are susceptible to thermal stress if their fur is fouled by direct contact with spilled petroleum products, which reduces body temperature and increases metabolic rate; oil is absorbed through skin contact, through the gastrointestinal tract, and by inhalation (Engelhardt 1983; Derocher and Stirling 1991). Contact and ingestion can lead to severe blood and kidney problems. The direct and indirect effects of spills depend primarily on the seasonal timing and location of the spills and on the volume of material released into the environment. A nearshore oil spill along the coastline of the program area in autumn could expose an average of 51 bears to lethal concentrations of oil if not actively managed (Wilson et al. 2024). Because of their more limited spatial extent, slower rates of dispersion, and higher likelihood of successful containment, terrestrial spills would have substantially less impact on polar bears than would spills in the marine environment during the open-water period in summer and autumn.

The only substantial potential program-related activity occurring in the marine environment would be annual barging of modules in several years during the open-water period, which would pose a low risk of spilled fuel if a vessel were to run aground. In general, because the spill volume and the area affected would be smaller, the number of bears potentially affected by such an accident also would be smaller than the potentially large number that could be affected by modeled, hypothetical, large marine spills from offshore production facilities (Amstrup et al. 2006b; Wilson et al. 2018; BOEM 2020) or subsea pipelines (Wilson et al. 2024). To date, large oil spills in the marine environment from industry activities in the Beaufort Sea and coastal regions that would affect polar bears have not occurred, although the interest in, and the development of, offshore hydrocarbon reservoirs has increased the potential for such spills (86 FR 42982).

Although the likelihood of a program-related spill in the marine environment is low, the greatest susceptibility and risk to polar bears would occur in autumn when polar bears congregate at the Kaktovik whale-bone pile.

Spills associated with development projects on the mainland would affect fewer polar bears than marine spills. Although the risk of a large spill during the development and production phases of the proposed program is low, several large terrestrial oil spills have occurred in the Prudhoe Bay area, albeit without any known impacts on polar bears (81 FR 52276). The volume of material released and the area affected would likely be small due to the volumes of material being used and the terrestrial base of activities.

Contaminant exposure is considered to be one of the largest threats to polar bears after the loss of their Arctic sea ice habitat due to climate change (Routti et al. 2019) and even small releases of contaminants can have effects on individual bears. As described above, three polar bears have died near industrial sites from chemical ingestion as a result of human activity (Amstrup et al. 1989; 86 FR 42982). Effective control of potentially toxic substances and careful attention to preventing spills of any size are the key to preventing such injuries. Overall, potential impacts on polar bears and their habitat in the program area from oil spills, leaks, and contaminant releases would be lessened through the safeguards specified in required spill prevention and contingency plans, the relatively small amounts of material likely to be released under most scenarios, and the responsible parties' ability to detect and clean up spills quickly on land, where most program-related activities would occur.

Any injury or mortality from oil and gas development-related human/bear conflicts could pose a problem because of the declining status of the SBS population. The attraction of polar bears to facilities and the

attendant problems from such attraction may increase through the operational life of the proposed program, as more bears use onshore areas during the open-water season due to declining sea ice, leading to increased use of coastal travel routes past oil and gas facilities. Conditions of the SBS stock of polar bears could significantly change between the publication of the Final SEIS and when activities occur on the ground. These changes could lead to higher levels of take, including injury or mortality of denning polar bears, than are currently anticipated. For example, recent research has shown that polar bears are expected to experience longer periods of time on land (Rode et al. 2022) due to sea ice loss. These changes could also lead to an increased proportion of the population being on land in autumn (Rode et al. 2022) or using land for maternal denning (Olson et al. 2017). Further, polar bears in the SBS stock have exhibited declines in size and productivity associated with sea ice loss (Rode et al. 2014) which could further exacerbate disturbance-related effects in the future.

In summary, although the potential for injury or mortality could be high when developing new oil and gas projects in polar bear habitat, the risks are generally well understood. Effective mitigation is available, based on experience from the ITR/LOA process in the established North Slope oil fields west of the program area; however, that area has less denning habitat and fewer denning polar bears than in the program area. The greatest risk of injury and mortality from disturbance and premature den abandonment would occur during the short-term but intensive 3D seismic exploration phase, which has not been conducted previously in an area with comparable densities of denning habitat and numbers of denning female bears.

The combination of seismic exploration with a relatively large number of polar bear dens underscores the protective benefits of ROP 10 and the crucial importance of refining mitigation techniques going forward. Over time, advancements in den detection technology and methodologies may increase den detection rates and thereby reduce impacts associated with 3D seismic surveys and other oil and gas operations. In contrast with the exploration phase, the net effects of program-related activities during the development, production, abandonment, and rehabilitation phases are likely to be minor to moderate in terms of injury and mortality at the population level. Given the current and predicted continuing decline of the SBS stock of polar bears, maximum emphasis during all program phases should be placed on avoiding injury or mortality, applying current mitigation measures that have been effective at reducing such risks, and applying new mitigation measures as they become available.

WHALES AND SEALS

In summer, vessel collisions could injure or kill whales or seals. The number and speed of ships is related directly to the severity of collisions between vessels and whales (Jensen and Silber 2004). In contrast, seals are less likely than whales to be struck due to their smaller size and higher maneuverability. BOEM estimated that 67 vessels per year associated with oil and gas leasing and exploration could transit the Beaufort Sea (NMFS 2013). Collisions with whales are rare for slow-moving vessels traveling at less than 10 knots (Laist et al. 2001; Vanderlaan et al. 2008). Barge convoys would move slowly, but the vessel operators would be unable to change direction or speed quickly (ROP 46). The low incidence of propeller scars found on bowhead whales landed by Alaska Native whalers indicates that vessel strikes of bowhead whales are rare (Laist et al. 2001; George et al. 2017). Although it is possible that a marine mammal could be struck by a vessel engaged in the barging operation, such incidents are highly unlikely, due to the slow vessel speed and low frequency of barge deliveries (assumed to be two landings per year). There is no indication that vessel strikes would be a major source of mortality for whales during marine transport to the program area (NMFS 2013).

Data recorded by PSOs aboard sound-source and monitoring vessels indicate that ringed and bearded seals in the Beaufort Sea avoid oncoming vessels (NMFS 2016a), and there is no indication that vessel strikes would become an important source of injury or mortality (NMFS 2013).

The absence of collisions involving industry vessels and marine mammals in the Bering, Chukchi, and Beaufort Seas, despite decades of spatial and temporal overlap, suggests that collision probabilities are low along the transit route from Dutch Harbor to the program area (NMFS 2013). More specifically, it is unlikely that vessels would strike subarctic whales because of the following:

- Few blue and sperm whales could be encountered, as they are rare and are found in deeper waters than those in which the transit route would occur
- Approximately 30 North Pacific right whales are known to exist
- Few western North Pacific gray whales have been documented outside their feeding areas in waters around Sakhalin Island, Russia
- Vessel mitigation measures, such as reducing speed, are typically required by NMFS and reduce the likelihood of vessel strikes

Thus, potential ship strikes of marine mammals would be highly unlikely and are not expected to occur.

Any vessels operating in or along transportation corridors to the program area would follow specified procedures for changing vessel speed and direction to avoid collisions with marine mammals. TLs on barging activity would avoid adverse effects on newborn ringed seals, particularly when nursing and molting (NMFS 2016a), because program-related vessel traffic would occur late in the open-water season when pups would be larger.

Under all action alternatives, ROP 46 would minimize impacts of vessel traffic strikes on marine mammals by establishing rules of operation. Besides adhering to other rules of operation in the vicinity of whales or seals, examples of these rules are using dedicated PSOs, prohibiting transit of vessels before July 1, and limiting vessel speed to 10 knots. Because of the slow vessel speeds and the presence of PSOs onboard operating vessels, vessel strikes are highly unlikely under any of the action alternatives.

Another potential source of injury or death is accidental spills, leaks, and other sources of contamination. Exploration and development would likely occur on land, with oil being transported in terrestrial pipelines to the TAPS. The potential effects of accidental releases of hazardous materials, including oil spills, which reach the distributary channels of rivers and streams and adjacent marine waters would be minor to negligible. This would be due to the safeguards in place to avoid and minimize oil spills, provided that containment is successful.

In the unlikely event of a large oil spill reaching open water during summer or fall, small numbers of bearded, ringed, and spotted seals and beluga whales could be adversely affected. The probability, volume, and potential spread of different types of spills are discussed in **Section 3.2.11**. Assuming that no large oil spills reach open water, potential impacts of terrestrial oil spills on marine mammals are expected to be minor to negligible.

Small, accidental fuel spills could occur with refueling at sea. This potential impact would be common to all marine mammals. In previous analyses, the BOEM assumed a vessel transfer spill during offshore refueling to have an estimated volume range from less than 1 to 13 barrels. The 13-barrel maximum spill volume represents a spill where spill prevention measures fail, fuel lines rupture, and no oil remains on the vessel. A

spill of less than 1 barrel could persist for up to 30 hours in open water, while a 13-barrel spill could persist for up to 2 days (BOEM 2015).

Attraction to Human Activity and Facilities

Other than polar bears, marine mammals are not likely to be attracted to program-related activities or facilities. Polar bears are curious and opportunistic hunters, frequently approaching and investigating locations where human activity occurs (Stirling 1988; Truett 1993). Proximity to humans poses risks of injury and mortality for both bears and humans and may necessitate nonlethal take through deterrence and hazing or, on rare occasions, lethal take to defend human life (Stenhouse et al. 1988; Truett 1993; Perham 2005; Wilder et al. 2017).

Stirling (1988) reported that curious polar bears commonly approach offshore drilling rigs in the Canadian Beaufort Sea whenever sea ice moved into the area but did not remain nearby for long, unless seals were present in the leads created by the rigs. Similar behavior has been observed at Northstar Island, north of Prudhoe Bay. Sightings of polar bears at industrial sites in the Beaufort Sea region of Alaska have increased in recent years, consistent with increasing use of coastal habitats, as summer sea ice cover has diminished (Schliebe et al. 2008; USFWS 2008; 86 FR 42982), and this trend is likely to continue.

Encounters between polar bears and humans in the program area are most likely to occur on and near the coastline, as bears move through in late summer and fall (August–October) and as maternal females search for den locations in autumn and early winter (October–November) and depart from dens with dependent cubs in late winter (March–April); however, the latter animals are the least likely to be attracted to industrial facilities, due to their greater sensitivity to disturbance.

The current ITR/LOA process to the west of the program area has proven to be effective at addressing and mitigating the risks of polar bear encounters with humans. Besides denning surveys, the polar bear interaction plans stipulate that bear sightings and encounters be monitored and reported by trained observers, as well as training personnel in nonlethal means of protection, if required, such as deterrence and hazing.

Although camps and other areas of human activity have the potential to attract polar bears over the entire life of the oil and gas program, experience in the established North Slope oil fields farther west demonstrates that these risks can be mitigated effectively by following polar bear interaction plans. Examples of preventive and mitigative measures are as follows (Truett 1993; Perham 2005; USFWS 2006, 2008b, 2009):

- Detection systems using bear monitors, motion or infrared sensors, and adequate lighting
- Safety gates, fences, and cages for workers skirting elevated buildings
- Careful waste handling and snow management
- Chain-of-command procedures to coordinate responses to sightings
- Employee education and training programs

All program-related activities must be conducted to minimize the attractiveness of work and facility sites to polar bears and to prevent their access to food, garbage, rotting waste, and other potentially edible or harmful materials, as required by ROPs 1, 2, and 4. Trained bear monitors on-site during all on-the-ground program activities would immediately report all polar bear sightings to safety personnel. Observing these requirements would reduce impacts on polar bears to negligible levels.

Alternative B

The types of future program-related activities and facilities would be similar among the action alternatives, but the location and extent of infrastructure and associated activity would differ among alternatives, in accordance with lease stipulations and ROPs, as described in **Appendix C**. Alternative B allows 3D seismic exploration across the entire program area, regardless of leasing and NSO restrictions. Operators would likely conduct smaller-scale 3D surveys on their own lease blocks, assuming that seismic information would not already be available.

Differences that would alter effects on marine mammals among alternatives primarily are those affecting the acreage of potential denning habitat for maternal polar bears, as well as the extent to which activities and facilities would be permitted in coastal and nearshore marine habitats used as travel routes by polar bears and for birthing lairs by ringed seals.

The potential impacts among action alternatives cannot be quantified accurately without knowing the future locations of program-related activities and facilities, so this evaluation assesses impacts by comparing the number of historical dens, amount of potential maternal denning habitat mapped, and likelihood of use by polar bears of the areas subject to various lease types and stipulations. The provisions of ROPs 1, 2, 4, 11, 15, 34, and 40 all would confer protection and mitigation measures on polar bears.

Because the entire program area is available to lease for oil and gas activity, Alternative B presents the greatest difference from Alternative A by enabling program activities and facilities in nearly all potential terrestrial maternal denning habitat for polar bears in the program area. Despite the lack of specific protection of denning habitat under this alternative, however, Lease Stipulation 1 would protect some maternal denning habitat by prohibiting permanent facilities within 0.5 to 1 mile of the 10 rivers and streams listed under that stipulation. Based on simulations of likely denning locations (USFWS 2021c), the NSO area under Lease Stipulation 1 includes an area that is expected to have 4.6 dens/year with a 95 percent confidence interval of 0 to 10 dens/year (**Table 3-30**) and 36 percent of the potential maternal denning habitat mapped in the program area (**Table 3-31**).

Under Alternative B, 70 percent of the maternal denning habitat for polar bears within the program area is protected from development-related impacts by prohibiting permanent facilities or through timing limitations (**Table 3-31**).

Except for those river buffers, all program activities and facilities would be allowed throughout the areas of greatest proportional occurrence of dens (high and medium HCP zones). Under Alternative B, Lease Stipulations 2, 3, 4, and 5 contain no specific requirements relevant to polar bears or their habitat (other than compliance with the ESA and MMPA, as well as coordinating with local subsistence users). This would result in greater potential long-term disturbance effects than under Alternative A. Alternative B has the greatest potential area affected by development and production among the action alternatives because of the large area that would be open to seismic exploration and development.

The impact and conflict avoidance and monitoring plan required under Lease Stipulation 9 for this alternative would provide some specific information for planning purposes but would not specifically restrict activities that could disturb polar bears using coastal habitats. It would reduce disturbance of bears moving along and denning near the sea coast, including the barrier islands unit of designated critical habitat and its associated 1-mile no-disturbance zone.

Table 3-30
Mean Estimated Number and 95% Confidence Interval of Expected Number of Polar Bear Dens by Alternative, Hydrocarbon Potential, and Lease Type

Lease Type*	Alternative B				Alternative C				Alternative D				Alternative D2			
	High	Med.	Low	Total	High	Med.	Low	Total	High	Med.	Low	Total	High	Med.	Low	Total
Not offered for lease sale	-	-	-	-	0.1	0.5	0.4	1	0.3	2.04	1	3.3	0.80	5.40	0.90	7.20
	-	-	-	-	(0-1)	(0-2)	(0-2)	(0-3)	(0-2)	(0-6)	(0-3)	(0-8)	(0-3)	(1-12)	(0-3)	(2-16)
Subject to NSO	3.3	1.1	0.2	4.6	5.2	3.7	0.4	9.3	6.2	3.3	0	9.6	4.30	-	-	4.30
	(0-8)	(0-4)	(0-1)	(1-10)	(1-11)	(0-9)	(0-2)	(3-19)	(1-13)	(0-8)	(0-0)	(3-19)	(0-10)	-	-	(0-10)
Subject to TL		1.4	0.4	1.8		0	0	0		0		0	0.10	-	-	0.10
		(0-4)	(0-2)	(0-5)		(0-0)	(0-0)	(0-0)		(0-0)		(0-0)	(0-1)	-	-	(0-1)
Subject to CSU	-	-	-	-	0.3	0.9	0.1	1.3	0	0		0	0.80	-	-	0.80
					(0-2)	(0-3)	(0-1)	(0-4)	(0-0)	(0-0)		(0-0)	(0-3)	-	-	(0-3)
Subject to only standard terms and conditions	3.3	2.9	0.3	6.6	1	0.4	0	1.4	0.1	0	0	0.1	0.60	-	-	0.60
	(0-8)	(0-7)	(0-2)	(1-14)	(0-4)	(0-2)	(0-0)	(0-4)	(0-1)	(0-1)	(0-0)	(0-1)	(0-3)	-	-	(0-3)

Source: USFWS data; Based on 10,000 iterations of simulated polar bear dens using the den distribution model from USFWS 2021c.

* The lease type "subject to TLs" was omitted from this table because those TLs pertain to caribou during summer.

- = not applicable

Table 3-31
Estimated Acreage and Percentage of Potential Maternal Denning Habitat
by Alternative, Hydrocarbon Potential, and Lease Type

Lease Type*	Alternative B				Alternative C				Alternative D				Alternative D2			
	High	Med.	Low	Total	High	Med.	Low	Total	High	Med.	Low	Total	High	Med.	Low	Total
Not offered for lease sale	-	-	-	-	100	1,200	5,000	6,200	100	2,700	6,400	9,200	400	7,800	6,400	14,600
	-	-	-	-	2%	15%	78%	34%	3%	35%	100%	51%	10%	100%	100%	80%
Subject to NSO	2,000	2,800	1,800	6,600	3,200	5,600	1,300	10,100	3,900	5,000	-	8,900	2,500	-	-	2,500
	49%	35%	28%	36%	78%	71%	20%	55%	98%	65%	-	49%	61%	-	-	14%
Subject to CSU/TL	-	2,100	4,200	6,200	200	700	100	900	-	-	-	-	800	-	-	-
	-	27%	66%	34%	5%	9%	2%	5%	-	-	-	-	20%	-	-	-
Subject to only standard terms and conditions	2,100	3,000	400	5,400	600	400	-	1,000	-	-	-	-	400	-	-	-
	51%	38%	6%	30%	15%	5%	-	5%	-	-	-	-	10%	-	-	-
Total	4,100	7,900	6,400	18,200	4,100	7,900	6,400	18,200	4,000	7,700	6,400	18,200	4,100	7,800	6,400	18,200

Source: BLM and USFWS GIS 2022; bank-habitat segments were mapped by USGS (Durner et al. 2006); see **Map 3-41** in **Appendix A**.
Acreage estimates assume an average width of 21 feet per mapped segment of bank habitat (Durner et al. 2001).
- = not applicable

Certain mitigation, monitoring, and reporting requirements of the current Beaufort Sea ITRs (86 FR 42982 18.126–128) have been incorporated into the ROPs. Adhering to ROPs 1 and 2 would reduce the potential for polar bears to be attracted to improperly handled garbage and other rotting waste. This would greatly diminish the safety risks that could result from habituation and food-conditioning of polar bears. ROP 4 would reduce safety risks for both humans and bears by ensuring that measures are in place to address the risks of, and solutions for, bear-related problems and to follow accepted practices for deterring bears around facilities, when necessary, through a polar bear interaction plan.

The highest number of documented historical polar bear dens and the greatest area of potential maternal denning habitat occur in the high and medium potential hydrocarbon zones, where development activities would be most likely to occur. Because of this, the potential impacts of waste handling and human/bear interactions under this alternative would be the most different from Alternative A and would be greater than those under the other action alternatives.

Under ROP 10, the requirement to attempt to locate dens, plus the 0.5-mile and 1-mile buffers for seismic and heavy equipment operation around occupied dens of grizzly and polar bears, respectively, would help to reduce the impacts of behavioral disturbance on denning bears (as well as birth lairs of ringed seals on land-fast ice along the coast) throughout the entire program area. Even so, complete detection of occupied bear dens is unlikely to be achieved; the 25 to 54 percent rate of detectability of occupied dens using airborne FLIR means that 6 to 11 undetected maternal dens may be exposed to disturbance during 3D seismic exploration of the entire program area.

Fewer dens would be disturbed during the development and production phases because the areas affected would be smaller than the intensive 3D seismic grid surveyed over the entire program area. Under the current ITR/LOA process to the west, the USFWS implements protective measures around a maternal polar bear den once it is discovered. This includes applying a 1-mile no-disturbance buffer around the den site and 24-hour monitoring of the den site until the bears leave the den. The proposed lease stipulations applicable to Alternative B do not apply these requirements to all development and production activities.

The requirement to obtain permits before installing fences to capture snow under ROP 15 (identical under all action alternatives) could alleviate potential conflicts with denning bears. Pregnant polar bears could be attracted early in the denning season to drifts in the lee of snow fences, which could create suitable denning habitat if the topography allows drifts to become deep enough.

Alternative C

Under Alternative C, the areas not offered for lease and the NSO areas—0.5- to 4-mile buffers around 17 rivers and streams, the Canning River delta and lakes, and three springs—would encompass 79 percent of known dens and 90 percent of maternal denning habitat (**Table 3-30** and **Table 3-31**), affording an intermediate level of protection for denning polar bears among the action alternatives.

The 34 percent of the program area not available for leasing under Alternative C contains 34 percent of the maternal denning habitat but only 8 percent of the known dens (**Table 3-30** and **Table 3-31**). In contrast, the various NSO areas contain 55 percent of the denning habitat and 72 percent of the dens, reducing the potential for impacts from program-related habitat loss and disturbance to less than Alternative B. Seismic surveys would be permitted only in the 1,037,200 acres available for leasing, rather than the entire program area (1,563,500 acres) permitted in Alternative B. Under Alternative C, the areas where seismic surveys would be permitted include 12,000 acres of maternal denning habitat, which is 6,200 fewer acres of denning habitat compared to Alternative B.

Under Lease Stipulation 5, the coastal polar bear denning river habitat zone (see **Map 2-4** and **Map 2-6** in **Appendix A**) subject to NSO and associated TLs totals 105,400 acres under Alternative C. Under Alternative C, this zone constitutes 6.7 percent of the program area and 8.8 percent of the terrestrial denning unit of designated critical habitat in the program area. Despite being such small percentages of that unit of critical habitat, the stipulated areas within 5 miles of the coast and 1 mile of the Sadlerochit, Niguanak, and Katakturuk Rivers and Marsh and Carter Creeks encompass 37 percent (17 of 47) of the maternal dens documented in the program area under Alternative C.

In addition to the specific protection of maternal denning habitat in the 5-mile coastal denning zone designated under Lease Stipulation 5, Lease Stipulations 1 and 2 under Alternative C would protect more denning habitat. This would be the result of prohibiting permanent facilities in NSO buffers within 0.5 to 4 miles of the 17 rivers and streams and 0.5 miles of the other water bodies listed under those two stipulations. Lease Stipulation 3 would protect additional denning habitat by excluding leasing and instituting 3- to 4-mile NSO buffers around Sadlerochit Spring, Fish Hole 1 on the Hulahula River, Tamayariak Spring, Okerokavik Spring, and along the east bank of the Canning River.

The various stipulations restricting facilities and activities in coastal habitats would reduce potential behavioral disturbance of polar bears moving along the coastline throughout most of the year. Surface disturbance under Alternative C would be approximately 1,464 acres, a reduction of 536 acres compared to the 2,000 acres anticipated under Alternative B. In the NSO area under Lease Stipulation 5, TLs would reduce disturbance of polar bears by prohibiting all program-related activities, including seismic exploration, within 1 mile of mapped denning habitat up to 5 miles inland between October 30 and April 15; therefore, they would confer more protection than does the NSO designation, which applies only to permanent infrastructure.

In addition, the TLs under Lease Stipulations 4 and 9 would reduce disturbance between May 15 and November 1, or whenever sea ice is 10 miles or more from shore, whichever occurs later. They would do this by restricting program-related activities within a 2-mile coastal buffer, extending protections 1 mile farther inland than under Alternative B.

In all, under Alternative C, 90 percent of the maternal denning habitat for polar bears within the program area is protected through areas not open to lease sales, prohibiting permanent facilities, controlled surface lease stipulations, or by timing limitations (**Table 3-31**).

As with the other two action alternatives, ROPs 1 and 2 would reduce the potential for attraction to waste and would greatly diminish the safety risks that could result from habituation and food-conditioning of polar bears, and ROP 4 would further reduce the safety risks for both humans and bears. ROP 10 would reduce the impacts of behavioral disturbance on denning bears (and birth lairs of ringed seals on landfast ice) to the greatest degree among the action alternatives, most similar to Alternative A.

Alternative D

Under Alternative D, the areas not offered for lease and the NSO areas would encompass the locations of 99 percent of all dens and maternal denning habitat (**Table 3-30** and **Table 3-31**). Alternative D allows fewer facilities, road miles, and total estimated acres of surface disturbance (1,040 acres; **Table C-5 RFD Appendix C**) than Alternatives B and C. As with Alternative C, seismic exploration would be permitted only on areas available for leasing, which includes 8,900 acres of maternal denning habitat, the fewer than Alternatives B and C.

Under Lease Stipulation 5, any infrastructure permitted within 5 miles inland of the coastline must be designed to avoid impeding polar bears seeking to establish or leave dens inland. This design consideration would help protect movement corridors of pregnant females (early winter), females with cubs (spring), and movements of all bears (fall). This specific guidance is not included in Lease Stipulation 5 under Alternative B or C.

Lease Stipulations 1 and 2 under Alternative D would protect more denning habitat than the same stipulations under Alternatives B and C. Under Alternative D, facilities are prohibited in NSO buffers within 0.5 to 4.0 miles of the 17 rivers and streams listed; within 0.25 mile of other rivers and creeks; and 0.5 mile of the other water bodies listed under those two stipulations.

Lease Stipulation 3 under Alternative D would minimize the disruption to polar bear denning habitat in areas with perpetual springs and associated aufeis. Under Alternative D, no leasing and no new infrastructure would be permitted within 1-13 miles of four listed springs and associated aufeis fields. Lease Stipulation 14 applies only to Alternative D and D2 and requires polar bear den surveys and exclusion zones around known dens during the denning season. It also establishes requirements for monitoring and reporting to the USFWS. Although similar requirements are listed under ROP 10, ROP 10 is specific to overland moves and seismic work and do not apply to ice roads after construction. Lease Stipulation 14 would minimize disturbance to denning polar bears from all winter activities and would not be a stipulation under Alternative B or C.

Under Alternative D, ROP 34 would further minimize the effects of low-flying aircraft on denning polar bears by requiring aircraft to maintain an altitude of at least 2,000 feet above ground level within 1.0 mile of maternal polar bear denning habitat. This TL would be in effect during the maternal denning period between October 30 and April 30. Also, operators would be required to avoid flying over areas where polar bears are known to congregate, such as near bone piles on land from August to October. These requirements reduce aircraft to a greater degree than action alternatives B and C.

In all, under Alternative D, 99 percent of the maternal denning habitat for polar bears within the program area is protected through areas not open to lease sales, prohibiting permanent facilities, controlled surface lease stipulations, or by timing limitations (**Table 3-31**). Of this, 51 percent of polar bear maternal denning habitat would not be open for lease sales.

Alternative D2

Compared to the other action alternatives, Alternative D2 protects the most acreage of maternal polar bear denning habitat. Alternative D2 makes 14,600 acres of maternal polar bear denning habitat unavailable for leasing and 2,500 acres of maternal denning habitat subject to NSO (**Table 3-31**). Combined, the areas unavailable for leasing and subject to NSO would encompass 94 percent of all den locations (**Table 3-30**). Although this total is lower than Alternative D, a greater proportion of these dens are in areas that would not be offered for lease, providing the greatest protection compared to other action alternatives (**Table 3-31**). Alternative D2 would also allow the fewest number of facilities, road miles, and total estimated acres of surface disturbance (995 acres; Table C-5, Appendix C) of the action alternatives. Seismic exploration would be permitted only in areas available for leasing, which under Alternative D2 includes 3,700 acres of maternal denning habitat, the fewest acres of the action alternatives (**Table 3-31**).

Lease Stipulations 1 and 2 under Alternatives D and D2 would protect more denning habitat than the same stipulations under Alternatives B and C. Additionally, facilities are prohibited in NSO buffers within 0.25 to 4.0 miles of the 29 listed rivers and streams, which would provide protections for denning habitat. Lease Stipulation 3 under Alternatives D and D2 would minimize the disruption to polar bear denning habitat in

areas with perpetual springs and associated aufeis. No leasing or new infrastructure would be permitted within 1-13 miles of four listed springs and associated aufeis fields.

Lease Stipulation 4 under Alternatives D and D2 would minimize the disruption to polar bear denning habitat and disturbance to bears using near shore areas. Oil and gas activities such as drilling, seismic exploration, and testing, would not be allowed on the major nearshore marine waters, lagoons, barrier islands, and coastal islands between May 15 and November 1 or when sea ice edge (as defined by Fetterer et al. 2017) is 10 miles distant or greater from the coast each season, whichever is later.

Under Alternative D2, Lease Stipulation 5, no leasing would be conducted from the coast to 1-mile inland within the critical denning habitat in the northwest portion of the Coastal Plain near the Canning and Staines Rivers and in the Camden Bay area. Lease Stipulation 5 also imposes a timing limitation that prohibits oil and gas activities, including seismic exploration and testing, between October 30 and April 30 from the coastline to 2 miles inland. As with Alternative D, Lease Stipulation 5 indicates that any infrastructure permitted within 5 miles inland of the coastline must be designed to avoid impeding polar bears seeking to establish or leave dens inland. This design consideration would help protect movement corridors of pregnant females (early winter), females with cubs (spring), and movements of all bears (fall). This specific guidance is not included in Lease Stipulation 5 under Alternative B or C.

As with Alternatives C and D, exceptions to NSO would be made for roads, pipelines, barge landings, and docks. However, only one-time exceptions may be granted in some areas not offered for lease, such as coastal areas and wilderness boundary setbacks. To receive an exception, the operator would have to demonstrate that there are no practical alternatives to accessing subsurface resources, the proposed action would need to maintain resource functions, and the proposed action would comply with other applicable laws (see Lease Stipulations 1, 2, 4, 5, 9, and 10).

Lease Stipulation 14 would only apply to Alternatives D and D2 and requires polar bear den surveys and exclusion zones around known dens during the denning season and establishes requirements for monitoring and reporting to the USFWS. Although similar requirements are listed under ROP 10, that ROP is specific to overland moves and seismic work and would not apply to ice roads after construction. Therefore, Lease Stipulation 14 would further minimize disturbance to denning polar bears from all winter activities.

Under Alternative D2, ROP 34 would further minimize the effects of low-flying aircraft on denning polar bears by requiring aircraft to maintain an altitude of at least 2,000 feet above ground level within 1.0 mile of maternal polar bear denning habitat. during the maternal denning period from October 30 and April 30. Operators would also be required to avoid flying over areas where polar bears are known to congregate, such as near bone piles on land from August to October. These requirements limit aircraft activity to the greatest degree among the action alternatives.

Alternative D2, like Alternative D, would require developers to submit a Master Development Plan (Lease Stipulation 13) prior to constructing an oil and gas development. The Master Development Plan would reduce potential impacts polar bear denning habitat by attempting to eliminate or minimize redundant infrastructure and the creation of minimally utilized areas bounded by gravel, which would reduce a proposed development's overall footprint.

Considering all Lease Stipulations and ROPs, Alternative D2 protects 98 percent of the maternal denning habitat for polar bears within the program area through areas not open to lease sales, prohibiting permanent facilities, controlled surface lease stipulations, or by timing limitations (**Table 3-31**). Additionally, 72 percent

of polar bear critical habitat would not be open for lease sale under Alternative D2, which is an increase from the 44 percent under Alternative D.

Transboundary Impacts

Polar Bear

Polar bears of the SBS stock range throughout much of the Beaufort Sea, routinely crossing the Alaska/Yukon border; thus, they are a shared resource subject to international agreements between the US and Canada and with other Arctic nations. Post-leasing activities and related impacts affecting bears in the program area have the potential to affect Canadian users of this resource, specifically Canadian First Nations hunters, in the Inuvialuit Settlement Region of northern Yukon and the Northwest Territories.

As described earlier, the subsistence harvest of this stock of bears is managed under the Inuvialuit-İñupiat Agreement established between Indigenous hunters in Alaska and Canada. That harvest is subject to a quota¹² that is based on current assessments of the size, trend, and health of the bear population and is reviewed periodically; therefore, any additional mortality that affects the SBS stocks could have repercussions for the harvest quota and the hunters in both nations who are party to the agreement. Cub mortality could be from oil spills in the marine environment or from females prematurely abandoning undetected dens during 3D seismic exploration or other activities.

Whales and Seals

All species of whales and seals in the program area also occur in Canadian waters to the east and in Russian waters to the west of the marine transportation route. Bowhead and beluga whales represent the strongest connectivity among the Pacific Arctic nations. This is because the migrating Beaufort stocks of both species transit the American Beaufort Sea to summer in the Canadian Beaufort Sea, returning westward in the fall. Bowhead whales cross the Chukchi Sea and transit through Russian waters during their fall migration. Ringed, spotted, and bearded seals also use habitat throughout the Pacific Arctic, regardless of international boundaries.

The proposed action alternatives are not anticipated to have population-level impacts on whales or seals in the program area or along the marine transportation route. The International Whaling Commission counts the US and Russia among its 88 member countries. It regulates whaling and addresses conservation issues, including bycatch and entanglement, ocean noise, pollution and debris, collision between whales and ships, and sustainable whale watching. There is no similar global commission for pinnipeds; instead, they are protected by national laws and bilateral working groups, such as the US-Russia Marine Mammal Working Group.

Cumulative Impacts

Overall, the impacts of oil and gas exploration and development on marine mammals in the central Beaufort Sea have been short term, with no population-level impacts. Section B.2.2, Climate and Meteorology (**Appendix B**), describes the numerous changes being experienced by the SBS stock of polar bears due to the loss of sea ice habitats in recent decades from climate warming. The rapid rate and magnitude of changes in the sea ice habitats that polar bears rely on primarily poses the greatest cumulative threat to the population. Changes in sea ice are caused by global factors that are not controllable without sustained international efforts to reduce GHG emissions. The effects of climate change on sea ice habitat are resulting in cascading changes in weather and habitat conditions across the Arctic, with attendant consequences for polar bears; however, the

¹²Currently 56 bears total: 35 in Alaska and 21 in Canada (Miller et al. 2018)

situation is especially concerning for the SBS stock, one of three judged to have the highest vulnerability to the effects of climate change.

To summarize the effects and consequences of climate change, the earlier retreat of sea ice in spring and the later advance in fall is resulting in a longer open-water season and decreases in sea ice concentration, thickness, and length of the ice-cover season. In response, polar bears have shown increases in movements, including swimming, time spent active, and time spent in marginal habitats, thus increasing energy expenditure. Models predict decreased survival of polar bears in the SBS population with reduced sea ice coverage, including reductions in breeding rates, cub survival, and recruitment of young bears into the breeding population.

More bears are coming ashore and spending more time on land, arriving earlier and departing later. On shore, they have more difficulty catching prey, spend longer periods fasting, and have increased chances of encountering humans, thereby increasing the risk of being killed in defense of human life. Pregnant females are making increased use of terrestrial habitats for maternal denning, while warming temperatures, increased precipitation, and longer growing seasons have negative implications for the stable conditions required for maternal denning.

The decreased availability of energy-rich, high-fat foods and long fasting periods increase the probability of nutritional stress. While whale-bone piles provide important supplemental food sources locally, the availability of whale remains from subsistence harvests is not likely to provide a sufficient food source to replace ice seals in polar bear diets, as sea ice continues to decline. Also, the congregation of polar bears on shore around Kaktovik poses increased risks of susceptibility to oil spills, disease transmission, and aggressive or lethal interactions with humans.

These impacts of climate change are occurring now and are predicted to continue until global action reduces the GHG emissions that are driving the changes. While it is challenging to project the incremental effects of burning the oil and gas that may be extracted from the program area, it is certain that doing so would contribute incremental impacts on climate change (see **Section 3.2.1**).

Greenhouse gas (GHG) emissions from program-related activities would combine with global GHG emissions and incrementally contribute to the ongoing and projected climate change trends described above. The framework described in a recent study by Amstrup and Bitz (2023) was applied to assess the potential extent of this contribution and the possible impacts on polar bears. This framework estimates distinct demographic impacts to polar bears from discrete volumes of GHG emissions. For the SBS subpopulation, there could be a 0.065 percent reduction in recruitment for each gigaton (Gt) of GHG released into the atmosphere. Based on the estimated GHG emissions that could occur from lease sales through 2053 (**Table 3-1**), under Alternative B, Gross GHG emissions could lead to a 0.038 percent reduction in recruitment, and a 0.015 percent recruitment reduction based on Net GHG emissions. For Alternative C, Gross and Net GHG could lead to a 0.036 percent and 0.014 percent reduction in recruitment, respectively. For Alternatives D and D2, Gross and Net GHG could lead to a 0.015 percent and 0.006 percent reduction in recruitment, respectively.

These estimates, and the estimates that can be derived for other polar bear subpopulations, are viewed with low confidence given data deficiencies acknowledged by Amstrup and Bitz (2023) and disconnects between their results and observed population trends. For instance, Amstrup and Bitz (2023) noted that the level of estimated impact is directly related to the mass of bears when they come on shore in autumn, and those data are not currently available for SBS bears. Instead, Amstrup and Bitz used estimates from Western Hudson Bay, which represents an entirely different ecoregion for polar bears (Amstrup et al. 2008). Additionally, the

analysis of Amstrup and Bitz (2023) did not acknowledge the supplemental energy that many bears in the SBS subpopulation obtain from subsistence whale remains in northern Alaska (Griffen et al. 2022) which could further reduce the estimated impacts. The study by Amstrup and Bitz (2023) also acknowledges that their results for the adjacent Chukchi Sea subpopulation, for which they project the largest rate of recruitment impacts of any polar bear stock worldwide, does not fit with empirical studies that show the Chukchi Sea subpopulation still appears to be doing well despite past and ongoing sea ice loss in that region (Rode et al. 2014, Regehr et al. 2018). Thus, there is a need to cautiously apply these results for this analysis. Overall, it remains difficult to project potential GHG impacts to polar bears with any reasonable certainty given limitations in existing data and modelling techniques, and the nuanced and variable relationships between polar bears subpopulations and sea ice.

Given the similar and very small impact of each action alternative's GHG emissions estimated for polar bear populations in this type of analysis, the incomplete or unavailable information required to reliably estimate such impacts is not essential to a reasoned choice among lease sale alternatives (see 40 CFR 1502.22 [2019]).

As explained earlier, however, managing climate change is beyond the ability of the agencies responsible for managing oil and gas activities in the program area; thus, those agencies must focus instead on avoiding and otherwise mitigating other cumulative incremental effects on the polar bear population.

The principal activities in Arctic Alaska contributing to cumulative effects on polar bears and other marine mammals are subsistence harvesting and changes in the activities of local communities, existing oil and gas development, commercial transportation, and management and research actions by federal and state agencies. The USFWS (2016, 2017) has recognized effective management of these activities as being especially important.

Thus far, analyses of the risks posed by these activities at existing levels have shown them to be far less of a threat to polar bear populations than those posed by climate warming through sea ice loss and altered prey availability (Atwood et al. 2016a; USFWS 2016; Bromaghin et al. 2021). The greatest component of human-caused removal for the SBS stock is harvesting by Indigenous hunters, which is important because of its high subsistence and cultural values. Under the Inuvialuit–Inupiat Agreement, harvest quotas have been reduced in the past as the SBS population has declined. Human-caused removal is an important factor affecting polar bear demography and sustainability (Regehr et al. 2015).

Tourism is growing in Kaktovik, with a growing number of commercial enterprises offering viewing opportunities of polar bears and recreational travel in the Arctic Refuge; however, impact assessments of those activities were not available to review for this analysis. Kaktovik Inupiat Corporation (KIC) has applied for a right-of-way with U.S. Department of Interior to construct a seasonal snow trail to connect the community to the existing road system in Deadhorse (KIC 2021). The proposed route would generally follow the coastline from Kaktovik through the program area and through terrestrial polar bear denning habitat, which could potentially expose denning polar bears to disturbance.

Most industrial development in the established oil fields along the Beaufort Sea coast has occurred in terrestrial habitats, which, except for a narrow coastal band, typically are used much less by polar bears throughout the year than are marine habitats offshore. Industry reporting under the ITR/LOA process in those fields has demonstrated that required mitigation has been effective at keeping both incidental and intentional take at negligible levels. However, USFWS acknowledges there are limitations in the available data as there has been no systematic effort to find all dens that may be adjacent to existing infrastructure and that den monitoring has not consistently observed den emergence and departure (86 FR 42982, August 5, 2021).

Recent expansions from the Prudhoe Bay, Kuparuk, and Alpine oil fields into NPR-A to the west and Point Thomson to the east have had only negligible impacts. Those established developments and projected future expansions in the NPR-A, such as the Willow project, have occurred in areas of habitat that are used less by SBS polar bears than the Coastal Plain, especially for maternal denning.

The greater width of the terrestrial denning unit of critical habitat (20 miles, rather than 5 miles) east of the Shaviovik and Kavik Rivers, including the program area, reflects higher probability of use, and thus potentially greater impacts, than has been experienced to date farther west. The greater use of the program area by polar bears underscores the importance of developing effective new ITRs concerning post-leasing activities in the program area.

Over time, development has expanded into the marine environment, starting with the construction of West Dock in the Prudhoe Bay field. It was followed by the Endicott Project, which was the first offshore production facility in the region, the Northstar Project, located on artificial islands offshore from Prudhoe Bay, and the Oooguruk and Nikaitchuq islands northwest of the Kuparuk field. Offshore production facilities (Endicott, Northstar, Oooguruk, and Nikaitchuq islands) have recorded the highest incidences of polar bear sightings and nonlethal hazing incidents in the established oil fields in recent years, accounting for 47 percent of polar bear observations (182 of 390 sightings) from 2005 to 2008, the most recent period for which such statistics are available (76 FR 47010; 81 FR 52276).

Those analyzing the cumulative effects of oil and gas leasing, exploration, development, and production by the National Research Council (NRC 2003: p. 105) concluded that “industrial activity in the marine waters of the Beaufort Sea has been limited and sporadic and likely has not caused serious cumulative effects on ringed seals or polar bears.” Nevertheless, continued expansion of oil and gas development along the Arctic coast on both land and sea may reach a level at which such effects become problematic for polar bears in the future (Amstrup 2003a; USFWS 2009).

Offshore projects linked to shore facilities by subsea pipelines, such as Northstar or the potential Liberty Project, pose a risk of a large marine oil spill, although the probability of a spill occurring is very low (Wilson et al. 2017). If a large spill does occur, the likelihood that it would contaminate areas occupied by large numbers of polar bears is also low for areas west of the project area. A nearshore spill along the coast of the project area could expose many polar bears to lethal and sub-lethal levels of oiling (Wilson et al. 2024). If the bears do not actively avoid oiled areas and there are no management actions to keep bears away, this level of exposure could require decontamination and have population-level consequences for the SBS stock.

Marine mammals are exposed to potentially toxic chemical compounds in the water and the food web that have been transported to the Arctic from around the world through the atmosphere, water currents, and migrating animals (AMAP 2010). As a top predator, polar bears tend to have higher levels of potentially toxic compounds that bioaccumulate in the food chain, such as organochlorines and mercury (Braune et al. 2005; AMAP 2010; Routti et al. 2019). At the time of listing under the ESA, however, contaminant levels in Alaska polar bears were considered relatively low compared to other stocks (USFWS 2017c). Alaska stocks, including the SBS stock, continue to have some of the lowest concentrations of polychlorinated biphenyls, chlorinated pesticides, and flame retardants among all polar bear stocks (McKinney et al. 2011; Routti et al. 2019), although SBS bears had the highest concentrations of chlordanes among all stocks (Routti et al 2019). Further, perfluoroalkyl substances were recently detected in serum (Liu et al. 2018).

Onshore oil and gas production, such as that proposed in the program area, typically requires large sea lifts using barges to transport facility modules, equipment, and material from southern ports to docks on the

Beaufort Sea coast. Onshore infrastructure also can affect marine mammals through the need for ice roads that cross ringed seal habitat in landfast ice, and ice and gravel infrastructure can affect polar bear habitat and maternal polar bear denning, as described above. These impacts of onshore production would likely affect polar bears through disturbance in coastal barrier-island and denning habitats, especially during construction.

Past responses of ringed seals to oil and gas activities have consisted primarily of minor behavioral reactions, with a few exceptions related to tracked vehicle activity in nearshore areas. In 1998, a vehicle crushed a lair, killing one seal pup and injuring the female. In 2018, two separate events involving vehicles exposed seal lairs, causing the inhabitants to flee. The BLM requirements for buffers around lairs and LOAs issued by NMFS would ensure that the impacts of onshore infrastructure development in the RFD (**Appendix C**) would not add to the past, ongoing, or future impacts.

The combined effects of likely future actions, particularly those located in the arctic marine environment, may contribute to adverse effects on polar bear, seal, and whale populations in the future, primarily through expansion of coastal and offshore development and the increased risk of a major marine oil spill. Impacts on marine mammals would mostly be short term, with the potential for a small number of deaths. Considering the incremental contribution of the action alternatives to cumulative oil spills, the added oil spill impacts of past, present, and future spills would continue to have short-term, localized effects on marine mammals, with limited potential for a few deaths.

Considering all past, present, and reasonably foreseeable future actions, by far the most significant factor affecting Arctic marine mammals is ongoing climate change from GHG emissions and the resulting loss of sea ice habitat. The effects of climate change would primarily influence the degree and rate of cumulative impacts on polar bears and other marine mammals. For whales and seals, the additional vessel traffic and coastal activity associated with the proposed action is not expected to have population-level impacts. Most of the impacts of these actions will occur on land. For polar bears, increases in human activity within the program area affecting bears that are increasingly nutritionally stressed could have negative population-level impacts.

Considering the effects of oil and gas activities in conjunction with other human/bear interactions, the effects of oil and gas activities in the program area would contribute incremental negative effects on the SBS stock of polar bears. Disturbance from seismic exploration, building structures, roads and pads, and conducting operations would have the largest consequence to polar bear populations by reducing the production of cubs. Such impacts would combine with the projected impacts of climate change, ongoing human-caused removals, and other reasonably foreseeable future actions to impede the recovery of the SBS stock to previously estimated levels. Disturbance and displacement are also predicted to increase as sea ice diminishes and polar bears spend more time on land due to climate change. Although all of the alternatives include mitigation measures to avoid injury and mortality, Alternative B offers the least protection by allowing seismic activity throughout the program area and allowing roads, pads, and structures throughout most of the area. Alternative C increases protections by limiting seismic exploration only to the leasable area and reducing the area available for infrastructure.

Alternative D further reduces the areas available to seismic exploration, leasing and infrastructure. That alternative also introduces requirements for den surveys and reporting to assist in avoiding existing dens and monitoring the effects of development on polar bears. Alternative D2 offers the most protection by offering the least area for leasing, protecting the areas of highest denning density along the Canning and Staines rivers from leasing and seismic surveys, and placing timing limitations on seismic activity to protecting both mothers and cubs from the disturbance associated with seismic exploration and oil and gas activities.

3.4 SOCIAL SYSTEMS

3.4.1 Landownership and Use

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on-the-ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. The reasonably foreseeable development scenario (**Appendix C**) identifies five phases associated with the hypothetical scenario: leasing, exploration, development, production, and abandonment and reclamation; therefore, the analysis considers potential impacts on landownership and use from on-the-ground activities. See **Appendix C** for the estimated time frames of analyzed phases and associated projected activities.

Potential impacts on landownership and uses are the result of decisions that change landownership or from lease stipulations that allow or restrict certain land uses. Landownership decisions, such as conveyance or transfers, can increase or decrease the amount of federal land and the type of management available for those lands. Use restrictions, such as those intended to protect resources or to reduce conflicts with other uses, can preclude the placement of new infrastructure or require special conditions for development. In areas subject to NSO, new land uses would be precluded, except where ANILCA allowances would allow construction such as roads allowed under ANILCA Title XI provisions. Any new uses would be required to locate in areas outside of the NSO area. Depending on the use, developing the use outside of the NSO area may not be physically or commercially viable. In areas subject to CSU or TLs, additional requirements, such as long-term monitoring, special design features, and special siting requirements, could restrict a future project's location or viability.

Alternative A

Under Alternative A, there would be no federal minerals offered for future oil and gas lease sales in the program area and therefore no direct or indirect impacts on uses. Therefore, there would be no change in landownership under Alternative A.

Impacts Common to All Action Alternatives

Under all action alternatives, areas would be made available for lease sales consistent with PL 115-97. Impacts are analyzed through five phases of development—leasing, exploration, development, production, and abandonment and reclamation—and they are driven by demand for petroleum. This would result in the subsequent development of oil and gas exploration and production well pads, CPFs, roads, pipelines, barge dock, a STP, and other ancillary uses to support oil and gas development. The BLM would grant ROWs or easements across the Coastal Plain for access and construction of facilities, including in unleased areas. Impacts from the five phases of development on land uses would vary under the action alternatives, as discussed below, the size, type, and amount would be nearly the same.

The five phases of oil and gas development, as described in **Appendix C**, in the program area would indirectly affect land uses in and surrounding the community of Kaktovik. As a point of arrival and departure for air travel to the program area, new or expanded residential, commercial, industrial, and civic land uses would be expected, especially over the long term. Areas south of Kaktovik's current development footprint are more likely to experience the most notable growth (NSB 2015a).

Potential impacts from the five phases of development on the program area may affect Native allotments and ANCSA corporation uses there. Native allotments cover approximately 900 acres of the Coastal Plain, primarily concentrated near rivers, and these allotments support subsistence activities and uses. During the exploratory phase, seismic exploration related to the leasing program may occur in the program area. Seismic activities could cause short-term impacts for the use of certain Native allotments or public lands adjacent or in proximity to exploratory activity.

Construction of infrastructure near the Native allotments may also reduce the desirability of using a specific area or allotment, primarily from exposure to dust, air pollution, noise, helicopters, and road traffic from development; however, Lease Stipulation 11 would prevent the development of oil and gas-related infrastructure on Native allotments, unless the owner gives written consent. See **Table 3-32**, below, for the acreage of Native allotments that may be affected by oil and gas development in the Coastal Plain.

Table 3-32
Lease Stipulations Near Native Allotments by Alternative

Lease Availability/Stipulations within 3 miles of Native Allotments (acres)	B	C	D	D2
Not offered for lease sale	0	52,300	90,200	124,200
Available for lease sale: subject to NSO	63,200	134,100	100,000	64,400
Available for lease sale: subject to CSU	0	1,200	600	1,700
Available for lease sale: subject to TL	57,400	0	400	100
Available for lease sale: subject to standard terms and conditions	71,200	4,100	400	1,200

Source: BLM GIS 2023

Note: Acreages are rounded up or down to nearest 10.

Under all action alternatives, ANCSA corporation mineral interests may be affected throughout the five phases of development. Lease stipulations and ROPs from the leasing program may affect ANCSA corporation mineral interests by restricting access to mineral opportunities or enforcing NSOs next to ANCSA corporation lands. Site-specific impacts on Native allotments and corporations would vary under all action alternatives. For a description of subsistence use impacts that may occur near Native allotments, see **Section 3.4.3**; for a description of mineral interest impacts on ANCSA corporations, see **Sections 3.2.5** and **3.2.6**.

There would be no change in landownership under any of the action alternatives. The USFWS would continue to manage all federal lands in the Coastal Plain, including both leased and unleased areas. Under all action alternatives, the BLM would be responsible for managing all aspects of the oil and gas program. PL 115-97 assigned the BLM the responsibility of making oil and gas program decisions; however, the BLM intends to coordinate with the USFWS before making decisions. The CCP could be revised to reflect all purposes of the Arctic Refuge in the Coastal Plain, as amended by PL 115-97.

Alternative B

The nature and types of impacts on land uses under Alternative B would be the same as those described under *Impacts Common to All Action Alternatives*. Making the entire program area available for lease sale and applying NSO stipulations to only 23 percent of the lands available for leasing would allow land to be developed in most areas for oil and gas projects. Although NSO stipulations under Alternative B would generally preclude surface-disturbing activities along rivers and streams (Stipulation 1) and nearshore marine, lagoon, and barrier islands (Stipulation 4), essential pipelines and road crossings would be permitted through the setback areas in accordance with PL 115-97 and ANILCA. Gravel mines could also be permitted in setback areas.

Under Alternative B, there would be 71,200 acres available for lease sale, subject to STC, within 3 miles of a Native allotment. Additionally, seismic exploration would be allowed throughout the program area, which could cause short-term avoidance of using specific Native allotments or public lands. Impacts on ANCSA corporations would be as described under *Impacts Common to All Action Alternatives*, which includes the decrease in desirability of allotments for use due to incompatibility with subsistence uses and effects on subsistence resources. For example, wildlife may avoid Native allotment locations if there is noise disturbance present from adjacent oil and gas activity (see **Section 3.2.3**, Acoustic Environment). Lease stipulations would mitigate some impacts, and it is also possible that effects could be minimized due to the greater availability of lands available for leasing across the program area under Alternative B, allowing for more dispersed disturbance.

Alternative C

Under Alternative C, the nature and types of impacts on land uses would be the same as those described under *Impacts Common to All Action Alternatives*. Alternative C would make 526,300 acres (34 percent) unavailable for lease sale and an additional 708,200 acres (45 percent) subject to NSO (Lease Stipulations 1, 2, 4, 5, 7, 9, and 10). This would limit the locations where new uses could be developed to the remaining 329,000 acres (21 percent) of the program area. Seismic exploration would be allowed only in areas available for lease sale and would have similar impacts as those described under Alternative B but to a lesser extent. Impacts on ANCSA corporations would be as described under *Impacts Common to All Action Alternatives* and would be similar to Alternative B but on a smaller scale. Impacts would have the potential to occur across the 4,100 acres available for lease sale within 3 miles of a Native allotment in the program area subject to STC.

Alternative D

Under Alternative D, the nature and types of impacts on land uses would be the same as those described under *Impacts Common to All Action Alternatives*. Alternative D would make 797,700 acres (51 percent) of the program area unavailable for lease sale and an additional 726,300 (46 percent) subject to NSO. Lease stipulations for Alternative D would be similar to Alternative C; however, Lease Stipulation 12 would introduce an additional NSO to prohibit permanent oil and gas facilities and infrastructure in areas of thawed, unstable ice-rich soils and yedoma deposits. This would limit the locations where new uses could be developed to the remaining 39,500 acres (3 percent) of the program area, 1,800 acres of which would be subject to TL. Impacts from seismic exploration would be similar to Alternative C, but they would cover less acreage due to the reduced area available for lease. Impacts on ANCSA corporations would be as described under *Impacts Common to All Action Alternatives*, although on a slightly smaller scale. Exploration and development could occur within the 400 acres available for lease sale within 3 miles of a Native allotment in the program area subject to STC. As a result, Alternative D would result in fewer impacts on land uses of Native allotments compared with Alternative C due to fewer acres available for lease within proximity to these parcels.

Alternative D2

Alternative D2 makes the PL 115-97 statutory minimum of 400,000 acres available for lease sale within the area of highest hydrocarbon potential, located in the northwest portion of the program area. Under this alternative, the nature and types of impacts on land uses would be similar to those described under *Impacts Common to All Action Alternatives* but concentrated within a smaller area. Alternative D2 would make 1,163,500 acres (74 percent) of the program area unavailable for lease sale and an additional 231,700 (24 percent) subject to NSO. Seismic exploration would only be allowed in areas available for lease (400,000 acres).

Compared with Alternative D, there would be three times the amount of land (1,200 acres) available for lease sale subject to STC within 3 miles of Native allotment (**Table 3-32**). As a result, Alternative D2 could result in greater impacts on land uses of Native allotments because more acres would be available for oil and gas development (including seismic exploration) within proximity to these parcels. However, the RFD estimates that the total area of surface disturbance under Alternative D2 would be 995 acres, the lowest of the four action alternatives (see **Appendix C**), therefore, minimizing potential impacts to a smaller area and reducing impacts on nearby Native allotments.

The requirements under Lease Stipulation 12 also differ from those described under Alternative D; permanent oil and gas infrastructure would not be prohibited in NSO areas, though facility design would be required accommodate the thaw subsidence anticipated over the design life in areas of ice-rich soils and yedoma deposits. Impacts on ANCSA corporations would be as described under *Impacts Common to All Alternatives*, but on a lesser scale due to overall reduction in land available for leasing and subject to NSO.

Transboundary Impacts

There would be no direct or indirect transboundary impacts on landownership and uses under any of the action alternatives.

Cumulative Impacts

Cumulative impacts on landownership and uses would be the result of a change in the demand for lands to be transferred out of federal ownership to support a public use or demand for land uses associated with energy or mineral development. Past, present, and reasonably foreseeable future actions, described in **Appendix G**, that would cumulatively affect landownership and uses include future oil and gas exploration and production and associated demand for infrastructure, and community expansion, particularly near Kaktovik, with associated demand for land uses and potential land tenure actions.

Under all action alternatives, new oil and gas exploration and development, such as the Alaska LNG, Willow, or Greater Mooses Tooth projects, would increase the number and density of uses in the program area. Applications for uses would be processed on a case-by-case basis, subject to lease stipulations and other protective measures. NSO stipulations, particularly under Alternatives C and D could result in the concentration of new uses in smaller areas. As new oil and gas uses are developed in an area, the availability of those public lands for other oil and gas infrastructure would decline. Collocation or use of shared facilities would alleviate this potential impact.

Expanding interest in the program area would influence uses in nearby Kaktovik. Combined with past, present, and future actions, which include plans to expand community infrastructure and transportation facilities in the city, new oil and gas development could increase demand for new residential, commercial, civic, and industrial lands uses in the city. Additionally, the USFWS has received ROW applications for the installation, operation, and maintenance of a communication tower as well as for a snow trail to be developed across upland habitats within the program area. Under all action alternatives, the introduction of these ROWs could require coordination with other entities. Because Kaktovik's urban footprint is confined by the Beaufort Sea to the north, by public lands to the east and west, and by private lands to the south, there may be future interest in conveying lands out of federal ownership to accommodate new community development; however, an act of Congress would be required to convey lands in the Coastal Plain out of federal ownership.

3.4.2 Cultural Resources

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on cultural resources from on-the-ground activities. The effects of climate change described under *Affected Environment* above, could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Alternative A would not result in potential direct or indirect impacts on cultural resources because no leasing activity that could affect cultural resources would occur in the program area. Existing activities that could affect cultural resources would include people using Arctic Refuge lands and waters that could lead to purposeful or inadvertent damage to cultural resources. Additionally, natural processes, such as erosion, would continue to affect cultural resource sites under this alternative.

Impacts Common to All Action Alternatives

Potential impacts associated with the development of a lease could include physical destruction of or damage to all or part of a cultural resource, removal of the resource from its original location, change in the character of the resource's use, dating potential, or change of the physical features in the resource's setting (e.g., vibration, noise, visual, or olfactory) that contribute to the resource's importance and potential eligibility for the NRHP, or change in access to traditional use sites by traditional users.

In areas where avoidance does not occur, examples of ground-disturbing activities that could potentially cause direct impacts include excavation of material sites; construction and maintenance of gravel roads, pads, airstrips, bridges and culverts; construction of ice roads and pads; construction of VSMs for power lines and pipelines; and any other disturbance of the ground surface in the proximity of development project components. Lease Stipulation 4, which imposes NSO conditions in coastal waters, lagoons, and barrier islands, would reduce the potential for ground-disturbing activities to harm submerged archaeological sites; however, the authorizations for certain infrastructure under Lease Stipulation 4, such as pipelines, docks, and barge landings, could affect these types of sites.

Other activities and events that could potentially cause direct impacts on cultural resources include scientific and environmental surveys; seismic and other exploratory activities; damage caused by equipment during the exploration, development, production, and abandonment and reclamation phases of development projects; and unanticipated accidents, such as blowouts, spills, or fires, and subsequent cleanup activities (see **Appendix C** for description of the reasonably foreseeable development scenario). These activities, in addition to the infrastructure itself, could also introduce vibration, noise, visual, and olfactory impacts on cultural resources. Certain future impacts, such as oil spills, can contaminate site artifacts and organic materials to make them undatable. Section 4.3.12.2 in BLM 2012 provides additional discussion of potential direct impacts on cultural resources associated with oil and gas exploration and development.

Potential indirect impacts on cultural resources could also occur later in time or farther removed in distances. Indirect impacts on cultural resources could occur during pre-development activities (e.g., scientific, environmental, and seismic surveys), throughout the five phases of a development project, and during closure and reclamation. Examples of indirect impacts on cultural resources could include increased access and potential unauthorized removal, trampling, or dislocation of cultural resources and culturally sensitive areas by personnel and visitors; complete or partial destruction of a site from erosion, thawing permafrost, and thermokarsting; the loss of traditional meaning, identity, association, or importance of a resource; effects on beliefs and traditional religious practices; or neglect of a resource that causes its deterioration.

While potential impacts on specific cultural resource sites would differ by alternative (see discussion below), broader cultural impacts on belief systems/religious practices would be common across all alternatives. Particularly for the Gwich'in, who hold the program area as sacred ground to their culture and as *Izhik Gwats'an Gwandaii Goodlit* (Gwich'in Steering Committee 2004), the presence of development in the program area would constitute a cultural impact on the Gwich'in. This is because development in the program area would harm the caribou and other migratory resources (such as waterfowl) that migrate to the Coastal Plain to give birth.

This sacred pattern of migration and birth maintains the value of, and gives essence to, the Coastal Plain as the place where life began. This sacredness is based on the intergenerational traditional knowledge of the Gwich'in that is built on millennia of residence in the region (see Irving 1958 and Kofinas et al. 2002 for examples of this knowledge). Caribou are held in the highest regard by the Gwich'in and are the backbone of their cultural identity (Slobodin 1981). Any potential impacts on the resource would constitute a cultural effect. These effects, including those on belief systems, are also discussed in **Section 3.4.4**.

Both the Iñupiat and the Gwich'in have cultural and ethnographic ties to the program area, as evidenced by cultural sites, place names, traditional and contemporary uses, oral histories, and current beliefs and values. When these are viewed as a whole, these ties to land and place can be regarded as TCPs and/or cultural landscapes in the scope of the cultural resource regulatory framework.

These types of cultural resources have not been documented to date in the program area under the existing regulatory frameworks, although the wide array of individual TLUI and AHRS sites in the program area demonstrate the potential for these ethnographic resources, such as TCPs, cultural landscapes, and sacred sites, to be documented. While the available data (see *Affected Environment*, above) have not documented these types of cultural resources for Iñupiat or the Gwich'in in the program area, this absence can be attributed to lack of research and documentation rather than that they do not exist.

The Gwich'in in Arctic Village have stated that documented and undocumented TCPs do exist for them that could be affected by oil and gas leasing in the program area and that the Section 106 consultation process needs to fully consider these cultural resources. Other scoping testimony identified the Coastal Plain of the Arctic Refuge as a cultural landscape that provides for Indigenous communities and that the area should be explicitly analyzed as a traditional cultural landscape of the Gwich'in Nation.

In summary, given the ethnographic information currently available of the cultural importance of the Coastal Plain, and the undetermined location and nature of development in the program area, potential impacts on traditional belief systems/religious practices and other ethnographic resources, such as TCPs and cultural landscapes, particularly for the Gwich'in, would be adverse, regional, and long term. This is because places like the Sacred Place Where Life Begins would be impacted no matter where the development occurs in the Coastal Plain. Continued consultation with the tribes during the NEPA and Section 106 processes will

continue to explore options for minimization and mitigation measures related to ethnographic resources. For cultural resource sites in the program area that could not be avoided or that would experience other direct and indirect effects outside the footprint, the impacts would be adverse, local, and long term.

No potential adverse effects on documented specific cultural resource sites would be expected in areas where adequate investigation, such as surveys, consultation, and interviews, has occurred prior to development and where appropriate avoidance, minimization, or mitigation measures are implemented. The Section 106 process for addressing effects on historic properties has included the development of a programmatic agreement to address the process for identifying historic properties and resolving potential adverse effects through avoidance, minimization, or mitigation.

Lease Stipulations 1, 2, 3, and 4 include provisions to buffer various oil and gas activity areas where cultural resource sites have a higher potential of occurring, such as along certain rivers and streams, springs/aufeis, and coastal locations. ROPs already proposed include conducting cultural surveys before ground-disturbing activities begin (ROP 29) and cultural awareness training and orientation (ROP 40).

Alternative B

Under Alternative B, the types of potential impacts on cultural resources would be the same as those described above (*Impacts Common to All Action Alternatives*). Alternative B would make available the largest number of acres for potential leasing and development; therefore, in terms of direct and indirect impacts on cultural resource sites (e.g., TLUI, AHRS, RS 2477 trails), Alternative B could affect the greatest number of documented sites (**Table 3-33**). Forty-one AHRS and 44 TLUI sites are in areas that are open with STC or TLs and could experience ground-disturbing activities. RS 2477 trails #1649 and #914 also occur in these areas. An additional 56 AHRS and 12 TLUI sites are in areas of NSO and would have less potential to be affected, due to the reduced levels of ground-disturbing activities in the NSO areas. RS 2477 trails #1649, #1043, and #914 and the two shipwrecks occur in the NSO area.

**Table 3-33
Cultural Resource Sites by Action Alternative**

Alternative	STC/TL	CSU	NSO	Not Offered for Lease Sale
B	41 AHRS 44 TLUI 2 RS 2477	n/a	56 AHRS 12 TLUI 3 RS 2477 2 shipwrecks	n/a
C	1 AHRS	3 RS 2477	77 AHRS 48 TLUI 3 RS 2477 2 shipwrecks	15 AHRS 8 TLUI
D	6 AHRS 1 RS 2477		54 AHRS 23 TLUI 2 RS 2477 2 shipwrecks	35 AHRS 33 TLUI 1 RS 2477
D2	1 AHRS		30 AHRS 9 TLUI 1 RS 2477 1 shipwreck	65 AHRS 47 TLUI 3 RS 2477 1 shipwreck

Source: BLM and USFWS GIS 2022

Notes: Some larger sites may overlap multiple lease areas. This table does not include ethnographic resources and place names, which are addressed under *Impacts Common to All Action Alternatives*.

STC = Subject only to standard terms and conditions

TL = Timing limitations

CSU = Controlled surface use

NSO = No surface occupancy

Under Alternative B, there would be the greatest potential for impacts on the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site due to area available for leasing (1,563,500 acres) and the overlap between the areas available for leasing and the Gwich'in identified sacred site. These impacts would be greater should development and production occur within the identified boundaries of the site. However, some impacts would occur if development and production occurred adjacent to the Gwich'in identified sacred site.

Because Alternative B has the smallest setbacks from areas of highest potential for containing undocumented cultural resources, such as rivers and coastline, this alternative would have the highest likelihood for affecting undocumented resources. Potential impacts on cultural resource sites under Alternative B would be adverse, local (estimated 2,000 acres of development and general vicinity), and long term for sites that could not be avoided or would experience direct and indirect effects outside the footprint.

Alternative C

Compared to Alternative B, Alternative C would make available a fewer number of acres for potential leasing and development and therefore, in terms of potential direct and indirect impacts on documented cultural resource sites (e.g., TLUI, AHRS, and RS 2477 trails), Alternative C would affect a fewer number of sites. Only one AHRS site is in the areas subject to only STC or TLs that are open to leasing and could experience ground-disturbing activities (**Table 3-33**). An additional 77 AHRS and 48 TLUI sites are in the NSO area. These sites would have less potential to be affected, due to the reduced levels of ground-disturbing activities. Three RS 2477 trails occur in the NSO area; the two shipwrecks are also in the NSO area. Lastly, 15 AHRS sites and 8 TLUI sites are in areas not offered for lease sale under Alternative C.

Impacts to the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site would be minimized under Alternative C, compared to Alternative B, due to less acres being available for leasing (1,037,200 acres), of which fewer would overlap with the site. Like Alternative B, impacts would be greater where development and production occur within the Gwich'in identified sacred site.

Because Alternative C has a larger setback (compared to Alternative B) from areas of highest potential for containing undocumented cultural resources, such as rivers and coastline, this alternative would have a lower likelihood for affecting undocumented resources. Potential impacts on cultural resource sites under Alternative C would be of lower intensity than under Alternative B and would be adverse, local (approximately 1,464 acres of development and general vicinity), and long term for sites that could not be avoided or would experience direct and indirect effects outside the footprint.

Alternative D

Compared to Alternative B, Alternative D would make available a fewer number of acres for potential leasing and development and, therefore, in terms of potential direct and indirect impacts on documented cultural resource sites (e.g., TLUI, AHRS, and RS 2477 trails), Alternative D would affect a fewer number of sites. Six AHRS sites are in the areas subject to only STC or TLs that are open to leasing and could experience ground-disturbing activities (**Table 3-33**). Also, one RS 2477 trail occurs in this area.

An additional 54 AHRS and 23 TLUI sites are in the NSO area of Alternative D. These sites would have less potential to be affected, due to the reduced levels of ground-disturbing activities. Two RS 2477 trails occur in the NSO area; the two shipwrecks are also in the NSO area.

Lastly, 35 AHRS sites and 33 TLUI sites are in areas not offered for lease sale under Alternative D and would not experience impacts.

Alternative D would further reduce impacts to the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site, compared to Alternatives B and C, due to fewer acres being available to lease sale (765,800 acres) of which, many of those acres would be subject to NSO (726,300 acres). While some areas available for surface occupancy but subject to CSU, TL, or STC would be located within the site, potentially resulting in increased impacts, more areas would be located outside of the Gwich'in identified sacred site.

Because Alternative D has larger setbacks from areas of highest potential for containing undocumented cultural resources, such as rivers and coastline, than Alternatives B or C. Therefore, Alternative D would have a lower likelihood of affecting undocumented resources. Potential impacts on cultural resource sites under Alternative D would be of lower intensity than under Alternative B, and would be adverse, local (estimated 1,040 acres of surface development and general vicinity), and long-term for sites that could not be avoided or would experience direct and indirect effects outside the footprint.

In addition to the ROPs already proposed under Alternative B and C, Alternative D includes additional language related to the Coastal Plain's Section 106 programmatic agreement (ROP 29) and cultural awareness training and orientation that is designed in coordination with local traditional knowledge experts (ROP 40).

Alternative D2

Alternative D2 would make available a fewer number of acres for potential leasing and development and, therefore, in terms of potential direct and indirect impacts on documented cultural resource sites (e.g., TLUI, AHRS, and RS 2477 trails), Alternative D2 would affect the fewest number of sites. One AHRS site is in the areas subject to only STC or TLs that are open to leasing and could experience ground-disturbing activities (**Table 3-33**).

An additional 30 AHRS and 9 TLUI sites are in areas subject to NSO under Alternative D2. These sites would have less potential to be affected, due to the reduced levels of ground-disturbing activities. One RS 2477 trail as well as one shipwreck occurs in the NSO area. Lastly, 65 AHRS sites and 47 TLUI sites are in areas not offered for lease sale under Alternative D2 and would not experience impacts.

Alternative D2 would have the least impacts on the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site due to the focus on making areas available for leasing within areas high hydrocarbon potential (400,000 acres), which are further removed from the site. While more acreage would be available subject to STC (80,900 acres), these areas are located outside of the Gwich'in identified sacred site and therefore, impacts would be minimized.

Similar to Alternative D, Alternative D2 has the largest setbacks from areas with the highest potential for containing undocumented cultural resources, such as rivers and coastline, and therefore, Alternative D2 would have the lowest likelihood for affecting undocumented resources. Potential impacts on cultural resource sites under Alternative D2 would be of lower intensity than under Alternative B, and would be adverse, local (estimated 995 acres of surface development and general vicinity), and long-term for sites that could not be avoided or would experience direct and indirect effects outside the footprint. Of the action alternatives, Alternative D2 would have the fewest impacts on cultural resources, due to it having the largest area not offered for lease sale.

In addition to the ROPs already proposed under Alternative B and C and D, Alternative D2 includes additional language related to cultural awareness training and orientation that is coordinated with USFWS (ROP 40).

Transboundary Impacts

Transboundary impacts would be similar to those described above under *Impacts Common to All Action Alternatives*. For the Inuvialuit, oral histories and traditional knowledge attest to coastal uses that they encountered while traveling between the Inūpiat and Inuvialuit areas. Documented and undocumented cultural sites associated with this past use in coastal locations could experience direct and indirect impacts from development associated with exploration, development, production, and abandonment and reclamation.

Furthermore, certain subsistence species, such as the Porcupine Caribou Herd, polar bears, Arctic cisco, seals, whales, and grizzly bears, which move or migrate through the program area into Inuvialuit territory, have strong cultural significance. For example, the Inuvialuit portray the polar bear as a prominent cultural icon in their mythology, spirituality, storytelling, art, song, and other forms of cultural expression (Joint Secretariat 2015). Impacts on these subsistence resources would therefore have corresponding indirect cultural impacts on Inuvialuit (see **Sections 3.3.4., 3.3.5, and 3.4.3**).

The Canadian Gwich'in could also experience cultural impacts in relation to effects on the ethnographic resource of *Iizhik Gwats'an Gwandaii Goodlit* (see *Impacts Common to All Action Alternatives*). In terms of action alternatives and associated impacts, Alternative D2 would have the fewest impacts on cultural resource due to the lower likelihood for affecting undocumented cultural resource sites. The lower likelihood is because of the larger setbacks and also the more restrictive stipulations and ROPs, which would lead to fewer impacts on biological resources that have cultural importance to the Inuvialuit and Gwich'in.

Cumulative Impacts

Past, present, and reasonably foreseeable future activities, in combination with oil and gas development in the program area, would increase the potential for cultural resource impacts, both directly on specific cultural resource sites and other ethnographic resources such as TCPs and cultural landscapes. Past and present actions that have affected cultural resources are oil and gas exploration, development, and production; onshore and offshore transportation and infrastructure projects; past federal government decision-making (e.g., lack of funding for cultural resource inventories), increased recreation and tourism; scientific research; community development; and climate change. The types of effects include destruction or possible disturbance of undocumented cultural resources, added noise and visual effects on cultural resources and traditional use areas, and fragmentation of culturally important areas by reducing access and by changes in local resource availability.

Because of the potential of many undocumented cultural resources on the North Slope, it is difficult to quantify the extent to which they have been affected by past and present activities. In general, early oil and gas exploration and seismic, military construction, community infrastructure projects on the North Slope had greater potential to affect cultural resources. This was due to the less stringent regulations and identification requirements than what are in place today. In the program area, for example, military construction of the DEW relay station south of Nuvagapak Point along Beaufort Lagoon occurred in an area of previous Inūpiat use; subsequent formerly used defense site cleanup disturbed human remains.

Proposed and current activities that could affect cultural resources are the additional or continued development of onshore and offshore oil and gas resources. Other reasonably foreseeable activities that introduce impacts are from additional infrastructure projects, such as environmental and scientific research and surveys, recreation and tourism in the region, and new permanent and seasonal roads, airport improvements, and community infrastructure improvements through the ASTAR program.

Today, local, state, and federal regulations provide for stricter identification requirements that diminish the chances for direct impacts on cultural resources from projects like those mentioned above. In most instances, avoidance policies are implemented around documented cultural resource sites, particularly those that are eligible for listing on the NRHP; however, the potential for impacts, particularly for undocumented cultural resource sites, increases with oil and gas exploration, development, and production, with onshore and offshore transportation and infrastructure projects, increased recreation and tourism, scientific research, and community development.

Indirect impacts can occur, are less easy to avoid or mitigate, and could have substantial consequences to cultural resources. Such potential impacts are as follows:

- Decreased or increased access
- Potential removal, trampling, or dislocation of cultural resources and culturally sensitive areas by personnel and visitors
- Complete or partial destruction of a site from erosion, thawing permafrost, and thermokarsting
- Loss of traditional meaning, identity, association, or importance of a resource
- Effects on beliefs and traditional religious practices
- Neglect of a resource that causes its deterioration

The updated Nuiqsut Paisan̄ich (SRB&A 2018a) documented an example of indirect effects on traditionally used fish camps near Nuiqsut. Although the site is physically intact, Nuiqsut families, since the early 2000s, have not used the fish camps at the traditional *Nanuq* site. Reasons for the abandonment are development of the Alpine oil fields, resulting changes in caribou migration, and an increase in dust from development that prohibits fish drying, due to dust settling on the fish racks (SRB&A 2018a).

Others attribute the abandonment to decreasing water levels that led to reduced fishing success, possibly an indicator of climate change-induced effects. The effects of climate change, described under *Affected Environment (Appendix B)*, introduce cumulative impacts that could influence the rate or degree of the potential cumulative impacts. In general, the effects of climate change, while not uniform across the North Slope, are adverse, in that they hasten the disturbance or eventual destruction of cultural resource sites through erosion or thawing permafrost leading to decreased preservation or by exacerbating the effects of thermokarsting, cryoturbation, and solifluction.

Other examples of indirect effects, such as unauthorized artifact collection, have been recently identified as potential causes for the lack of formal and culturally diagnostic artifacts near the Toolik Lake Research Natural Area on the North Slope. Here there has been an increase in research activities, hunters, and recreationists since the 1970s (SRB&A 2019a). Infrastructure projects, such as those implemented through ASTAR, could result in greater public access to cultural resources in the program area, thus resulting in even greater potential for unauthorized collection or inadvertent disturbance of sites.

Cumulative impacts would have the greatest effect on ethnographic resources, such as TCPs and cultural landscapes. Compared to specific sites, impacts there are not as easy to avoid and mitigate because their significance is tied to historic and present cultural identity. These could be affected by the presence of development. This cultural identity relates to the cultural importance of the land and its surrounding natural resources, such as the Gwich'in and *Iizhik Gwats'an Gwandaii Goodlit*.

For these reasons, the action alternatives, in combination with other oil and gas exploration and other proposed development or recreation activities on the North Slope, have the potential to create cumulative effects on

cultural resources. Alternatives that allow the greatest amount of land to be developed are likely to have the greatest cumulative effect on cultural resources. This is because they could affect a greater number of documented and undocumented cultural resources; thus, Alternative B would have the largest contribution to cumulative effects on cultural resources, while of the action alternatives, Alternative D2 would have the smallest contribution to cumulative effects on cultural resources.

3.4.3 Subsistence Uses and Resources

Direct and Indirect Impacts

This section identifies potential subsistence impacts on Iñupiat and Alaska Gwich'in subsistence uses and species; Inuvialuit and Canadian Gwich'in subsistence impacts are discussed under *Transboundary Impacts* at the end of this section.

Issuance of oil and gas leases under the directives of Section 20001I(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on subsistence uses and species from on-the-ground activities.

Included in the discussion below are potential impacts on user access (resulting from legal or physical barriers), resource availability (resulting from changes in resource migration, distribution, or health), and resource abundance (resulting from overall population changes), which, following the BLM Alaska guidance (Instruction Memorandum No. AK-2011-008), are the three impact categories that must be addressed to inform the ANILCA Section 810 preliminary evaluation (see **Appendix F**). Common types of direct and indirect effects associated with oil and gas development in the program area include changes in subsistence use areas, harvest success, harvest amounts, participation, costs and time, competition, culture, and access (both physical and legal barriers and user avoidance). The hypothetical development scenario is used to inform the analysis of impacts for each alternative, but future analyses would occur with project-specific proposals. The effects of climate change, described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, no oil and gas leasing would take place in the program area, so subsistence uses among the Iñupiat and Gwich'in would be unaffected by oil and gas development in the Coastal Plain. Existing impacts on subsistence would continue, including oil and gas development to the west of the program area, increased vessel traffic in the Beaufort Sea, infrastructure and transportation projects, environmental and biological changes affecting subsistence species, changes in land status, and hunting and fishing regulations.

Impacts Common to All Action Alternatives

This section discusses potential impacts on the subsistence uses and resources from exploration, development, production, and abandonment and reclamation that are common to all alternatives (see **Appendix C**). The primary factors that may result in impacts on subsistence species and uses are as follows:

- Noise, traffic, and human activity
- Infrastructure, including physical barriers

- Contamination
- Legal or regulatory barriers
- Increased employment or income/revenue
- General development and associated cultural impacts

These factors could affect resource availability, resource abundance, and user access for residents of the study communities. Short term, or lasting less than 5 years, does not necessarily reflect the level of impact on subsistence uses; an impact lasting 4 years, for example, could have a large effect on subsistence uses.

In all cases, future development would affect subsistence uses of species of major importance for the subsistence study communities (see **Tables N-6, N-11, and N-19** in **Appendix N**). As described in *Affected Environment* (**Appendix B**), Kaktovik is the primary user of the program area and would therefore be most likely to experience direct impacts associated with development. Nuiqsut could experience potential direct and indirect impacts on harvesting marine mammals, such as bowhead whale, and indirect impacts associated with the harvests of caribou, waterfowl, and fish, all of which are resources of major importance to the community (**Table N-11**). Arctic Village, Venetie, and other communities that use the Porcupine Caribou Herd and Central Arctic Herd herds, have the potential to experience indirect impacts associated with caribou and, to a lesser extent, waterfowl. Caribou and geese both are resources of major importance to Venetie. While data to calculate resources of importance for Arctic Village are not available (see **Appendix N**), Arctic Village residents report birds as a key subsistence resource (Native Village of Venetie Tribal Government, Arctic Village Council, and Venetie Village Council 2018).

In the case of the 22 Alaskan caribou study communities and seven Canadian user groups (**Table N-20** and **N-21** in **Appendix N**), those with a greater reliance on caribou would be more likely to experience potential indirect impacts related to caribou abundance or availability. Alaskan communities with the greatest reliance, that is those where caribou accounts for greater than 10 percent of the annual subsistence harvest, on average, and over 50 percent of households use the species, are Alatna, Anaktuvuk Pass, Utqiagvik, Bettles, Coldfoot, Eagle, Kaktovik, Nuiqsut, Point Lay, Venetie, Wainwright, and Wiseman. In Allakaket, Atqasuk, and Evansville, caribou accounts for less than 10 percent (or data are not available), but over 50 percent of households use caribou (**Table N-20** in **Appendix N**). In addition, as noted under *Subsistence Uses of the Central Arctic Herd and Porcupine Caribou Herd* (**Appendix B**), approximately 85 percent of the Porcupine Caribou Herd harvest occurs in Canada; the NWT Gwich'in, Vuntut Gwich'in, and Inuvialuit are the primary Canadian users in terms of number harvested (**Figure 3-7** in **Appendix A**).

Potential impacts, particularly those relating to changes in calving distribution and calf survival, are expected to be more intense for the Porcupine Caribou Herd because of their lack of previous exposure to oil field development (see **Section 3.3.4**). Among Alaskan communities, Kaktovik, Arctic Village, Venetie, and Eagle are in GMU subunits overlapping the Porcupine Caribou Herd and have a high reliance on caribou; however, a portion of Eagle harvests likely come from the Fortymile Caribou Herd; therefore, caribou study communities most likely to experience impacts from the leasing program include the communities of Kaktovik, Arctic Village and Venetie (ADFG 2018b). Compared with these three Alaskan communities, uses of Porcupine Caribou Herd caribou (in terms of number harvested) by the NWT Gwich'in, Vuntut Gwich'in, and Inuvialuit user groups are comparable or higher, and communities associated with these user groups—Old Crow, Aklavik, and Fort McPherson—are in the Porcupine Caribou Herd range (**Map 3-46** in **Appendix A**); thus, these Canadian communities would be among the most likely to experience potential indirect impacts due to their proximity to and reliance on the Porcupine Caribou Herd. As noted above, many Alaskan Gwich'in communities have a cultural and spiritual connection to the Arctic Refuge and, despite being on the

periphery of the current Porcupine Caribou Herd range, participate in sharing networks with Arctic Village and Venetie, often centered on exchanges of caribou. Thus, while the Gwich'in communities of Arctic Village and Venetie are most likely to experience impacts related changes in species availability and abundance, other Gwich'in communities could also experience substantial impacts related to a decline in sharing and perceived degradation of culturally important lands.

The following sections identify potential subsistence impacts on Iñupiat and Alaska Gwich'in subsistence uses and species; Inuvialuit and Canadian Gwich'in subsistence impacts are discussed under a separate heading *Transboundary Impacts* at the end of this section.

Noise, Traffic, and Human Activity

Noise, traffic, and human activity associated with oil and gas activities would result from construction, gravel mining, air, vessel, and ground traffic, seismic activity, drilling, and human presence. Noise, traffic (both ground and air), and human activity can cause both direct and indirect impacts on subsistence users.

In general, activity levels and associated noise and traffic would be greatest during the development phases of projects and would be at lower levels during the exploration, production, and abandonment and reclamation phases. Certain types of impact sources, such as construction and seismic noise and associated smells, would be most likely to occur during the exploration and development phases.

3D seismic exploration is expected to occur within three years of lease sale and would be used to locate and delineate exploration wells in addition to mapping construction resources and coastal area for barge landing and marine infrastructure locations. Noise, traffic, and human activity would be local and long term. Impacts related to noise and traffic have been a primary concern reported by subsistence harvesters on the North Slope and elsewhere. Noise and traffic associated with the leasing program could potentially affect the availability of subsistence species, such as caribou, marine mammals, furbearers, and small land mammals, fish, and migratory birds. While most impacts related to noise and traffic would be local, occurring in areas where Kaktovik subsistence use areas overlap with action areas, certain impacts, particularly those related to caribou migration, could extend outside the program area and would be regional. Even small changes in species migration or distribution, from a biological perspective, can have larger impacts on subsistence users if resources are not in traditional use areas at expected times of the year.

According to traditional knowledge of North Slope Iñupiat, furbearers, caribou, waterfowl, and marine mammals are sensitive to noise and human activity (SRB&A 2017b, 2009a). Animals may also react negatively to smells introduced through seismic exploration and development (see Contamination, below). Potential impacts on caribou availability include displacement of caribou from areas of heavy oil and gas activity, diversion of caribou from their usual migratory routes, and skittish behavior, which results in reduced harvest opportunities (SRB&A 2017b).

Air traffic—particularly helicopter traffic—has been the most commonly reported impact on caribou hunting by Nuiqsut harvesters since the Nuiqsut Caribou Subsistence Monitoring Project began in 2009. Residents note that air traffic can cause skittish behavior in caribou, either causing them to stay inland from riversides or diverting them from their usual migration and crossing routes (see **Section 3.3.4**); such potential impacts could occur for Kaktovik harvesters as they travel along the coast by boat or inland by snowmachine looking for caribou. Ground traffic has also been observed diverting or delaying caribou movement across roads, and biological research have shown caribou, especially cows with calves, avoiding roads and other areas of human activity, particularly where traffic levels are high (see **Section 3.3.4**).

These impacts would be most likely during the peak of the caribou hunting season for Kaktovik, in July and August (SRB&A 2010). Porcupine Caribou Herd use of the program area during July and August varies annually; while most Porcupine Caribou Herd had left the Coastal Plain by the end of June from 2000 to 2014, Porcupine Caribou Herd stayed in the program area later in the summer between 2015 and 2018. The Central Arctic Herd routinely moves through the program area during the July and August insect season; therefore, impacts on species availability for Kaktovik hunters may be more likely for that herd in some years (**Section 3.3.4**). Deflection of caribou and delayed crossings are most common when traffic levels are at 15 vehicles per hour or more, particularly where both pipelines and roads are present. Displacement is less common during the insect harassment period, when caribou are highly motivated to access insect relief areas (**Section 3.3.4**).

These responses may be more likely for Porcupine Caribou Herd caribou, as they have had less exposure to development than the Central Arctic Herd. If development causes large-scale displacement from Porcupine Caribou Herd calving grounds, then the herd could experience a decline in calf survival and stagnant herd growth. In addition to large land mammals, furbearers, such as wolf and wolverine, may avoid areas of heavy traffic, drilling noise, seismic testing, and other activity. Lease Stipulation 9 and ROPs 36, 37, 39, and 41 associated with subsistence consultation for permitted activities, would require consultation with potentially affected communities regarding the timing, siting, and methods of development, including seismic activities.

Few caribou use the program area during winter, so impacts on Porcupine Caribou Herd from seismic activities would be minimal; however, those caribou that are present during that time are an important subsistence species to Kaktovik hunters. ROP 34 places restrictions on the timing, location, and altitude of aircraft, in addition to requiring consultation with subsistence users, which would help reduce air traffic-related impacts.

Impacts on marine mammals from noise and traffic have also been reported by whaling crews and marine mammal hunters in Kaktovik and Nuiqsut (SRB&A 2009a); biological science also shows that marine mammals are sensitive to such disturbance. As noted in the *Affected Environment* discussion (**Appendix B**), Kaktovik whaling crews and seal hunters hunt offshore from the program area, and Nuiqsut whaling crews hunt to the west of the program area from Cross Island, sometimes hunting in areas offshore from the program area. In addition, Kaktovik residents hunt ringed and bearded seals along the coast and offshore from the entirety of the program area, with peak hunting July to September.

Whaling crews have reported skittish behavior in bowhead whales and other marine mammals during times of heavy air and vessel traffic and seismic exploration. Such activity can divert bowhead whales farther from shore or cause unpredictable behaviors, resulting in greater risks to hunter safety (SRB&A 2009a; Galginaitis 2014). If CAAs between industry and the Alaska Eskimo Whaling Commission continue in relation to the proposed oil and gas leasing program and barging activities, then impacts on whaling from the leasing program are unlikely; however, not all vessel traffic, such as that from barging not associated with oil and gas development, is subject to CAAs, so impacts from shipping and other activity could occur even with a CAA in place. An average of two barge transports per year are anticipated, depending on the development phase, a barge landing would be developed in the Coastal Plain.

CAAs are generally considered an effective measure by whaling crews, industry, and agencies (SRB&A 2013b). They would apply to the whaling season and would not occur for the entirety of the marine mammal hunting season, which, in Kaktovik, is primarily from July through September; thus program-related barge and vessel traffic may disrupt seal hunting outside the primary whaling season due to skittish behavior in the vicinity of vessels. In addition, underwater noise from icebreaking vessels has also been shown to cause avoidance behaviors in ringed and bearded seals and to temporarily reduce ice-breeding habitat.

Lease Stipulation 4 and ROP 46 provides a number of requirements and restrictions to marine vessel traffic and associated activities when in the vicinity of whales, walrus, polar bears, and seals in addition to restrictions near important habitat areas. It also would help reduce potential conflicts with subsistence users, species, and offshore activities. ROP 4 and Lease Stipulation 14 are directed at minimizing potential conflicts related to polar bears, including several requirements, including monitoring requirements, and standards aimed at protecting polar bear dens and subsistence uses of polar bears.

While most marine mammals are hunted in the summer, seismic exploration could affect March and April seal hunting along the coast. If STPs occur in areas of high use and overlap seal hunting, then residents may experience reduced success in those areas. This is because associated noise and activity may result in more widespread displacement during STP operation.

Overall, because most development would be land based and because of the existence of CAAs to reduce potential impacts associated with barging, impacts on marine mammal availability may occur in isolated instances for individual hunters; however, they are not expected to occur for the community as a whole.

Noise and traffic associated with future oil and gas development would also potentially disturb subsistence resources such as birds and fish, and could cause temporary reductions in harvesting success for Kaktovik harvesters; however, most displacement would be temporary and would not change the overall population levels (**Section 3.3.2** and **Section 3.3.3**).

Noise; human presence and activity; and ground, vessel, and air traffic associated with development of the program area may cause temporary disturbances to or displacement of waterfowl, causing temporary and localized changes to harvester success for individual hunters (**Section 3.3.3**). Displacement from road traffic may occur within 0.8 miles of active roads, and displacement from air traffic may range from 1.2 and 2.5 miles, depending on the type and altitude of the aircraft (**Section 3.3.3**). Transport of modules to Camden Bay would also disturb and displace birds, such as eiders and long-tailed ducks, in the nearshore environment. Human activity is the most consistently strong disturbance source in Prudhoe Bay (**Section 3.3.3**), and similar disturbances within the program area would likely occur and cause displacement of birds from nests for the duration of human activity.

Noise and exploration from vehicle traffic associated with seismic surveys could alter flows, thus blocking fish passage. In addition, underwater shock waves could disturb, injure, or kill fish in winter (**Section 3.3.2**). During winter, Kaktovik residents fish through the ice at inland locations, including First, Second, and Third Fish Holes on the Hulahula River, in addition to locations on the Kongakut, Sagavanirktok, and Shaviovik Rivers and Schrader Lake. Depending on the location of seismic surveys, these individuals could experience decreased fishing success from seismic activities, as has been reported in other communities (SRB&A 2009).

Air traffic and ground traffic and human activity near gravel roads and pads could displace geese and affect spring geese hunters. Spring geese hunting could also be affected if ice road or seismic activity continues into May. Summer eider hunting could be affected by barge traffic, although disturbances to eiders from vessel traffic would likely be temporary and local. Impacts to harvests of migratory birds within Gwich'in territory resulting from changes in abundance or migration would be most likely to occur as the birds migrate from the program area to Gwich'in territory in the fall months. If particularly disruptive fall development activities result in premature or later migratory patterns for some birds, then Gwich'in hunters may experience reduced hunting success. Disturbances to birds and fish have been reported by Nuiqsut harvesters as a result of the Alpine Satellite Development Plan and other developments; however, such disturbances have not resulted in overall reductions in harvests of these subsistence foods over time (SRB&A 2009a) (see **Section N.2** in

Appendix N). ROPs 14 and 16 would address some disturbances to fish habitat from seismic activity and exploratory drilling.

The above impacts on species availability may be considered localized from a biological standpoint; however, small, localized changes can have larger impacts on subsistence harvesters when wildlife is not present in traditional hunting areas at the expected times and in adequate abundance. Residents may experience reduced harvest success, increased costs and time, and increased safety risks if species are less available.

While potential impacts on species availability related to noise and traffic are most likely to be local in extent, such as for Kaktovik or Nuiqsut residents who use the program area, more widespread changes in migration or abundance resulting from noise and traffic and infrastructure (see discussion below) could cause regional impacts extending outside the program area to other communities, such as the Gwich'in communities of Arctic Village and Venetie and the Gwich'in and Inuvialuit user groups in Canada. Residents of these communities harvest primarily from the Porcupine Caribou Herd (see **Table N-21** in **Appendix N**).

Activities during the summer that may affect caribou distribution or migration are helicopter and plane flights and ground traffic along gravel roads. Combined with impacts of infrastructure (see below), this could affect the timing or location of Porcupine Caribou Herd caribou arrival into Gwich'in hunting areas to the south of the Arctic Refuge during the peak fall hunting season (August to October). The Nuiqsut, Kaktovik, and Anaktuvuk Pass harvesters of the Central Arctic Herd could also be affected by disruptions to this herd, although the project affects a smaller portion of the herd's overall range.

Reduced harvests of caribou by residents from Kaktovik, Nuiqsut, Arctic Village, or Venetie could disrupt existing sharing networks to other communities and regions if residents are unable to share as widely or frequently as they are accustomed to.

In addition to affecting species availability, future noise, traffic, and human activity may also affect user access by deterring subsistence users from their usual harvesting areas. Avoidance of subsistence use areas due to development has been documented in Nuiqsut (SRB&A 2017a) and would likely occur for some Kaktovik harvesters if development occurs in their harvesting area. Residents may experience discomfort hunting in the presence of outsiders; may avoid hunting near areas of high air or ground traffic because of a perceived or actual reduction in the availability of subsistence species; may avoid hunting near human activity due to safety concerns; or may consider noise pollution and increased human activity to degrade the subsistence experience.

Infrastructure

Infrastructure associated with exploration, development, and production could include future gravel and ice roads, pipelines, gravel pads, bridges, gravel mines, and runways. While most potential impacts related to infrastructure would be site-specific or local, occurring in and around action areas, certain impacts—particularly those related to caribou migration and abundance—could extend outside the program area and would be regional. Infrastructure impacts would be long term.

Infrastructure could cause loss of subsistence use areas due to direct overlap (**Map 3-63**, Kaktovik Subsistence Use Areas and Areas of Hydrocarbon Potential, in **Appendix A**). Much of the coastline in the area of high HCP shows high overlapping use by the community of Kaktovik for subsistence purposes, particularly for caribou, fish, and waterfowl (**Map 3-47**, **Map 3-51**, Kaktovik Fish Subsistence Use Areas in Coastal Plain, and **Map 3-52**, Kaktovik Bird Subsistence Use Areas in Coastal Plain, in **Appendix A**).

While actual infrastructure would be limited to a smaller proportion of the overall development area, areas excluded from subsistence use would likely be greater than the actual footprint, either due to avoidance or

security and firearm restrictions. In Nuiqsut, 43 percent of harvesters have avoided development activities or infrastructure at one time or another between 2013 and 2020 (SRB&A 2022). During individual study years, the number of respondents avoiding areas for development reasons has ranged from 23 to 47 percent. Avoidance of road areas may be less likely for Kaktovik, as roads may open access to hunting areas that are not currently accessible.

If future development extends into areas of medium and low potential for oil and gas development, as is expected, associated infrastructure could extend throughout areas of high overlapping use for the community of Kaktovik and could present a barrier (either perceived or actual) between the community and more highly used inland hunting areas for caribou, wolf/wolverine, moose, Dall sheep, and fish (**Map 3-47** through **Map 3-51** in **Appendix A**). Impacts to access would be particularly likely if infrastructure bisects areas of established community travel routes, which have been documented for Kaktovik along the Hulahula, Okpilak, Jago, and Sadlerochit rivers to inland areas where residents engage in key subsistence activities (SRB&A 2010).

Infrastructure would pose physical obstructions to subsistence users if roads and pipelines are not designed to account for overland hunter travel, or if bridges and causeways obstruct travel along rivers or coastlines. Some residents in Nuiqsut have reported difficulty safely crossing certain gravel roads with snowmachines or four-wheel vehicles due to the steep side slopes (SRB&A 2017a). However, in recent years improvements to the road system such as ramp upgrades and the establishment of subsistence pullouts have lessened these impacts (SRB&A 2022).

Kaktovik hunters frequently travel by boat to the west and east of the community, searching for caribou as they congregate along the coast during the insect relief season. Pipelines in coastal areas could cause physical obstructions for these individuals; residents may be unable to shoot inland or may have to expend extra effort accessing suitable use areas if pipelines are situated too close to the coast. As noted in USACE 2012, such impacts would be particularly likely if pipelines are within 1 or 2 miles of the coast. Increased use of roads or changes in travel routes due to the presence of infrastructure could increase the likelihood of injuries and accidents for Kaktovik harvesters (see **Section 3.4.11**). ROPs 18, 20, 21 and 23 would minimize potential direct obstructions to subsistence uses from infrastructure, with ROP 18 requiring consultation with Tribal Governments regarding road design and construction; however, impacts on access may still occur due to some harvesters avoiding industry.

If Kaktovik residents have easy access to roads associated with the oil and gas leasing program, it is likely that some would use the roads to access subsistence harvesting areas, when overland snowmachine travel is difficult and for residents who do not have access to overland modes of travel, such as snowmachines and four-wheel vehicles. Use of these roads would be less likely or frequent if the roads are not connected to the community of Kaktovik or are connected only seasonally via ice roads.

The use of future program roads for subsistence activities can introduce benefits to subsistence users; examples are facilitating access to areas at times when access is difficult, providing access for community residents who do not own snowmachines, four-wheelers, or boats, and allowing residents to access subsistence wildlife when they are unavailable closer to the community. Because Kaktovik residents have limited access in the program area, road access would open areas that are generally not accessible to them.

The community of Nuiqsut provides a recent example of the impacts and benefits of increased road access. Since 2016, the community has had access to roads connecting the community to several oil field developments (including CD5, GMT-1, and GMT-2). Residents of the community have increasingly used

these roads to hunt caribou and access use areas for other subsistence foods such as geese and berries. Notably, these roads are off-limits to non-locals (aside from oil-field workers and contractors). A recent household survey showed 72 percent of households using the road system to hunt caribou in 2020, with nearly half of households citing “ease of access” and others citing a lack of access to other non-road modes of transportation (e.g., boats) or the availability of caribou along the road (SRB&A 2022). Those households who did not use the road to hunt caribou indicated that they preferred hunting with other modes of transportation or cited industry avoidance or personal preference for not using roads. The percentage of caribou harvested in the area west of Nuiqsut has increased since the introduction of roads into that area.

Many residents view road access as a benefit to the community which facilitates their hunting activities. However, a number of residents have also reported deflection along the road system, which necessitates their use of the road to access the caribou herds which are farther west of the community. In addition, hunting activity along the road corridor has been reported to deflect caribou away from the area west of the community where hunters have traditionally traveled using overland vehicles (e.g., snowmachines and ATVs) (SRB&A 2021). Recent caribou monitoring data suggest that caribou may hesitate to cross the road, or follow the road corridor for a period of time instead of crossing it (Welch, Prichard, and Macander 2022). However, because the road is on the periphery of the herd’s migratory range, it is unclear whether these movement patterns are due to the road itself or due to the herd following natural corridors (e.g., Fish Creek).

If roads, such as the Dalton Highway, connect to the road system and facilitate access by non-local hunters, then residents could experience increased competition from outsiders hunting in traditional subsistence use areas. Other industrial roads on the North Slope (e.g., Kuparuk and Alpine roads) have remained closed to public access, and therefore the likelihood of roads in the program area becoming open to the public in the near-term is relatively low. ROP 38 would prohibit hunting, trapping, and fishing by lessees, operators, and contractors when persons are on work status; however, this would not apply once workers’ shifts end and they return to a public airport or community, such as Kaktovik or Deadhorse. Similar rules are in place elsewhere on the North Slope (e.g., Nuiqsut area) and have not resulted in issues associated with workers returning to the area to hunt.

Similar to noise, traffic, and human activity, infrastructure could also affect the availability of certain species through changes in abundance, migration/distribution, and behavior. Infrastructure would be most likely to affect migratory terrestrial species, particularly caribou, but could also affect furbearers, waterfowl, and fish. Infrastructure could divert or impede caribou movement, displace waterfowl from nesting and other habitat, and displace fish from nearshore or riverine habitats, at least temporarily.

Studies on the North Slope show that caribou distribution, especially cows with calves, changes around transportation corridors, and that a percentage of caribou (approximately 30 percent) are influenced in their movement by the presence of roads (NRC 2003; Wilson et al. 2016). Caribou have been observed to avoid roads and pads at distances up to 3.11 miles at North Slope oil fields, and similar displacement levels would be expected in the program area; however, the potential for hunting along road corridors, particularly if hunters travel overland from the road system with ATVs or snowmachines, may result in greater displacement distances (**Section 3.3.4**). While avoidance of roads and pads is strongest during the calving season, displacement within 1.2 miles has been observed during the post-calving season as well (**Section 3.3.4**, Seversen et al. 2023, Johnson et al. 2020). Porcupine Caribou Herd caribou have had less exposure to development infrastructure and therefore may exhibit stronger avoidance behaviors than Central Arctic Herd caribou. In the 1980s, deflections of approximately 20 miles were observed in Central Arctic Herd caribou with little exposure to development (**Section 3.3.4**, Smith and Cameron 1985).

Future development in the areas of high, medium, and low oil and gas potential could present obstacles to caribou migrating from inland areas to the coast, where Kaktovik residents have traditionally hunted them during the summer (SRB&A 2010). It has been noted that in recent years caribou have been remaining inland and not venturing to the coast; the lack of caribou along the coast, in combination with restrictions on off-road vehicle (i.e., ATV) access for Kaktovik residents into the Arctic Refuge, has resulted in caribou not being available to residents (see **Appendix N**). While infrastructure is not expected to divert caribou migration altogether, linear features occurring perpendicular to migratory routes could slow caribou movement through the area, further reducing their availability to hunters along the coast (NRC 2003; Wilson et al. 2016) (see **Section 3.3.4**). Road avoidance is particularly likely during times of high human activity, including ground vehicle use.

In addition, pipelines have been shown to influence caribou movements when they are parallel to mosquito relief movements, which could affect caribou crossing toward the coast and hunter success. The Porcupine Caribou Herd has had much less exposure to development and infrastructure than the Central Arctic Herd, although Porcupine Caribou Herd animals may encounter the Dempster Highway, which is in the Porcupine Caribou Herd range in Canada and used to access hunting areas. While areas of avoidance for the Porcupine Caribou Herd are larger than those reported for the Central Arctic Herd (**Section 3.3.4**), recent studies do not support the theory that caribou habituate to industrial infrastructure over time (Johnson, Golden, Adams, Gustine, and Lenart 2020).

In addition to causing physical obstructions to hunters and animals, oil and gas related infrastructure would also cause visual disturbances. As noted in **Section 3.4.8**, Visual Resources, most existing infrastructure in the program area, including Native allotments and associated cabins and structures, are small, made of local materials, and have natural coloring. Thus, these structures are in relative harmony with the environment. Oil and gas-related infrastructure is more likely to stand out on the landscape and cause visual disturbances, resulting in changes in species distribution and movement or avoidance by hunters. Visual disturbances may also cause residents to perceive the natural character of the landscape to be degraded, negatively affecting subsistence users' experience on the land.

Future oil and gas infrastructure in the program area is expected to result in long-term loss and alteration of bird habitat. Alteration of waterfowl habitat may occur as a result of winter seismic exploration, water withdrawals for ice roads and ice pads, contaminant spills, gravel mining, open water dredging, and ice and gravel placement. Placement of gravel for roads and pads would remove waterfowl habitat in the long-term, and dust deposition and drifted snow along gravel roads would further alter or reduce the quality of bird habitat. However, these changes are not expected to cause overall changes in bird populations (**Section 3.3.3**). Infrastructure could affect fish habitat by causing habitat loss, increased turbidity from dust and gravel spray, reduced fish passage, and reduced water quantity (**Section 3.3.2**).

According to **Section 3.3.4**, future oil and gas infrastructure in the program area, particularly in the Porcupine Caribou Herd calving grounds, could cause a shift in calving distribution during some years, which would likely reduce calf survival and halt herd growth. Calving grounds vary annually based on spring weather conditions and available vegetation. As discussed in **Section 3.3.4**, it is important that the Porcupine Caribou Herd have a large area from which to select calving grounds each year (Tr'ondek Hwech'in 2024). To the extent that calving grounds are disturbed by oil and gas development, Porcupine Caribou Herd calf survival and herd numbers could be reduced. One analysis estimated that the decline in calf survival from unconstrained development of the program area would be 10 percent (**Section 3.3.4**). The Porcupine Caribou Herd may be more vulnerable to population impacts than the Central Arctic Herd reasons, including lower

population growth rates and productivity, a higher dependence on summer forage, higher calving density, and fewer suitable alternatives for calving grounds. An overall reduction in the Porcupine Caribou Herd could affect harvest success among Iñupiat, the Gwich'in, and Inuvialuit caribou hunters.

According to the Gwich'in's knowledge, any development in the program area would have devastating effects on the population of the Porcupine Caribou Herd and other resources, such as migratory birds, which have key habitat in the coastal plain. In addition, there are those among the Iñupiat who report similar knowledge regarding the effects of ACP development (BLM 2018c, 2018d, 2018e, 2018f). These concerns are based on Alaska Native observations of the sensitivity of resources to development and change, in addition to traditional knowledge that has been passed on through generations. See **Appendix D** for additional information.

Contamination

Contamination (whether documented as exceeding regulatory or food safety thresholds or not) or the fear of contamination, including contamination from oil spills, fugitive dust, transport of waste and hazardous materials, erosion, and air pollution, could affect species availability and user access. If an oil spill causes reduced abundance or reduced health of certain species, then they could become less available to the subsistence users. Contamination could occur during the exploration, development, production, and abandonment and reclamation phases. Depending on the nature of the contamination, it would be site-specific or local and either short or long term. If migratory species are affected, contamination impacts could extend to a regional level.

Dust deposition from gravel infrastructure, ground traffic, and construction could affect fish habitat in the long term (**Section 3.3.2**), thus affecting the availability of fish in certain traditional harvesting areas, such as along the Hulahula River, for Kaktovik harvesters. In addition, depending on the location of STPs, discharging brine into coastal waters could affect salinity, thus affecting the availability of fish for Kaktovik harvesters in certain coastal locations (**Section 3.3.2**). The most common type of spill throughout any development would be accidental fuel spills during seismic exploration (**Section 3.3.2**). Cumulatively, frequent small spills near subsistence fish harvesting areas could reduce fish (e.g., Dolly Varden) availability along waterways, or cause harvesters to avoid certain areas of high seismic activity or areas where spills are known to have occurred. Vegetation harvests may be affected by dust deposition along roads, and caribou and birds may also ingest contaminated vegetation in the event of small-scale spills along roadways (**Section 3.3.1** and **Section 3.3.4**). Vegetation, particularly wild plants, are used by residents both for their nutritional value and for medicinal purposes. Potential impacts on subsistence wildlife from oil spills would occur for marine and riverine wildlife such as fish, seals, and bowhead whales, in addition to bird and terrestrial species that frequent riverine, marine, and wetland areas. Oil spills increase risks of injury or death to birds and their eggs (**Section 3.3.3**). Small spills in the program area or air contamination could also cause subsistence users to avoid harvesting certain species, particularly near development areas, while larger-scale oil spills could cause larger areas of avoidance. This could have potential indirect effects on human health, including mental and spiritual health, through reduced consumption of nutritional foods (**Section 3.4.11**) (Pufall, Jones, McEwen, Lyall, Peregrine, and Edge 2011). Studies have shown that pollution can have indirect impacts on Indigenous people's health by increasing reliance on Western foods, reducing participation in traditionally important activities, and causing a loss of traditional knowledge about subsistence harvesting and processing activities (Fernandez-Llamazares, Garteizogeoasca, Basu, Brondizio, Cabeza, Martinez-Alier, McElwee, and Reyes-Garcia 2019).

Impacts on fish availability would not likely extend beyond Kaktovik harvesting areas unless there is large-scale contamination. In this event, it is possible that the availability of Arctic cisco, which migrate past the program area on their way to the Colville River delta, could be affected for harvesters in Nuiqsut or in

Canadian communities farther east (see Transboundary Impacts, below). While unlikely, large spills on land could affect waterfowl nesting areas, destroy large numbers of birds (**Section 3.3.3**), and affect their availability to harvesters in other regions, such as those to the south of the program area.

In addition, vegetation harvesting areas would be affected, particularly if spills occur in coastal areas where Kaktovik harvesters have the most access during the summer. Finally, large-scale oil spills in open water, particularly during the summer, could have adverse effects on large numbers of marine mammals, thus affecting the availability of these animals to Kaktovik and Nuiqsut residents; however, the likelihood of this occurring is negligible (see **Section 3.3.5**). Potential impacts from contamination are most likely to occur for Kaktovik residents and would be local; however, in the event of a large-scale oil spill in the marine or riverine environment or other contamination event, subsistence users who harvest resources that use or pass through the development area—such as those from Nuiqsut, Arctic Village, and Venetie—may also experience reduced availability. This would be due to physical contamination or avoidance of species from the perception that subsistence species are contaminated; thus, impacts related to contamination would be of local to regional context. Monitoring air quality and contaminants in subsistence foods (ROPs 6 and 7) and comprehensive waste management plans (ROP 2) would help address subsistence user concerns related to contaminants and would help to identify potential human health issues.

Animals may also react to changes in smells across the landscape, including on the land, in water, and in the air. Animals use odor to determine where they go and to select feeding grounds and water sources (Finnerty et al. 2022 Nielsen, Jezierski, Bolhuis, Amo, Rosell, Oostindjer, Christensen, McKeegan, Wells, and Hepper 2015)). Thus, changes in smells resulting from oil spills, introduction of new materials, and different types of emissions, could affect species distribution and behavior, thus reducing their availability within traditional harvesting areas.

While a large-scale oil spill associated with oil and gas development in the program area is considered unlikely, smaller contamination events may contribute over time to the perception that species in the program area are contaminated or unsafe to eat. This may cause residents who use the program area to avoid them (Kaktovik and Nuiqsut). Subsistence users also might avoid consuming caribou, marine mammals, and waterfowl that migrate through the program area and are harvested elsewhere. Examples are the residents of Arctic Village, Venetie, and other Gwich'in and other Canadian Inuvialuit communities. Indigenous residents have also reported changes in the taste and quality of certain subsistence foods, including caribou, waterfowl, and fish, after exposure to development and other sources of pollutants (Native Village of Venetie Tribal Government, Venetie Village Council, and Arctic Village Council 2023).

Avoiding subsistence foods due to contamination concerns is well documented. In a recent study on the North Slope, around half of community households in Nuiqsut and Kaktovik reported having avoided eating certain subsistence foods during the previous year, due to concerns that they were contaminated (SRB&A 2017a).

Legal or Regulatory Barriers

There would be legal or regulatory barriers, including restrictions on access and firearm discharge near oil and gas facilities, during the exploration, development, and production phases that reduce user access and subsistence species availability in traditional use areas. Associated impacts would be site-specific or local and long term or short term, depending on the nature of the barrier, for example a pipeline or road versus temporary construction activity. Hunters would likely be subject to certain restrictions regarding discharging firearms near pipelines, roads, and other facilities. Depending on the parameters of such restrictions, such as the distance at which a firearm can be discharged, subsistence users may potentially have difficulty hunting in certain areas, particularly where pipelines or roads parallel the coast.

Miscommunication surrounding rules and restrictions around future oil and gas facilities, as has been documented in the case of Nuiqsut (SRB&A 2017a), may dissuade residents from accessing development areas. Impacts related to legal or regulatory barriers are most likely to occur for Kaktovik and would be of local extent; however, whaling crews from Nuiqsut could experience impacts when hunting offshore of the program area. Lease Stipulation 11 would require consultation with the community of Kaktovik to develop a subsistence 3-212 access plan.

Employment and Revenue

Increased employment and revenue related to future oil and gas development could have potential beneficial and adverse impacts on subsistence uses in affected communities during the exploration, development, and production phases. Employment and revenue impacts could be regional and long term. Increased income from employment and corporation dividends would likely be put to use in supporting subsistence activities through the purchase of faster and more efficient equipment and technologies and through supporting super-harvester households¹³ in the community. Increased income from dividends and employment will not be equally shared among communities and community residents due to differences in shareholder status and ability to work.

Data on Kaktovik and Venetie show that community engagement in subsistence activities has remained strong, alongside significant social and economic changes over the past several decades, such as higher household incomes (Kofinas et al. 2016). Despite the relative persistence of subsistence harvesting, data also show a relatively high percentage of households that report low food security (40 percent in Kaktovik and 34 percent in Venetie), which showed no correlation with household income or harvest levels. In terms of harvest and income levels, there is a great diversity among village households, from high income/high harvest to low income/low harvest. These households show different levels of social connections, such as sharing ties, depending on harvest and income levels; thus, certain households may be less able to adapt to changing conditions and may be more vulnerable than others (Kofinas et al. 2016). Social connections are an important mitigation in the absence of household assets, such as income and harvest equipment, through sharing and cooperation; disruption of social connections could thus increase vulnerability in communities.

A potential increase in employment could cause a shift in subsistence roles in the community, as employed individuals may have less time to engage in subsistence activities (see **Section 3.4.4**). These potential impacts would be most likely to occur for Kaktovik (see **Section 3.4.10**), which is most likely among North Slope villages to see an increase in employment and income from the proposed oil and gas leasing program; however, increased income resulting from ANCSA corporation dividends could extend throughout the North Slope and would therefore be of regional context. It is unclear the extent to which Kaktovik and other North Slope residents would participate in oil and gas-related employment. As noted in **Section 3.4.10**, 0.2 percent of oil and gas jobs on the North Slope in 2022 were held by NSB residents.

General Development and Culture

Overall, future development in the program area could have lasting effects on cultural practices, values, and beliefs through its impacts on subsistence. The potential impacts of development could result in reduced harvests, changes in uses of traditional lands, and decreased community participation in subsistence harvesting, processing, sharing, and associated rituals and feasts. Because of this, communities could experience a loss of cultural and individual identity associated with subsistence, a loss of traditional knowledge about the land, damaged social and kinship ties, and effects on spirituality associated with degradation of the Alaska coastal plain. These are key concerns that were reported by the Iñupiat and Gwich'in

¹³Households with an abundance of able-bodied labor who are able to become the centers of subsistence production and distribution for a community.

during public scoping meetings associated with the oil and gas leasing program (BLM 2018c, 2018d, 2018e, 2018f). While most general development and cultural impacts would be long term and program area wide, certain impacts affecting migratory species such as caribou could extend regionally.

For the Gwich'in, who view the Arctic Refuge as sacred ground, or "The Place Where Life Begins," the mere presence of oil and gas infrastructure within the program area will constitute a cultural and spiritual impact to their people (see **Section 3.4.2**). The Gwich'in believe that any development in the Arctic Refuge will cause irreparable harm to the calving grounds of the Porcupine Caribou Herd, as well as the habitat (e.g., feeding, nesting) of other migratory species which are later harvested by the Gwich'in (e.g., migratory birds). Caribou in particular have spiritual importance to the Gwich'in, who refer to themselves as the "Caribou People" and whose primary cultural tradition is living in reciprocal harmony with caribou (see **Section 3.4.4**). Many Gwich'in believe that it is their cultural and spiritual obligation to protect the Porcupine Caribou Herd. Thus, any impacts on the Porcupine Caribou Herd will have cultural and spiritual impacts on the Gwich'in people, and these impacts would be adverse, long-term and regional. As described in **Section B.4.2, Cultural Resources**, the Gwich'in have identified the Porcupine Caribou Herd Calving Grounds sacred site within the Coastal Plain.

Kofinas et al. (2016) analyzed different scenarios of change, including loss or shortfalls of harvestable foods, altered resource distribution/harvester access, increased costs associated with hunting, and employment, and the potential ramifications to village social and sharing networks. The study notes that households and communities are resilient to change, in large part because of the complex sharing networks that allow for some flexibility in household roles and annual harvests; however, larger disruptions to subsistence, such as a community-wide harvest shortfalls, could "have disproportionately negative community-wide effects on distribution as high harvesters redistribute more food on aggregate" (Kofinas et al. 2016).

Such effects could extend outside communities as well, particularly between communities with strong sharing ties, such as Arctic Village and Venetie. On a household level, Kofinas et al. (2016) suggest that certain households, such as those with fewer social connections and less income, are more vulnerable to changes in subsistence. This is because they have less adaptive capacity with which to weather reduced species availability or reduced income.

The various impacts on subsistence from development can weaken social cohesion over time through reduced participation in subsistence activities, including hunting, processing, and sharing. See **Section 3.4.4** for a discussion of potential effects related to social cohesion, and **Section 3.4.11** for a discussion of potential effects related to food insecurity. ROP 40 would require cultural training for oil and gas personnel on environmental, social, traditional, and cultural concerns. Proper education may reduce the potential for conflicts between subsistence users and visiting workers.

Alternative B

Under Alternative B, the types of potential impacts on subsistence uses and species would be the same as those described under *Impacts Common to All Action Alternatives*, above. The duration of all types of impacts would be long term, although certain specific impacts, such as those from seismic activity and construction noise, would occur only during the exploration and construction phases of individual development plans.

Potential direct impacts on species availability, species abundance, and user access from noise, traffic, and human activity, infrastructure, contamination, and legal or regulatory barriers would occur primarily for Kaktovik residents who use the program area. Potential indirect impacts on subsistence availability and abundance resulting from noise, traffic, and human activity, infrastructure, and contamination could extend

outside the program area to other communities, such as Nuiqsut, Arctic Village, Venetie, and other Alaskan and Canadian communities that harvest from the Porcupine Caribou Herd and Central Arctic Herd (**Table N-21** in **Appendix N**).

Changes in user access related to an increase in employment rates or income, including decreased time to engage in subsistence activities and increased income with which to support subsistence activities, are most likely for the community of Kaktovik, particularly ASRC and KIC shareholders; however, these changes could extend to other communities on the North Slope. Not all residents would experience the benefits of increased employment and income associated with development of the program area.

Because of its proximity to the program area and the high potential for development in areas of high overlapping use, the community of Kaktovik would experience the greatest intensity of potential effects associated with the proposed oil and gas leasing program. Impacts on subsistence resources and uses may also occur for other communities if oil and gas development in the program area results in changes to species abundance or availability, particularly caribou, which is a species of major importance to the communities of Kaktovik, Nuiqsut, Arctic Village, and Venetie, and waterfowl, another culturally important resource which migrate to other regions of Alaska on their way to and from nesting grounds in the program area (see **Tables N-6, N-11, and N-19** in **Appendix N**).

The greatest potential for direct impacts on Kaktovik subsistence users would occur in lands that are available for lease sale and subject to only STC, or subject to TLs with surface occupancy allowed. Development activities and infrastructure may occur in areas directly south of Kaktovik which are heavily used by community residents for winter hunting of caribou, furbearers, and to access hunting areas for Dall sheep. Residents also use several drainages to the south of the community, particularly fish holes along the Hulahula River, for winter harvests of Dolly Varden and other fish species. Oil and gas infrastructure would be prohibited within one mile of the Hulahula River, reducing the potential for direct effects to fishers along the river, although indirect effects may still occur.

Under Alternative B, seismic exploration would be allowed across the entire program area, thus increasing the area of impacts related to seismic noise, activity, and infrastructure. Seismic activities in winter and spring could affect fishing, wolf and wolverine hunting, and spring hunting of marine mammals in nearshore areas.

Under Alternative B, 721,200 acres of calving habitat would be available for leasing, which would result in the greatest potential impact on calf survival and overall herd numbers. Impacts associated with calving habitat could also result in impacts to the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site defined by the Gwich'in. In addition, Alternative B would include 0.5- to 1-mile setbacks, with no permanent oil and gas infrastructure, including roads and pipelines, allowed, for 10 major rivers, as well as several springs/aufeis (Lease Stipulations 1 and 3). Many of these rivers, such as the Hulahula, Okpilak, and Jago, are key drainages used for subsistence activities. Furthermore, residents of Kaktovik provided input during the public and government-to-government meetings for this EIS on subsistence areas and routes. The BLM incorporated this input when developing Lease Stipulation 1 (see **Appendix R**).

According to **Section 3.3.4**, the estimated total acres of potential disturbance and displacement under a hypothetical schematic anchor-field footprint would be 803,000 acres; this number would vary depending on future road and pad scenarios. In addition, a total of 332,900 acres of predicted future Porcupine Caribou Herd calving area for the years 2050-2059 would be open to leasing, with 119,000 open only to STC. As noted above, it is important that the Porcupine Caribou Herd have a large region from which to choose annual calving grounds, as the weather and available vegetation can affect calf survival (**Section 3.3.4**). According

to a model by Russell and Gunn (2019) using assumptions about development similar to Alternative B, development of the program area would result in a predicted herd decline of 17 and 18 percent, for 218,000 and 100,000 animals, respectively. While **Section 3.3.4** identifies potential limitations in the assumptions of the model, any decline in the abundance of caribou could affect resource availability for subsistence users of this herd.

Alternative B would also result in habitat loss, disturbance, and displacement of breeding birds across approximately 31,600 acres, and Alternative B would have the greatest impacts on unprotected streams and coastal areas (**Section 3.3.3** and **Section 3.3.2**). Thus, Alternative B would be most likely to affect fish and waterfowl availability and abundance for subsistence users.

Alternative B may include roadless developments for some of the CPFs and construction of associated airstrips, which would likely result in higher levels of air traffic, compared with roaded developments. Air traffic would likely cause local disturbances to wildlife, particularly caribou and waterfowl, within the program area, thus reducing their availability to individual hunters. Some timing and other restrictions on oil and gas activity (see Lease Stipulation 7 and 8 and ROP 23 and 34) would be in place for calving and post-calving habitats of the Porcupine Caribou Herd, which could reduce impacts on caribou abundance and availability. Coastal waters, lagoons, and barrier islands would be subject to NSO, which would minimize potential impacts on coastal hunters.

While mitigation measures can help reduce impacts on subsistence users, they cannot eliminate them. In some cases, well-intended measures meant to mitigate impacts may create new, unforeseen impacts. For example, the Alpine development is roadless in order to reduce its footprint and impacts on hunters and wildlife; however, lack of year-round road access necessitated high levels of plane and helicopter traffic, which became a primary source of impacts on caribou hunters. Mitigation measures may be less effective if not adequately enforced, communicated to local residents, or developed in consultation with local subsistence users.

Alternative C

The types of potential impacts under Alternative C would be the same as those described under Alternative B; however, the intensity of subsistence impacts would be substantially less under Alternative C. Less than half of the calving ground acres offered for sale under Alternative B would be offered for sale under Alternative C, and more lands would be subject to NSO lease stipulations or not made available for lease. In addition, most seasonally important areas for the Porcupine Caribou Herd in the program area would be closed to surface occupancy and therefore, unless the Porcupine Caribou Herd shifts their calving area substantially to the west, Alternative C would result in little displacement of Porcupine Caribou Herd caribou during the calving season. As a result, Alternative C would be less likely to affect calf survival and overall herd numbers compared to Alternative B. There would be a similar corresponding decrease in impacts to the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site under Alternative C. According to a model by Russell and Gunn (2019) using assumptions about development similar to Alternative C, development of the program area would result in a predicted herd decline of between 7 and 9 percent, for 218,000 and 100,000 animals, respectively. While **Section 3.3.4** identifies potential limitations in the assumptions of the model, any decline in the abundance of caribou could affect resource availability for subsistence users of this herd.

Under Alternative C, there would be a larger area of high overlapping subsistence use for Kaktovik which would not be available to surface occupancy. This area surrounds the Sadlerochit, Hulahula, and Okpilak rivers, all key subsistence drainages. The area south of Kaktovik between the Okpilak and Jago rivers, also an area of high overlapping use for caribou and furbearers, would continue to be available for lease sale and

subject to only STC. In addition, an area near the lower portion of the Sadlerochit River which has moderate overlapping subsistence use by Kaktovik, would be subject only to STC.

Under Alternative C, seismic exploration would be limited to areas available for lease sale, thus reducing the area of effect associated with seismic disturbances for resources such as fish, waterfowl, furbearers, and marine mammals in the nearshore environment.

Alternative C provides greater protections for avian and fish habitats, thus reducing the potential for availability and abundance impacts on these resources. Under Alternative C, more extensive mitigation measures would be used; a 0.5- to 4-mile setback for surface development would apply on all streams and waterbodies, and a larger NSO area would apply, including the entire Canning River delta. Alternative C includes greater setbacks from key subsistence drainages compared with Alternative B, including 4 miles for the Hulahula River and 3 miles for the Okpilak River, which would greatly reduce impacts on subsistence in those areas, particularly during the winter. Under Alternative C, no pads or CPFs would be allowed within 2 miles of the coast, reducing potential impacts on coastal subsistence hunters and fishers. As noted in **Section 3.3.4**, both Porcupine Caribou Herd and Central Arctic Herd aggregate along the coast during the insect harassment season, and a reduction in infrastructure in these areas would reduce the potential for deflection of caribou. Any development in coastal areas would be subject to NSO and various TLs and consultation requirements (Lease Stipulation 4). In addition, while seismic may occur throughout the program area regardless of leasing availability, oil and gas exploration activities including seismic would be prohibited in major nearshore waters, lagoons, and islands during the open water season, thus reducing the potential for seismic impacts on fishing in coastal areas as well as offshore and nearshore marine mammal hunting activities. Harvester avoidance of subsistence foods as a result of contamination concerns may be reduced under Alternative C due to the implementation of a monitoring study of contaminants in locally used subsistence foods (ROP 7).

Alternative C would limit the density of development in areas closed to lease sales or with NSO restrictions, which would retain the ability of caribou to navigate through those areas. In addition, reclamation of infrastructure would be an ongoing process for each development area, thus lessening the duration of impacts for individual developments related to infrastructure. However, reclamation activities would also introduce impacts through noise and human activity, and reclamation will likely not completely restore wetlands, vegetation, and wildlife habitat (see **Sections 3.3.1** and **3.3.3**).

Alternative C would require additional design features meant to address impacts on subsistence species and users. Alternative C would have less impacts than Alternative B because the larger area not offered for lease sale would limit the potential for direct impacts on subsistence users, species, and habitat to a smaller area. Furthermore, the NSO, CSU, and TL stipulations on the remaining acres would provide added protection in areas that are subject only to the STC in the other alternatives.

Alternative D

The types of potential impacts under Alternative D would be the same as those described under Alternative B; however, the intensity of subsistence impacts would be substantially less under Alternative D. Just under half of the program area (765,800 acres) would be available for lease sale, compared to 100 percent under Alternative B. Most of the remaining areas available for lease sale would be subject to NSO, with additional areas subject to CSU or TLs. Under Alternative D, 21,800 acres (3 percent of areas available for lease sale) would be available for lease sale and subject only to STC. This is approximately 5 percent of the area available under Alternative B and subject only to STC (620,000 acres).

Alternative D would include fewer areas of high overlapping subsistence use for Kaktovik, which would allow for surface occupancy, thus substantially reducing the amount of area where direct impacts on subsistence users may occur. Several areas to the west of the community along the coast would continue to be available for lease and subject only to STC. This includes an area at Brownlow Point, which is an important coastal caribou hunting, waterfowl hunting, and fishing area.

Under Alternative D, no leasing would be permitted within the Porcupine Caribou Herd comprehensive calving habitat area, which includes all current Porcupine Caribou Herd calving habitat, plus the addition of portions of Porcupine Caribou Herd projected calving habitat area (Severson et al.2021; Lease Stipulation 6). In addition, no CPFs would be allowed in the Porcupine Caribou Herd comprehensive post-calving habitat area, which includes all current Porcupine Caribou Herd post-calving habitat plus the addition of portions of Porcupine Caribou Herd projected post-calving habitat area (Severson et al. 2021), and other infrastructure would be limited to 510 acres in total. Only 100 acres of current and predicted future Porcupine Caribou Herd calving areas would be available for leasing under STC (**Section 3.3.4**). Lease Stipulation 6 also includes TLs to prohibit construction activities involving heavy equipment during the calving, post-calving, and insect-relief seasons.

Traffic-related requirements under Lease Stipulation 6 include lowered ground traffic speed limits; reduced helicopter landings; required minimum aircraft altitudes during the calving, post-calving, and insect-relief seasons; and evacuation of road sections when large groups of caribou approach. Under ROP 23, caribou satellite location data would be evaluated daily by both the Porcupine Caribou Technical Committee and Canadian counterparts. Instances of large aggregations of caribou within 30 km of any infrastructure would be subject to Emergency Closure Plans. As a result, Alternative D would be less likely to affect calf survival, overall herd numbers, and herd migration and movement than Alternatives B and C. Russell and Gunn (2010) and Russell et al. (2021) modeled potential population declines for the Porcupine Caribou Herd under different scenarios, including a scenario similar to Alternative D2 in the 2019 FEIS. Under this scenario, the model predicted a decline of between 6 and 9 percent; however, Alternatives D and D2 of the SEIS have more protections for caribou and therefore any declines would likely be lower than those predicted for the 2019 FEIS Alternative D2 (**Section 3.3.4**). The decrease in impacts to caribou, particularly within the Porcupine Caribou herd calving areas would have a corresponding decrease in impacts to the Gwich'in identified sacred site.

Compared to Alternative B, Alternative D would prohibit lease sales or surface occupancy in areas more frequently used by the Central Arctic Herd during the summer season, thus lessening the potential for deflection of Central Arctic Herd caribou as they migrate toward the Colville River Delta where Nuiqsut residents hunt them.

Alternative D provides more protections for avian and fish habitat than Alternatives B and C (**Section 3.3.2, Section 3.3.3**). Under Alternative D, seismic exploration would be limited to areas available for lease sale, thus reducing the area of effect associated with seismic disturbances for resources such as fish, waterfowl, furbearers, and marine mammals in the nearshore environment.

Alternative D also includes greater setbacks from key subsistence drainages compared with Alternative B, including 4 miles for the Hulahula River and 1 mile for the Sadlerochit River, which would greatly reduce impacts on subsistence in those areas, particularly during the winter (Lease Stipulation 1). However, setbacks from Okpilak River, a highly used subsistence area, would be reduced under Alternative D from 1 mile under Alternative B to 0.5 mile under Alternative D. Alternative D includes setbacks (0.25 mile) along an additional set of waterways. In addition, ROP 3 would prohibit permanent fuel storage stations within the

abovementioned setbacks. The increased setbacks and associated requirements could reduce concerns among subsistence users related to contamination of subsistence species. In addition, harvester avoidance of subsistence foods as a result of contamination concerns may be reduced under Alternative D due to the implementation of a monitoring study of contaminants in locally used subsistence foods, which would be developed in coordination with Tribal governments.

Under Alternative D, no pads or CPFs would be allowed in nearshore waters, lagoons, or barrier islands, with other infrastructure only allowed as permitted by the BLM Authorized Officer in coordination with Tribal governments. Additional NSO requirements associated with polar bear denning habitats would increase the area of no permanent oil and gas infrastructure to 5 miles in certain key areas (e.g., near denning habitat along the Sadlerochit River). Oil and gas exploration operations, including seismic, would not be permitted during the open water season (May 15 through November 1), reducing noise and seismic impacts on coastal fishing and offshore marine mammal hunting activities. Overall, these TLs and limitations on nearshore infrastructure would reduce potential impacts on coastal and marine subsistence hunters and fishers. Any development in coastal areas would be subject to NSO and various TLs and consultation requirements (Lease Stipulation 4).

Alternative D would require Master Development Plans for each field development, which would focus on minimizing development footprints and joint use of infrastructure between operators. Such plans could greatly reduce the overall amount of infrastructure within the developed areas, reducing direct impacts on subsistence users as well as impacts on wildlife movement. Reclamation of infrastructure would be an ongoing process for each development area, thus lessening the duration of impacts for individual developments related to infrastructure. However, reclamation activities would also introduce impacts through noise and human activity, and reclamation will likely not completely restore wetlands, vegetation, and wildlife habitat (see **Section 3.3.1** and **Section 3.3.3**).

Alternative D would require additional design features, including caribou monitoring, traditional knowledge, and contamination studies meant to address impacts on subsistence species and users. In addition, Alternative D would increase coordination with Tribal governments throughout the exploration, development, and monitoring processes. Alternative D would have fewer impacts than Alternatives B and C, because the larger area not offered for lease sale would limit the potential for direct impacts on subsistence users, species, and habitat to a smaller area. Potential impacts would be lower under Alternative D than Alternatives B and C for most subsistence resources including fish (**Section 3.3.2**), waterfowl (**Section 3.3.3**), terrestrial mammals including caribou (**Section 3.3.4**), and marine mammals (**Section 3.3.5**). Furthermore, the NSO, CSU, and TL stipulations on the remaining acres, particularly associated with caribou calving, post-calving, and insect relief habitats and seasons, would provide added protection in areas that are only subject to the STC in the other alternatives.

Alternative D2

The types of potential impacts under Alternative D2 would be the same as those described under Alternative B; however, the intensity of subsistence impacts would be substantially less under Alternative D2 compared to the other alternatives. Alternative D2 prioritizes leasing in areas of high hydrocarbon potential and includes additional protections for key resources. Approximately one-quarter of the program area (400,000 acres, the statutory minimum) would be available for lease sale, compared to 100 percent under Alternative B. Most of the remaining areas available for lease sale would be subject to NSO, with additional areas subject to CSU or TLs. Under Alternative D2, 80,900 (approximately 20 percent of areas available for lease sale) would be available for lease sale and subject to STC. This is approximately 13 percent of the area available under Alternative B and subject only to STC (620,000 acres), but higher than under Alternative D.

Alternative D2 would include the least amount of areas of high overlapping subsistence use for Kaktovik, which would allow for surface occupancy, thus substantially reducing the amount of area where direct impacts on subsistence users may occur. In addition, more areas would be unavailable for lease sale, including key subsistence use areas along the Hulahula, Okpilak, and Jago rivers, and key coastal hunting areas directly east of Kaktovik and in Camden Bay. In summary, unlike the other alternatives, no areas of high or moderate overlapping use for Kaktovik would be open to surface occupancy under Alternative D2. Areas open to surface occupancy would occur to the west and south of the community's primary harvesting area, in an area between the Canning River and inland from Camden Bay. Despite the smaller area available for leasing and allowing surface occupancy, it is likely that roads will still cross areas with no surface occupancy in order to access leased areas, and therefore impacts may occur in these areas related to road infrastructure and traffic.

Under Alternative D2, no leasing or surface occupancy would be permitted in Porcupine Caribou Herd calving grounds used more than 30 percent of years (**Section 3.3.4**). In addition, only 8,000 acres of predicted Porcupine Caribou Herd calving habitat area would be open to leasing under STC (Severson et al. 2021; Lease Stipulation 6). Only 1,900 acres of current and predicted Porcupine Caribou Herd post-calving areas (Severson et al. 2021, **Section 3.3.4**) would be open to leasing under STC. Limiting infrastructure to the western and northern portions of the program area under Alternative D2 would also reduce the likelihood and frequency of impacts to calving and post-calving caribou, although these areas have been used for calving in the past and may see more use in the future with warmer temperatures (**Section 3.3.4**). Lease Stipulation 6 includes TLs to prohibit construction activities involving heavy equipment during the calving, post-calving, and insect-relief seasons.

Traffic-related requirements under Lease Stipulation 6 include lowered ground traffic speed limits; reduced helicopter landings; required minimum aircraft altitudes during the calving, post-calving, and insect-relief seasons; and evacuation of road sections when large groups of caribou approach. Under ROP 23, caribou satellite location data would be evaluated daily by both the Porcupine Caribou Technical Committee and Canadian counterparts. Instances of large aggregations of caribou within 30 km of any infrastructure would be subject to Emergency Closure Plans. As a result, of all the action alternatives, Alternative D2 would be less likely to affect calf survival, overall herd numbers, and herd migration and movement. Russell and Gunn (2010) and Russell et al. (2021) modeled potential population declines for the Porcupine Caribou Herd under different scenarios, including a scenario similar to Alternative D2 in the 2019 FEIS. Under this scenario, the model predicted a decline of between 6 and 9 percent; however, Alternatives D and D2 of the SEIS have more protections for caribou and therefore any declines would likely be lower than those predicted for the 2019 FEIS Alternative D2 (**Section 3.3.4**). The decrease in impacts on the Porcupine Caribou Herd under Alternative D2, particularly in calving and post-calving areas, would have a corresponding decrease in potential impacts to the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site, compared with the other action alternatives.

Compared to Alternative B, Alternative D2 would prohibit lease sales or surface occupancy in areas more frequently used by the Central Arctic Herd during the summer season (**Section 3.3.4**), thus lessening the potential for deflection of Central Arctic Herd caribou as they migrate toward the Colville River Delta where Nuiqsut residents hunt them.

Alternative D2 provides more protections for coastal and marine habitat than the other alternatives. Under Alternative D2, no permanent oil and gas infrastructure would be permitted between the coast up to two miles inland (Lease Stipulation 9), although a one-time exception may be granted. In addition, Alternative D2 would close the greatest area of maternal polar bear denning habitat to leasing and would make additional denning

habitat subject to NSO areas, accounting for 94 percent of all dens. Coastal areas are key subsistence harvesting locations for caribou, fish, and waterfowl, with nearshore and coastal areas important for marine mammal hunting. Inland seismic exploration would be limited to areas available for lease sale, thus reducing the area of effect associated with seismic disturbances for resources such as fish, waterfowl, furbearers, and marine mammals in the nearshore environment.

Alternative D2 would greatly reduce the number of stream miles and watershed, lacustrine habitat, and deep lake habitat acres available for lease sale compared to Alternative B (**Section 3.3.2**). Alternative D2 would also allow leasing on the fewest acres of avian habitat and would be likely to affect the fewest number of individual birds. Similar to Alternative D, Alternative D2 also includes greater setbacks from key subsistence drainages compared with Alternative B, including 4 miles for the Hulahula River and 1 mile for the Sadlerochit River, which would greatly reduce impacts on subsistence in those areas, particularly during the winter (Lease Stipulation 1). However, setbacks from Okpilak River, a highly used subsistence area, would be reduced under Alternative D2 from 1 mile under Alternative B to 0.5 mile under Alternative D2. Alternative D2 includes greater setbacks than Alternative D from Marsh Creek and Carter Creek. In addition, ROP 3 would prohibit permanent fuel storage stations within the abovementioned setbacks. Alternative D2 would include additional protections for fish and aquatic species and habitat, including additional restrictions on exploratory drilling and seismic surveys in aquatic habitats, and additional timing restrictions and reporting requirements. Increased setbacks and associated requirements could reduce concerns among subsistence users related to contamination of subsistence species. Similar to Alternatives C and D, harvester avoidance of subsistence foods as a result of contamination concerns may be reduced under Alternative D2 due to the implementation of a monitoring study of contaminants in locally used subsistence foods, which would be developed in coordination with Tribal governments.

Under Alternative D2, no pads or CPFs would be allowed in nearshore waters, lagoons, or barrier islands, with other infrastructure only allowed as permitted by the BLM Authorized Officer in coordination with Tribal governments. Additional NSO requirements associated with polar bear denning habitats would increase the area of no permanent oil and gas infrastructure to 5 miles in certain key areas (e.g., near denning habitat along the Sadlerochit River). Oil and gas exploration operations, including seismic, would not be permitted during the open water season (May 15 through November 1), reducing noise and seismic impacts on coastal fishing and offshore marine mammal hunting activities. Overall, these TLs and limitations on nearshore infrastructure would reduce potential impacts on coastal and marine subsistence hunters and fishers. Any development in coastal areas would be subject to NSO and various TLs and consultation requirements (Lease Stipulation 4).

Similar to Alternative D, Alternative D2 would require Master Development Plans for each field development, which would focus on minimizing development footprints and joint use of infrastructure between operators. Such plans could greatly reduce the overall amount of infrastructure within the developed areas, reducing direct impacts on subsistence users as well as impacts on wildlife movement. Reclamation of infrastructure would be an ongoing process for each development area, thus lessening the duration of impacts for individual developments related to infrastructure. However, reclamation activities would also introduce impacts through noise and human activity, and reclamation will likely not completely restore wetlands, vegetation, and wildlife habitat (see **Section 3.3.1** and **Section 3.3.3**).

Similar to Alternative D, Alternative D2 would require additional design features, including caribou monitoring, traditional knowledge, and contamination studies meant to address impacts on subsistence species and users. Alternative D2 would require additional consultation with local traditional knowledge holders

regarding routes, locations, and designs for off-road travel, ice roads, snow trails, power lines, pipelines, road crossings, mine sites. Such consultation could help reduce impacts to subsistence resources and users.

Alternative D2 would have the least impact of all the alternatives because the larger area not offered for lease sale would limit the potential for direct impacts on subsistence users, species, and habitat to the smallest area. Potential impacts would be lowest under Alternative D2 for most subsistence resources including fish (**Section 3.3.2**), waterfowl (**Section 3.3.3**), terrestrial mammals including caribou (**Section 3.3.4**), and marine mammals (**Section 3.3.5**). Furthermore, the NSO, CSU, and TL stipulations on the remaining acres, particularly associated with caribou calving, post-calving, and insect relief habitats and seasons, would provide added protection in areas that are only subject to the STC under Alternatives B and C.

Transboundary Impacts

Impacts on subsistence may extend outside the US to the Inuvialuit, Gwich'in, and other user groups of Canada. Transboundary impacts would primarily affect subsistence harvests of Porcupine Caribou Herd caribou; however, Canadian groups also harvest other migratory animals, such as snow geese and Arctic cisco, which migrate through the program area. Arctic cisco pass by the program area when migrating between the Colville River delta and Mackenzie River delta, where they are harvested by Inuvialuit residents. According to available data, Aklavik and Tuktoyaktuk are the primary harvesters of cisco, and therefore would be most likely to be affected by changes to the migration or abundance of the resources (Joint Secretariat (N.W.T.) 2003). Alternative B would allow the most development near marine habitats and therefore is most likely to have population effects on Arctic cisco (see **Section 3.3.2**).

Snow geese are another species which may be vulnerable to transboundary impacts. Snow geese are a primary waterfowl species harvested by communities in the Inuvialuit Settlement Region. Displacement of snow geese from their fall staging areas in Alaska could in fact increase their use of staging habitats in Canada, potentially increasing their availability to Canadian user groups and decreasing their availability to harvesters elsewhere in Alaska (see **Section 3.3.3**). However, this increase in availability would occur during the fall months, while the spring months are the primary time to hunt waterfowl in most regions adjacent to the program area (see *Transboundary Subsistence Uses*).

Other harvested wildlife are marine mammals, including polar bear, seals, and whales, which pass through or by the program area on their way to traditional harvesting areas in Canada. Impacts on polar bears resulting from oil and gas exploration and development activities within the program area have a potential to affect user groups in Canada, particularly those in the Inuvialuit Settlement Region (Aklavik, Inuvik, Paulatuk, Sachs Harbour, Tuktoyaktuk, and Ulukhaktok). Inuvialuit polar bear hunters are vulnerable to transboundary impacts on polar bears, as their harvests are subject to quotas developed under the Inuvialuit-Inūpiat Agreement and based on periodic assessments of the polar bear population. Thus, any changes to polar bear abundance or health resulting from development of the program area could directly affect Canadian polar bear harvesters. Impacts on polar bear availability, health, and abundance could extend to subsistence uses in Canada if there are large-scale changes in the population. Sources of impacts would include direct loss or alteration of maternal denning habitat, noise and visual disturbances (particularly disturbances of maternal females during the denning period), disruption from seismic activity, and polar bear mortality resulting from human-polar bear interactions, premature den abandonment, traffic collisions, and spills. The SBS is particularly vulnerable to an increase in injury and mortality due to its declining status (**Section 3.3.5**). Large-scale changes in polar bear populations would be most likely under Alternative B, which would enable leasing in nearly all potential maternal denning habitat for polar bears in the program area. Communities in the Inuvialuit Settlement Region, who rely heavily on polar bears both for subsistence and as part of their local

economy, would be most likely to experience impacts of reduced polar bear abundance under Alternative B. Alternative D2 would exclude leasing or establish NSOs on 99 percent of polar bear denning habitat in the program area, and would therefore be unlikely to affect subsistence uses of this species. Beluga whales and bearded seals are other marine mammal species which migrate past the program area before being harvested by Indigenous hunters in northern Canada. However, these species are not expected to experience population-level effects resulting from development of the program area (see **Section 3.3.5**).

A large-scale spill associated with oil and gas development in the program area could affect the availability of these species to Canadian user groups; however, the likelihood of population-level impacts on marine mammals, fish, and waterfowl extending outside the program area is low (see **Section 3.3.2**, **Section 3.3.3**, and **Section 3.3.5**).

The importance of the Porcupine Caribou Herd and their particular vulnerability to activities in the US or Canada is evident through the establishment of certain agreements. One example is the Porcupine Management Agreement Between the Government of Canada and the Government of the United States of America on the Conservation of the Porcupine Caribou Herd. Other indications of the importance of the Porcupine Caribou Herd are establishment of the Porcupine Caribou Management Board and International Porcupine Caribou Board. Moreover, wildlife refuges and parks, such as Ivavvik National Park, are dedicated to conserving the herd (PCMB 2019, Slope 2006). Central Arctic Herd caribou rarely cross into Canada (see **Section 3.3.4**).

Inuvialuit and Canadian Gwich'in traditional hunting methods reflect observations and beliefs regarding caribou behavior. In particular, the movement of caribou into traditional harvesting areas can be affected by disruption of the leaders of a caribou herd. According to traditional knowledge, these herd leaders have special knowledge of migration routes and therefore establish routes for the rest of the herd to follow; thus, residents wait and let caribou start passing through an area before they start hunting them.

Actions and infrastructure that may affect the movement of caribou are of primary concern to Gwich'in, Inuvialuit, and other Canadian users of the Porcupine Caribou Herd (Padilla and Kofinas 2010, Padilla 2010). Traditional knowledge also includes the critical importance of calving and post-calving habitat in the Coastal Plain to the overall health and abundance of the Porcupine Caribou Herd. As noted in **Section 3.4.4**, Canadian Inuvialuit and Gwich'in have spiritual and cultural ties to the program area and to the Porcupine Caribou Herd as a whole; thus, any degradation of the Coastal Plain could have adverse effects on the social, spiritual, and cultural well-being of these Canadian users of the Porcupine Caribou Herd.

As noted under "Transboundary Subsistence Uses," Canadian user groups are the primary harvesters of Porcupine Caribou Herd caribou. Most of these Porcupine Caribou Herd caribou harvests are by Canadian Gwich'in and Inuvialuit, with the Vuntut Gwich'in community of Old Crow perhaps the most heavily reliant on caribou in terms of harvest amounts. Indirect impacts on species availability described under *Noise, Traffic, and Human Activity, Infrastructure, and Contamination*, could also apply to Canadian harvesters of the Porcupine Caribou Herd if the impacts are widespread. Development noise, traffic, and activity, in addition to the existence of such infrastructure as roads and pipelines, could delay caribou movement. This could affect their availability in traditional harvest areas at the expected times of year.

Contamination of the Coastal Plain or the Porcupine Caribou Herd or fears of such contamination could also result in residents avoiding harvests of Porcupine Caribou Herd due to health concerns; these impacts would be similar to those described above under *Contamination*. If exploration, development, production, and abandonment and reclamation of the program area results in a decline in the abundance of the Porcupine

Caribou Herd due to reduced calving success or large-scale changes in Porcupine Caribou Herd migration or distribution, then Canadian Gwich'in and Inuvialuit residents could experience decreased harvests of Porcupine Caribou Herd. There could be resulting impacts on subsistence hunting and associated processing, consumption, and sharing of caribou.

Over time, decreased opportunities to harvest Porcupine Caribou Herd could result in decreased opportunities to participate in other culturally important activities, such as sharing, and a loss of connection to traditionally important places. There could also be reduced opportunities to pass on traditional knowledge and cultural values to younger hunters, which could result in a loss of knowledge and values over time. A decline in subsistence harvests could also affect consumption of wild foods which could have an adverse Effect on the physical health of Inuvialuit and Gwich'in of Canada.

Action alternatives that affect the overall abundance of the Porcupine Caribou Herd would be most likely to cause transboundary impacts. As noted under *Transboundary Subsistence Uses*, recent population estimates are considered by the PCMB to support no harvest limits for Indigenous harvesters. If any of the alternatives result in declines in the Porcupine Caribou Herd population under 115,000, the PCMB may recommend additional harvest limits depending on the level of population decline (PCMB 2010). Similar restrictions were implemented, through commitments from the Yukon government and the Tr'ondek Hwech'in, after a population decline in the Fortymile Caribou Herd. Two decades of near-total harvest restrictions on this herd have had long-lasting subsistence and cultural impacts due to lost opportunity for an entire generation of harvesters (Tr'ondek Hwech'in 2019). Any restrictions on the Porcupine Caribou Herd are believed to have similarly substantial cultural and nutritional impacts on Canadian users of the Porcupine Caribou Herd (Tr'ondek Hwech'in 2024). Thus, population level effects on the Porcupine Caribou Herd could have direct impacts on harvests by Canadian user groups, the primary users of the Porcupine Caribou Herd. As stated in comments on the Draft Environmental Impact Statement by the Trondë'k Hwëch'in (2019),

The key point we want to stress is that if oil and gas development causes long-term adverse effects to the PCH, those that are most reliant on the herd (i.e., Canadian subsistence users) will pay the highest price in terms of loss of livelihood and culture.

Alternative B has the greatest potential to affect Porcupine Caribou Herd abundance and calf survival, and the greatest likelihood of affecting Canadian Gwich'in and Inuvialuit users of the herd (**Section 3.3.4**). Alternative B would allow for the greatest amount of development in the calving areas of the Porcupine Caribou Herd, and it would also result in more infrastructure within post-calving areas, thus increasing the likelihood of deflection. The total estimated area of potential disturbance and displacement under Alternative B would be 803,000 acres, and additional acres of predicted future Porcupine Caribou Herd calving and post-calving grounds would be open to leasing as well. Roadless developments under Alternative B would likely result in higher levels of air traffic. Some timing and other restrictions on oil and gas activities (see Lease Stipulation 7 and 9 and ROP 23 and 24) would reduce, but not eliminate impacts on calving and post-calving habitats of the Porcupine Caribou Herd. Alternative C would restrict lease sales in more than half of the calving grounds offered for lease sale under Alternative B; in addition, more lands would be subject to NSO lease stipulations and most seasonally important areas for the Porcupine Caribou Herd would be closed to surface occupancy. Thus, Alternative C would be less likely to affect calf survival and overall herd numbers, and less likely to affect harvests for Canadian users. Finally, Alternatives D and D2 would not allow oil and gas leasing or surface occupancy on Porcupine Caribou Herd calving grounds used in more than 30 percent of years, in addition to some projected calving grounds. These alternatives would also require additional design features, including an Adaptive Management Plan to identify research needs, implement subsistence and other monitoring and research efforts, evaluate existing mitigation efforts, and identify management changes as

needed. In addition, Alternative D2 would offer approximately half of the acres offered for lease sale under Alternative D and would prohibit infrastructure within two miles of the coast. Therefore, Alternative D2 is the least likely to result in impacts to Canadian subsistence users as it has the greatest protections for key caribou habitat, is the least likely to cause changes in caribou migration, would reduce the amount of potential infrastructure on the Coastal Plain, would reduce potential impacts to waterfowl and nearshore species such as marine mammals and fish, and would include adaptive management plans to ensure effective mitigation.

Cumulative Impacts

Past and present actions that have affected subsistence uses and species are as follows:

- The degradation of traditional lands by development
- Restrictions on traditional uses resulting from the creation of wildlife refuges and national parks
- Government hunting and harvesting regulations
- Recreation and sport hunting and fishing
- Scientific research and associated activities, including those associated with oil and gas development
- Transportation corridors, including the Dalton Highway and marine highway systems
- Climate change

Today, oil and gas development on the North Slope is a primary source of impacts on subsistence for the Iñupiat, especially for the community of Nuiqsut, which is now connected to the Alpine development via a year-round road. The Gwich'in of Arctic Village and Venetie live in an area relatively undisturbed by development; however, construction of the TAPS and Dalton Highway have affected subsistence access and species availability for Gwich'in communities. Many residents believe that the highway and pipeline have changed caribou migration across the region.

In all regions, increased sport hunting and fishing and associated air traffic have increased competition for local subsistence users and have disturbed and displaced subsistence species, such as caribou.

In Canada, subsistence users face similar impacts, including construction of the Dempster Highway and associated traffic, increased plane and boat traffic, oil and gas exploration and development (including in the Beaufort Sea and to the west in Alaska), sport hunting and recreation, and contamination from DEW Line sites (Slope) 2006, Wildlife Management Advisory Council (North Slope) and Aklavik Hunter and Trappers Committee 2009).

Impacts of climate change on Alaskan and Canadian hunters and harvesters include changes in the predictability of weather conditions, such as the timing of freeze-up and breakup, snowfall levels, storm and wind conditions, and ice conditions, such as ice thickness on rivers and lakes. All of these affect individuals' abilities to travel to subsistence use areas when resources are there. In addition, subsistence users experience greater risks to safety when travel conditions are not ideal (e.g., thin ice on rivers and lakes, melting permafrost).

Changes in species abundance or distribution resulting from climate change also affects the availability of those species to subsistence users and has caused subsistence users to travel farther (e.g., traveling farther to reach the ice pack) and spend more time and effort on subsistence activities (Brinkman 2016).

For further discussion of the past and present impacts of climate change, see *Climate Change*, above. The effects of climate change described under *Affected Environment* (**Appendix B**) could influence the rate or degree of the potential cumulative impacts.

Development of the program area would likely change subsistence species abundance, availability, and user access for Kaktovik. It could also change species abundance and availability for Nuiqsut, Arctic Village, Venetie, and other Alaskan and Canadian communities who use species that migrate through the program area, such as users of the Porcupine Caribou Herd and Central Arctic Herd. The project would introduce large-scale oil and gas development into an area that was previously undeveloped and used primarily for subsistence and recreation.

Under any of the alternatives, Nuiqsut and Kaktovik have direct uses of the program area, and additional communities have traditional uses there or rely heavily on the Porcupine Caribou Herd, which calve in and use the program area, and ducks and geese that nest in the program area before migrating south in the fall. Most communities that have traditional uses of the program area or use species that migrate through it are rural, low-income, and are not connected by roads. Residents there rely on subsistence to support their mixed economy.

Development of the program area would introduce impacts on availability for key species, such as caribou, fish, marine mammals, and waterfowl. Roads associated with development may benefit increased access for Kaktovik residents into areas previously inaccessible during certain times of year. However, roads may also introduce impacts such as deflection of caribou and increased competition along the road corridor. Kaktovik may also benefit from reduced costs associated with shipping and supplies.

Impacts on species availability may be most pronounced for communities that do not experience increased income associated with the oil and gas development, such as jobs or dividends, or that do not experience project-related lower costs of subsistence supplies and equipment, food, or other goods. These communities, such as Arctic Village and Venetie, would have less opportunity to purchase or invest in fuel and equipment to adjust to changes in access and species availability.

Proposed and current activities affecting the subsistence study communities include additional or continued development of oil and gas resources in the onshore and offshore development. Reasonably foreseeable activities that could impact subsistence uses and species include the following:

- Seismic exploration
- Expansion of CD5, GMT1, and GMT2
- Willow, Nuna, Nanushuk developments in the Colville River region
- Continued development of Kuparuk and Prudhoe Bay
- Continued development of the Point Thomson development
- Development of a natural gas pipeline from the North Slope to Cook Inlet (Alaska LNG pipeline)
- Development projects in the Beaufort Sea, including the existing Endicott and Northstar projects, and the proposed Liberty project

Other reasonably foreseeable activities are additional infrastructure projects, including new permanent and seasonal roads, and airport and community infrastructure improvements through the ASTAR program; the continued and increased marine vessel traffic and air traffic associated with shipping, scientific research, and recreation, tourism, and business in the region, ongoing recreational activity within the program area including polar bear viewing, guided sport hunting, and boating and camping; and ongoing impacts of climate change.

Both climate change and development activities can affect subsistence use areas, harvester access, and species availability. Specifically, impacts of oil and gas exploration and development on user access to traditional harvesting areas, such as the presence of roads and pipelines which make cross-country travel difficult, could

be compounded by increased melting of permafrost and decreased ice and snow cover which affect snowmachine and ATV travel. When considered together, these two impact sources could result in greater effects on subsistence travel and greater risks to safety as residents travel farther to avoid inaccessible areas. Changes in species abundance, migration, and health resulting from development activities may also be compounded by climate change effects on the same species. For example, changes in the timing of certain wildlife migrations due to warmer temperatures, such as the fall caribou migration, could be compounded by oil and gas development in the program area if infrastructure and ground traffic further delay caribou movement toward communities waiting farther south. Similarly, increased growth of woody brush in the Coastal Plain could increase the likelihood of tundra fires, which have been reported by subsistence users as affecting caribou migration (NSB 2021a). These effects in combination with infrastructure or traffic-related deflection of caribou could affect user groups in Alaska and Canada. Future development of the program area would lead to further expansion of the developed area on the North Slope, which would contribute to impacts on subsistence species abundance and availability, and user access for subsistence users across the region. Oil and gas and other development would result in the physical removal of traditional subsistence hunting and harvesting areas in addition to decreased access to certain areas through security and access restrictions and through user avoidance of development areas.

Increased infrastructure and activity in and around the program area and in offshore areas could contribute to a feeling of being boxed in by development, particularly for Kaktovik. Concerns to this effect have been reported as early as the 1980s, when some Kaktovik hunters indicated they no longer approach or cross the Canning River because of oil and gas activity to the west of it (Impact Assessment Inc. 1990a). The overall area available for subsistence use would likely shrink over time due to the increasing presence of infrastructure and human activity in traditional use areas. While Kaktovik hunters would adapt, to varying extents, to the changes occurring around them and may continue to harvest subsistence foods at adequate levels, their connection to certain traditional areas may decrease over time.

Increased development around Nuiqsut, including development in the program area and other reasonably foreseeable developments including the Alaska LNG and Willow projects, could also contribute to existing concerns about being surrounded by development and losing connections to traditional harvesting areas (SRB&A 2017b, 2009a). The shifting of subsistence use areas away from oil and gas development would likely continue and result in long-term changes in subsistence use patterns. In addition, the increased existence of road corridors in traditional use areas could shift how residents access subsistence harvesting areas, such as via roads, but could also affect species availability, particularly for those who choose not to use roads. Such changes, including increased use of roads combined with changes in harvesting patterns and species availability, have been documented elsewhere in Alaska (SRB&A 2007, 2009b, 2018); however, in Kaktovik, where overland travel in the program area has been heavily restricted, residents may be more likely to use roads for hunting, particularly in light of recent comments that caribou availability along the coast has declined. This increased use of roads in the program area could represent a countervailing beneficial impact on other potential adverse impacts discussed in this section. In Nuiqsut, as hunters report that the caribou herd is remaining farther west due to development activities, the road provides access to areas with a greater availability of caribou. However, the road is also viewed as causing deflection of caribou. Such a scenario may occur in Kaktovik, where the caribou are further deflected from the coast due to the presence of roads, but hunters are able to access these caribou due to road access. Road use may affect overall subsistence use patterns for Kaktovik, with residents shifting away from hunting caribou by boat along the coast or inland by snowmachine, in favor of hunting along the road system. Such a shift may benefit the community in terms of increased harvest success and increased access for certain residents while also reducing opportunities to transmit traditional knowledge about traditional harvesting practices and locations.

Over time, development and infrastructure projects would increase the area accessible by outsiders, including non-local hunters, who could increase competition for locals, and resulting in higher levels of oil and gas activity; examples are vessel, ground, and air traffic, seismic activity, gravel mining and blasting, and drilling.

Other similar activities, including shipping activity not subject to CAAs and research-related air traffic, would also continue and be additive to oil and gas related disturbances. As climate change reduces the sea ice extent, marine traffic within the Arctic Ocean will likely increase. Increased shipping within the Beaufort Sea could affect the availability and health of marine species for Nuiqsut and Kaktovik subsistence users. Both communities have reported impacts of vessel traffic on whaling activities as well as hunting of other marine mammal species. Harvesters may adapt to such changes by increasing the amount of effort and time spent on the land, investing in more efficient means of travel, and shifting to new subsistence areas in an effort to increase harvest success rates. Increased income, primarily expected to occur for Iñupiaq residents, could help offset some of these impacts by providing cash with which to purchase fuel, equipment, and supplies for subsistence pursuits. Certain individuals, such as those who are low income, those with limited time or modes of travel, or those who choose to avoid development (including roads) may be less able to adapt to changes in species availability and harvester access.

Construction of additional roads and infrastructure in the future would contribute to fragmentation of habitat for such resources as caribou, moose, and waterfowl. Infrastructure that would remove usable habitat for these resources and in the case of caribou could cause substantial changes in range distribution. Impacts on migrating caribou increase with density of roads and infrastructure (see **Section 3.3.4**).

An analysis of potential impacts on the Porcupine Caribou Herd resulting from development of the program area resulted in the conclusion that changes in caribou behavior, such as increased time running and less foraging, would lead to changes in body condition and thus affect pregnancy and calf survival rates. The models predicted a population decline of between 6 percent (Alternative D) and 17 percent (Alternative B) (**Section 3.3.4**). The models are based on various assumptions, some of which are not consistent with the alternatives; thus, the conclusions may overestimate the effects on the Porcupine Caribou Herd. Still, a decline in herd size as estimated above could have substantial impacts on communities that rely on the Porcupine Caribou Herd, particularly for those with a less diverse subsistence base, such as Arctic Village and Old Crow. Declines in Porcupine Caribou Herd abundance may be compounded by the impacts of climate change which have been linked to population declines in migratory caribou populations in recent decades (see **Section 3.3.4**).

If the program area eventually becomes open to public access, the potential for impacts on local communities from increased competition and overall human activity would be much higher. Furthermore, infrastructure projects, including those cumulative impacts from implementing such projects as ASTAR, could result in greater public access to traditional hunting areas in the program area, particularly on the North Slope. If road, ROWs, or reclaimed ROWs increase access into the program area, state and federal regulators may respond by introducing stricter hunting and harvesting regulations as well. This would affect the availability of wildlife to local communities. Increased competition and decreased wildlife availability may result in residents having to travel farther and spend more time, money, and effort to harvest such resources as moose and caribou.

The availability of certain subsistence species, such as caribou, sheep, moose, small land mammals, fish, waterfowl, or vegetation, would likely be reduced, particularly under Alternative B where larger areas would be open to leasing and surface occupancy. The causes would be development of the program area, in combination with future oil and gas development in surrounding onshore and offshore areas, increased marine, ground, and air traffic, and construction of new infrastructure projects. Finally, the increased risk of a large-scale oil spill in the cumulative case could affect the health and abundance of certain resources such as fish

and waterfowl (see **Section 3.3.3** and **Section 3.3.4**), increase avoidance of subsistence foods by concerned harvesters, and cause cultural and spiritual impacts due to degradation of the land, water, and subsistence resources. If these projects reduce species availability for subsistence study communities or if they decrease access to traditional use areas, then residents may have to spend greater amounts of time, effort, and money in order to locate and procure these species.

Residents may also have to travel farther to less familiar areas to find subsistence species, with greater risks to their health and safety. This could be compounded by similar impacts related to climate change. While some hunters respond to changes in species availability by taking more trips and increasing costs in order to harvest what they need, others may choose to take fewer trips because of lack of funds or reduced success.

Nuiqsut residents have shown adaptability to the changes around them and continue to harvest subsistence species at rates similar to before; however, despite continued harvests, residents stress that the frequent disturbances to subsistence activities, loss of connection to traditional use areas resulting from oil and gas infrastructure, and increased time and effort spent by harvesters continue to affect their overall subsistence way of life (SRB&A 2017b). As development continues to grow around the community, it remains to be seen if, or for how long, the community of Nuiqsut would be able to continue adapting to the changes.

If changes in species availability occur on a larger scale as a result of the leasing program, such as changes in migration or overall abundance of the Porcupine Caribou Herd, then communities farther away, particularly those with a high reliance on the Porcupine Caribou Herd that would not experience increased economic activity and revenues from the increased development, could experience cumulative impacts. Examples are Arctic Village and Venetie and such Canadian user groups as the Inuvialuit and Gwich'in; all could experience greater net impacts on subsistence. An overall decline in caribou abundance could have far-reaching impacts on Alaskan and Canadian subsistence user groups, particularly when considered in combination with climate change, changes in harvest regulations, increased sport hunting and recreation, and increased development activities within the range of the Porcupine Caribou Herd.

As noted in Kofinas et al. (2016) a total loss of caribou harvests would represent a 31 percent decline in subsistence foods for Venetie and a 32 percent decline for Kaktovik. While harvest data are not available to provide a similar estimate for Arctic Village, impacts would likely be even higher, as residents from that community rely less on other subsistence species. In addition, Canadian communities harvest most of the Porcupine Caribou Herd and could therefore experience a greater proportion of impacts should there be a large-scale decline in Porcupine Caribou Herd abundance. Such a scenario would cause a severe disruption in social ties and cohesion for Alaskan and Canadian study communities. In addition, reductions in subsistence harvests could increase consumption of store-bought foods, having negative impacts on nutrition and health for the study communities (**Section 3.4.11**). Because of the unique role the Arctic Refuge plays in Gwich'in cultural identity and spiritual beliefs, any development within the program area, even in the absence of impacts on caribou availability, would likely have adverse and long-term cultural and spiritual impacts on the Gwich'in.

Cumulative impacts on waterfowl abundance and availability resulting from increased predation on nests, long-term to permanent loss and alteration of habitat, increased disturbance, and climate change would likely result in decreased availability of waterfowl over time. Such impacts would extend throughout the program area and to communities outside the program area who utilize ducks and geese through harvests and sharing networks.

Cumulative impacts could also occur outside the program area for other subsistence species, particularly in regions that are already experiencing declines in subsistence populations. For example, a reduction in the availability of Porcupine Caribou Herd caribou or waterfowl, either through reduced harvests or disruptions in sharing networks, could contribute to existing impacts in western Alaska associated with declining Chinook and chum salmon populations on the Yukon and Kuskokwim rivers. A decline in the Porcupine Caribou Herd, waterfowl populations, or impacts to polar bear denning habitat, could also contribute to impacts in the Inuvialuit region, which is already experiencing a decline in the SBS polar bear population.

While increased income and revenue from oil and gas development may help offset the need to purchase additional store-bought foods in Kaktovik, these benefits would likely not extend to other potentially affected communities such as the Gwich'in communities of Arctic Village and Venetie. In addition, for any community, the economic benefits would not address the nutritional, social, and cultural impacts of harvesting fewer subsistence foods.

Ultimately, cumulative impacts on subsistence could alter subsistence use areas, user access, and species availability for Iñupiat, Gwich'in, and Inuvialuit subsistence users. When subsistence users' opportunities to engage in subsistence activities are limited, then their opportunities to transmit knowledge about those activities, which are learned through participation, are also limited. If residents stop using portions of the program area for subsistence purposes, either to avoid development activities or reduced availability of subsistence species, the opportunity to transmit traditional knowledge to younger generations about those traditional use areas would be diminished. Communities would likely maintain a cultural connection to and knowledge of these areas as part of their traditional land use area; nevertheless, the loss of direct use of the land could lead to reduced knowledge among the younger generation of place names, stories, and traditional ecological knowledge associated with those areas.

There would also be fewer opportunities for residents to participate in the distribution and consumption of subsistence foods, ultimately affecting the social cohesion of the community. Any changes to residents' ability to participate in subsistence activities, to harvest subsistence species in traditional places at the appropriate times, and to consume subsistence foods could have long-term or permanent effects on the spiritual, cultural, and physical well-being of the study communities. This would be due to the diminishing social ties that are strengthened through harvesting, processing, and distributing subsistence foods and by weakening overall community well-being.

For additional discussion of potential cumulative impacts on sociocultural systems, including culture and belief systems, see **Section 3.4.4**.

Thus far, communities on the North Slope have adapted to the changes occurring around them and maintained a strong subsistence identity. A number of studies have documented the resilience of subsistence communities in the face of sudden or dramatic changes, noting that communities and households often respond to scarcity of one resource (caribou) by increasing their harvests of another, or by increasing income sources when subsistence foods are less available (Martin 2015). Resilience allows communities and households to adjust to changes while maintaining access to key cultural resources and activities. However, the resiliency of communities to change does not mean that these communities do not experience negative impacts, nor does it imply that they can simply adapt to all future forces of change. There could be a tipping point where residents are no longer able to adapt to such changes; however, it is not possible based on available data to predict when or how that may occur (see **Section 3.4.4**). Presumably, Alternatives most likely to contribute to changes in the availability or abundance of subsistence species (e.g., Alternative B) would be most likely to inhibit a community's ability to adapt to the changes. The continued maintenance of subsistence traditions would

depend on the continued availability of subsistence species and the continued ability of subsistence users to access harvesting areas, particularly if there are changes in species abundance, distribution, or migration. Dramatic declines in key resources, or large changes in access to the program area (e.g., opening roads to the public) could result in permanent negative impacts subsistence for the study communities.

Alternatives that allow the greatest amount of land to be developed and which have fewer timing and other restrictions would provide the greatest potential contribution to cumulative effects on subsistence uses and species. This is because they would have a greater effect on species availability, subsistence resource abundance, and user access; thus, Alternative B would have the largest potential contribution to cumulative effects on subsistence uses, followed by Alternative C, while Alternatives D and D2 would have the smallest potential contributions to cumulative effects on subsistence uses.

3.4.4 Sociocultural Systems

Direct and Indirect Impacts

This section identifies potential sociocultural impacts on Iñupiaq and Alaska Gwich'in sociocultural systems; Inuvialuit and Canadian Gwich'in sociocultural impacts are discussed under a separate heading *Transboundary Impacts* at the end of this section.

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such post-lease activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain.

Seismic activities could occur within the program area, although the extent that they are allowed varies by action alternative; under Alternative B, seismic exploration would be allowed across the entire program area, while under Alternatives C, D, and D2, seismic exploration would be limited to areas of lease sales. The analysis considers potential impacts on sociocultural systems from on-the-ground activities. As described in the previous section, Iñupiaq and Gwich'in sociocultural systems are based on social and kinship ties, subsistence harvesting, and a deep connection to the land and its resources. Oil and gas development in the program area would likely affect sociocultural systems by introducing changes to traditional subsistence lands and resources, and the social, health, and cultural environment, and local and regional economies.

Alternative A

Under Alternative A, no oil and gas leasing would take place in the program area. Sociocultural systems among the Iñupiat and Gwich'in would remain unaffected by additional oil and gas development and the associated economic, biological, and social changes. Iñupiaq and Gwich'in sociocultural systems would likely continue to evolve as a result of existing forces of change, such as increased modernization and technology, development and associated activities (such as oil and gas development and research) outside the Coastal Plain, infrastructure and transportation projects, changes to land status, environmental changes, and increased outsiders in traditional use areas.

Impacts Common to All Action Alternatives

This section discusses potential impacts on sociocultural systems from oil and gas activities, including those common to all action alternatives, such as exploration, development, production, and abandonment and

reclamation (see **Appendix C**). While impacts on sociocultural systems do not vary greatly in terms of types of impacts, the intensity of impacts may vary by phase; these differences are identified where applicable.

The primary factors that may result in impacts on sociocultural systems are as follows:

- Changes in income and employment levels
- Changes in available technologies
- Disruptions to subsistence activities and uses
- Influx of outside temporary workers associated with post-lease oil and gas activities
- Influx of outsiders coming into the subsistence study communities

Many of the lease stipulations and ROPs designed to reduce potential impacts on subsistence uses and resources (see **Section 3.4.3**) would also help reduce sociocultural impacts. ROP 40 and the required orientation program would also help address sociocultural impacts. The goal would be to increase sensitivity and understanding of personnel to community values, customs, and lifestyles and to training designed to ensure strict compliance with local and corporate drug and alcohol policies.

Additional ROPs and lease stipulations directly address subsistence uses and activities; these are ROPs 2, 4, 6, 7, 18, 20, 21, 23, 34, 36-39, 41, 46 and Lease Stipulation 9. While most sociocultural effects (both beneficial and adverse) would affect the community of Kaktovik in a program-area wide context, a number of sociocultural effects could extend beyond Kaktovik to other North Slope communities, or, in some instances, to the Inuvialuit or Alaska and Canadian Gwich'in. The specific communities and regions that could be affected are discussed below for the various types of effects. The sociocultural effects would last longer than 5 years.

Changes in Income and Employment Levels

Increased income and employment levels—most likely to occur among the Iñupiat of the North Slope—could affect sociocultural systems by changing the socioeconomic status of certain community members, reducing the time spent by certain individuals on harvesting subsistence species and thus affecting social ties in the community, and increasing the amount of cash available to engage in subsistence activities and support subsistence-related equipment and infrastructure. An influx of cash into a small, rural community can have both beneficial and adverse impacts on sociocultural systems. Traditional Iñupiaq and Gwich'in societies are based on social and kinship ties, which are established and strengthened through the procurement, processing, consumption, and sharing of subsistence species (see *Affected Environment* in **Appendix B**).

Certain households or individuals play a particularly important role in the harvesting of subsistence resources and distribution of those foods to households and individuals who are unable to hunt or harvest for themselves. These super-harvester households have been identified through previous ADFG research, which found that 30 percent of households generally harvest 70 percent of the total community harvest (Wolfe 2004). An increase in employment opportunities may result in some of these households shifting from their role as super-harvesters to high-earning households, as they lack the time to engage in subsistence activities as frequently as they once did. This could result in weakening or shifting of certain social ties in the community, and these changes could persist in the long term.

While this could cause social stresses in a community, Kofinas and others (2016) note that the role of super-harvester households often changes over time and that communities are in fact quite resilient to these changes. Additionally, the roles of super-harvester households and high-earning households are not mutually exclusive; Kofinas and others (2016) found that super-harvester households also tend to have high income.

In Kaktovik, 14.3 percent of all households were high-harvest, high-income households; of all high-harvesting households, 43 percent were high-income, compared with 24 percent of medium-harvest households and 30 percent of low-harvest households (Kofinas et al. 2016); thus, an increase in income and employment may increase opportunities for subsistence harvesting. That said, a sudden and substantial increase in employment and income may cause a more dramatic shift in the role of super-harvester households in the community, and it may take longer for the community to adjust to the changes.

During the initial period of post-lease development, there may be a period of adjustment during which certain super-harvester households are not as productive as household members obtain employment and new roles are established. As a result, distribution of subsistence foods throughout the community could temporarily decline; however, the community would likely adapt by providing monetary support to others in the community to increase subsistence production.

If communities experience a dramatic change in the availability of such subsistence species as caribou, there would likely be a tipping point where residents would no longer be able to adjust to such changes. It is not possible, based on available data, to predict when or how such a tipping point may occur; however, recent data comparing road-connected communities to those not connected by roads have shown that road-connected communities have substantially lower subsistence harvests than those not connected (Guettabi et al. 2016). In the analysis, road-connected communities are in more densely populated areas and on publicly accessible roads. Roads associated with development of the program area are not expected to be publicly accessible except for local communities (such as Kaktovik) through use agreements with industry; however, if roads are eventually opened to the public or if they substantially increase access to visiting hunters, the project could have greater impacts on sociocultural systems for local communities, particularly Kaktovik. Furthermore, if oil and gas development within the program area resulted in measurable declines in the abundance of subsistence species or large-scale changes in the timing or location of migrations, the associated decline in subsistence harvesting success would likely have far-reaching sociocultural impacts. Alternatives most likely to contribute to changes in the availability or abundance of subsistence species (e.g., Alternative B) would be most likely to inhibit a community's ability to adapt to changes. The potential sociocultural impacts of such an occurrence would likely be adverse and long term (Chapin et al. 2009).

In addition to super-harvester households, high earning households also play an important role in the subsistence economy. This is because they often provide financial support to subsistence harvesters in the community as well as in their own households. As noted above, super-harvester households also tend to be high-earning households. An increase in employment and income resulting from the proposed oil and gas leasing program could therefore have potential positive effects on social ties once community roles are established; however, increased income opportunities in a community can also cause greater potential income disparities between households, especially if certain households are not shareholders in the ANCSA corporations. Such disparities can affect social relations and leadership roles in a community.

In general, an increase in employment opportunities could strengthen residents' resolve to remain in their home communities rather than moving in search of employment. Subsistence activities have been shown to persist despite increased income and wage employment, which demonstrates that the importance of subsistence is not limited to its nutritional benefits alone (Kruse 1991).

Increased income from dividends and employment will not be equally shared among region, communities, and community residents due to differences in shareholder status and ability to work. These differences could cause tensions between communities and among community residents.

Changes in income and employment associated with oil and gas activities would have the most potential direct impact on the Iñupiaq community of Kaktovik and may also extend to other Iñupiaq communities, although direct participation in oil and gas activities by North Slope residents would be relatively limited (**Section 3.4.10**). It is unknown how many workers from North Slope communities would obtain employment associated with oil and gas activities in the program area. As noted in **Section 3.4.10** (Economy), 0.2 percent of oil and gas jobs on the North Slope in 2022 were held by NSB residents. Kaktovik is closest to the program area, and therefore, when compared with other North Slope communities, Kaktovik residents are most likely to obtain employment associated with development and support activities in the program area. Employment levels may be higher if development projects are connected by road and residents are able remain in their communities while working.

Jobs and job-related income associated with development of the program area would likely be highest during the production phase. Jobs during exploration and development phases would be seasonal, temporary, and fewer (**Section 3.4.10**). Levels of local employment would depend largely on the implementation of adequate local hiring policies and opportunities for NSB-based businesses and corporations.

In addition, residents of Kaktovik would likely see greater economic revenues associated with the oil and gas leasing program as shareholders of KIC. Revenue would be minimal during the leasing stage but would increase during development or construction through property taxes. It would increase again during the production phase through royalties and other taxes (**Section 3.4.10**).

The City of Kaktovik may also receive bed tax revenues associated with increased visitors to the community, particularly during the initial years of development and construction. An increase in tax revenue could support sociocultural systems by contributing to community improvements (**Section 3.4.10**).

On a regional scale, Iñupiat communities across the North Slope may see increased economic activity resulting from post-lease activities as shareholders of the ARSC and through NSB revenues, and they may also be exposed to a greater number of employment opportunities. By contrast, Gwich'in residents would likely see only modest economic activity and revenues associated with profit sharing from ASRC to their regional corporation (Doyon, Inc.). The Gwich'in communities closest to the program area—Arctic Village and Venetie—do not belong to Doyon and do not have ANCSA corporations holding land in the program area; therefore, they would see limited economic activity and revenues associated with the proposed oil and gas leasing program (See **Section 3.4.10**).

The comparative lack of economic activity for the Gwich'in, especially the communities of Arctic Village and Venetie because they do not have ANCSA corporations, could make those communities more vulnerable to social impacts, particularly those associated with disruption of subsistence activities. Furthermore, other Gwich'in communities that have less access to caribou (e.g., Birch Creek, Beaver, Circle) may experience impacts if Arctic Village and Venetie are unable to share caribou as frequently. If communities experience reduced harvests, their increased reliance on store-bought foods could introduce financial hardships for certain households. Without the increased economic activity associated with development, communities are more vulnerable to its impacts and less able to adapt to environmental and social changes resulting from the development.

Changes in Available Technologies

Increased income and employment resulting from future oil and gas exploration, development, and production could also increase access to technologies, such as subsistence equipment and fuel. Access to such

technologies could aid subsistence users in accessing subsistence harvesting areas, particularly if development results in subsistence users having to travel farther or spend longer to find and harvest subsistence species.

Communities close to oil and gas development areas may also eventually have greater access to high-speed Internet and strong cell phone reception. In recent years, greater use of and access to cell phones and social media has shifted how residents in and between communities communicate with one another. In some ways, it has expanded social ties by facilitating connections across regions of Alaska and encouraged the establishment of trading relationships. Greater access to transportation and shipping options can also have a positive impact on sharing networks and the ability to bring goods directly into the community.

Finally, road corridors resulting from development of the program area could open up access for local hunters to subsistence areas not easily accessible or restricted during certain times of the year (see **Section 3.4.3**). In Nuiqsut, construction of road corridors associated with development of CD5 and GMT-1 has increased the use of those corridors by residents for subsistence hunting. In particular, residents who benefit from the presence of roads are those who do not have access to boats or overland modes of travel, such as four-wheel-drive vehicles and snowmachines and those who have limited time due to jobs and other commitments (SRB&A 2018a).

Some individuals have increased their participation in subsistence activities due to the increased access to hunting areas. In contrast, other hunters have decreased their use of areas surrounding roads to avoid industry and because of their personal preferences against road hunting. Data also show a possible shift away from traditional use areas to areas west of the community, where the road systems have increased access (SRB&A 2022). Because of this, access to roads may increase subsistence opportunities for many hunters and possibly increase overall participation in hunting; however, road access may also change traditional harvesting patterns and avoidance by certain individuals. Such changes would be most likely to occur for Kaktovik because of its proximity to the program area.

Changes in subsistence harvesting patterns resulting from road access may, over time, reduce use of other traditional harvesting areas. This may reduce opportunities for residents to transmit traditional knowledge about traditional harvesting techniques and locations to younger generations, resulting in a loss of cultural knowledge over time.

Gwich'in communities would be less likely to experience impacts associated with changes in available technologies due to their distance from the program area, in addition to the relative lack of income and employment opportunities associated with development of the program area.

Disruptions to Subsistence Activities and Uses

Disruptions to subsistence activities associated with future oil and gas activities could potentially indirectly affect social cohesion. As noted above, increased income and employment levels could change social ties and organization by causing certain individuals and households to shift to new roles that are less focused on subsistence production. Such impacts would be highest during the production phase, when the number of available, permanent jobs would be highest. In addition to the extent that development in the program area disrupts subsistence or reduces the availability of certain species to subsistence harvesters, residents may either experience reduced harvests of subsistence foods, or they may spend greater time, effort, and expense in pursuit of subsistence resources (see **Section 3.4.3**).

Potential impacts on subsistence species availability would likely occur throughout the life of activities in the Coastal Plain. They are most likely to affect terrestrial and riverine resources, such as caribou, fish, and

waterfowl, with minimal impacts expected for other key species, such as bowhead whales. Impacts would be minimal during the leasing phase and would increase during the exploration and construction phases. During the production phase, disruptions to subsistence activities in the way of noise and traffic would be lower; however, impacts related to infrastructure would be higher.

Nuiqsut residents have reported impacts on species availability associated with nearby developments but continue to harvest wildlife at levels similar to before; however, continued harvests do not imply an absence of impacts. Residents report adapting to changes in species availability by shifting to new hunting areas, spending more effort and time on the land, or changing hunting methods, such as hunting caribou along newly introduced road corridors.

Kaktovik residents are most likely to experience decreased availability of subsistence resources in the vicinity of development; however, larger changes to caribou migration and distribution could extend to additional communities, such as Nuiqsut and Anaktuvuk Pass (for the Central Arctic Herd); and Venetie, Arctic Village, Fort Yukon, and Inuvialuit and Gwich'in user groups in Canada (for the Porcupine Caribou Herd). Such changes in caribou migration and distribution could result in residents spending more time and effort hunting for caribou and traveling farther with greater risk to their safety (see **Section 3.4.3**). Even localized or “limited” changes in caribou migration or distribution from a biological perspective can affect the availability of caribou to harvesters, because residents may have limited means to travel farther to reach caribou herds, particularly at certain times of the year (BLM 2014). Communities who already travel great distances to harvest caribou, such as Fort Yukon, may be particularly vulnerable to smaller changes in caribou distribution.

An economic study on subsistence impacts in Nuiqsut (Northern Economics Inc. 2019) analyzed potential economic impacts of the GMT-1 project looking at several different hypothetical scenarios. The study found that if the GMT-1 project resulted in residents having to travel 20 miles farther to harvest caribou, the economic impacts could be substantial, at an increase of more than \$45,000 in subsistence costs. However, if residents increased their use of the road system to hunt for caribou, residents would likely see a decrease in subsistence costs of more than \$13,000. Thus, hunters who embrace the use of roads for caribou hunting may see economic benefits, while those who avoid roads may experience economic impacts. The economic benefits of using roads to hunt caribou does not consider the negative impacts associated with a loss of traditional hunting areas, increased impact experiences due to proximity of development infrastructure and activities, loss of traditional knowledge due to a change in hunting methods and areas, and associated impacts on sociocultural systems.

An inability to harvest adequate subsistence foods can have adverse social consequences for a community. Decreased harvests of subsistence species—particularly key species such as bowhead whales (for the Iñupiat) and caribou (for the Iñupiat and Gwich'in)—results in decreased opportunities for participation in such activities as processing, consuming, and sharing subsistence foods and participating in culturally important feasts and festivals. These are all important in maintaining and strengthening social and cultural ties in the community. Disruptions to residents' ability to hunt, harvest, distribute and consume subsistence foods can cause psychological stress and increased rates of depression, anxiety, and substance use disorders (Palinkas et al. 1993). These types of impacts have been documented both in response to large-scale disasters (e.g., Exxon Valdez oil spill; Palinkas et al. 1993) and to impacts brought about by climate change which can cause reduced species availability and dangerous travel and hunting conditions (Mason and Craver 2023). Reduced harvests would also have economic impacts on residents who rely on subsistence harvests to offset the high cost of living (including groceries and heating oil) in rural communities.

While some Alaskan Gwich'in communities (e.g., Beaver, Birch Creek, Chalkyitsik, Circle) have limited harvests of caribou in recent years (see **Section 3.4.3**), sharing of caribou between Gwich'in communities remains important. A decrease in subsistence harvests of caribou by Arctic Village, Venetie, and Fort Yukon could result in fewer opportunities to share with other Gwich'in communities, which could in turn affect social and kinship ties.

While impacts on availability of bowhead whales are unlikely, there may be impacts on caribou availability, particularly for the community of Kaktovik (see **Section 3.4.3**, Subsistence). Larger impacts on availability could have community and region-wide effects on sharing networks, which could affect social ties if harvest shortfalls persist (see **Section 3.4.3**, Subsistence).

The inability of subsistence harvesters to provide for their community can also have adverse social and health and nutritional consequences (**Section 3.4.11**). Residents have reported that during times of reduced harvest success, they have witnessed increased social problems, such as drug and alcohol use, particularly among younger subsistence hunters (SRB&A 2009b). The inability to fulfill certain traditional social roles, which are a key part of Iñupiaq and Gwich'in cultural identity, could also have negative effects on mental health, cultural identity, and social cohesion. Traditional roles include those of whaling captains among the Iñupiaq and the role of men as providers for their communities within both the Iñupiaq and Gwich'in cultures. Fulfilling these roles is often marked by ceremonies (e.g., *Nalukataq*; a young man's first harvest which is shared with the community) which reinforce and strengthen social ties within the community.

Introduction of new infrastructure and industrial traffic in traditional use areas, and associated changes in subsistence travel routes and harvesting patterns could increase the risk of injuries and accidents during subsistence activities, causing adverse social effects; however, these impacts would likely lessen over time, as residents become accustomed to security policies and traveling within developed areas (**Section 3.4.11**).

Finally, decreased use of certain traditional areas, due to changes in species availability, user access, or the degradation of one's experience on the land resulting from noise and human activity, can result in fewer opportunities for residents to pass on traditional knowledge about those places, weakening the cultural associations residents have with the land. These impacts could extend to future generations and result in a loss of cultural knowledge and identity.

Potential impacts on subsistence would occur to varying extents for different communities. Direct impacts from future oil and gas exploration, development, and production on subsistence activities would likely be greatest for Kaktovik; however, potential indirect impacts on the availability of species, such as caribou, could occur for Nuiqsut, Arctic Village, Venetie, and other Alaskan and Canadian communities that rely on the Porcupine Caribou Herd and Central Arctic Herd through harvests or sharing (see **Section 3.4.3**). The Gwich'in, who refer to themselves as the "Caribou People" and for whom the Arctic Refuge is sacred ground, would experience cultural and spiritual impacts resulting from any development of the program area (see **Sections 3.4.2** and **B.4.2** for a discussion of a Gwich'in identified sacred site and potential impacts). Infrastructure and development activity associated with oil and gas leasing in the Arctic Refuge would be viewed by many Gwich'in as degradation of sacred grounds, and any impacts on the Porcupine Caribou Herd, the backbone of Gwich'in cultural identity (see **Section 3.4.2**), would have adverse and long-term impacts on the Gwich'in people. These types of indirect effects could be as great or greater in magnitude as certain direct effects. These impacts would increase where there is development within the Gwich'in identified sacred site.

Even in the absence of physical disruptions to the distribution or migration of Porcupine Caribou Herd caribou, real or perceived contamination or degradation of the Coastal Plain or the Porcupine Caribou Herd could have

adverse social and psychological effects on Iñupiaq and Gwich'in community members; examples are sense of self, community, and efficacy and psycho-social well-being. This would be due to the importance of the area to Iñupiaq and Gwich'in cultural and spiritual identity. See **Section 3.4.3** for a more detailed discussion of potential impacts on subsistence by community.

Influx of Non-Resident Temporary Workers and Outsiders

Another potential source of potential impacts on sociocultural systems is an influx of non-resident temporary workers associated with future oil and gas activities into local communities and traditional use areas and a general influx of outsiders into local communities associated with increased development in the region. While interactions with non-locals have become increasingly common in rural Alaskan communities, most Iñupiaq and Gwich'in communities continue to be relatively remote and primarily Alaska Native.

Interactions with non-locals can sometimes cause discomfort for residents when non-locals do not respect or understand local traditional values and customs. Residents have expressed discomfort conducting subsistence activities when non-locals are around for fear that their traditions are misinterpreted, misunderstood, or exploited for political purposes. Such concerns have become particularly prevalent in today's climate of social media posts, viral videos, and negative online backlash (Oliver 2017).

Witnessing non-locals mistreating or disrespecting the land and its species can also have adverse cultural and spiritual impacts on locals, especially if the area holds particular importance to a community. In the case of the Coastal Plain, the area is in Kaktovik's core subsistence harvesting area and is considered sacred ground to the Gwich'in because of its importance to the health and survival of the Porcupine Caribou Herd. Any perceived degradation or contamination of the Coastal Plain could have sociocultural consequences to the Gwich'in people, even if the availability of caribou remains the same. These impacts could be magnified within the Gwich'in identified Porcupine Caribou Herd Calving Grounds sacred site.

The presence of temporary workers who are associated with future post-lease development in traditional hunting areas could result in negative interactions between subsistence users and workers due to a lack of cultural understanding and respect on the part of the workers, or miscommunication of policies and procedures surrounding use of the land by local residents for hunting purposes. Nuiqsut residents have periodically reported uncomfortable interactions with oilfield workers, particularly when traveling or hunting along the local road systems. Such interactions include being stopped by security personnel and questioned, or being told that residents are not authorized to be in certain areas (SRB&A 2022, 2021, 2020). The number of workers would be highest during the production phase of development (**Section 3.4.10**). Workers would be housed at on-site camps during all development phases and therefore interactions between workers and Kaktovik residents would be somewhat limited (**Section 3.4.11**).

If future oil and gas activities facilitate or promote access of outsiders into Kaktovik for reasons associated with development or otherwise, potential impacts could include increased social problems (e.g., outsiders bringing in drugs and alcohol), lack of infrastructure to accommodate the increase in visitors (e.g., lodging and transportation), and conflicts resulting from lack of knowledge or respect of traditional values.

Native women and girls experience substantially higher rates of domestic and other violence, including sex trafficking, compared to other populations in the United States. Oil and gas development in or near Native communities in the United States may raise the already high risk of violence to Native women and girls (Walker 2015). Several studies have documented a connection between extractive industries and increased rates of violence towards Native women and girls in other regions of the United States (University of Colorado Boulder 2020). One study found that rates of violent victimization increased 23 percent in the oil producing

Bakken region of Montana and North Dakota, while rates of victimization declined over the same time period in non-Bakken regions. Rates of serious violent victimization, including sexual assault and unlawful sexual contact, increased 38 percent (Martin et al. 2019). The potential for increased rates of violence is particularly likely when man camps are situated within or near Native communities. Because oil and gas workers in the program area would be housed at on-site camps for all stages of development, interactions between oil and gas workers and Kaktovik residents would be minimal outside of the camps and road system, and camp housing would have restrictions on drug and alcohol use. Furthermore, the isolated nature of the program area from the rest of Alaska would reduce the likelihood of an increase in sex trafficking to other regions.

An increase in population associated with post-lease activities is not expected for Kaktovik; workers are expected to stay in work camps and return to other areas of Alaska or outside Alaska (**Section 3.4.10**); however, while an increase in permanent residency is not likely, it is possible that Kaktovik would experience an increase in visitors associated with oil and gas industry, as has happened in Nuiqsut.

Alternative B

Under Alternative B, the types of potential impacts on sociocultural systems associated with future exploration, development, and production activities would be the same as those described under *Impacts Common to All Action Alternatives (Appendix B)*. The duration of impacts would be long term for all types of impacts, although certain types of impacts, such as interactions with temporary workers, may be more frequent or intense during the exploration and construction phases of development. Potential impacts related to an increase in visitors to and an influx of nonresident temporary workers associated with future development would occur in the general vicinity of the action area or in the community of Kaktovik. Increases in income and employment levels may extend beyond the program area to other communities on the North Slope and possibly outside the North Slope. Changes related to disruption of subsistence activities and uses could extend outside the program area to other communities that rely on the Porcupine Caribou Herd and Central Arctic Herd herds, including other North Slope harvesters of the Central Arctic Herd (Nuiqsut, Anaktuvuk Pass, Atqasuk, Utqiagvik), Gwich'in harvesters of the Porcupine Caribou Herd (including Arctic Village, Venetie, and Fort Yukon), and other harvesters of the Porcupine Caribou Herd and Central Arctic Herd such as Wiseman, Coldfoot, Alatna, Allakaket, and Bettles (see **Section 3.4.3**).

While most impacts would occur on the Porcupine Caribou Herd, development of the program area may also contribute to existing impacts of oil and gas development on the Central Arctic Herd. For residents of Nuiqsut, who rely on the regular movement of the Central Arctic Herd toward the Colville River delta during the summer, disruptions to Central Arctic Herd movement and distribution could also reduce the availability of caribou, thus affecting sociocultural systems in that community as well.

Because the community of Kaktovik is the primary subsistence user of the program area, the people of this community would experience the greatest intensity of effects associated with future oil and gas activities in the Coastal Plain as they relate to changes in income and employment, changes in available technologies, an influx of nonresident outsiders and temporary workers, and direct disruptions to subsistence resources and uses. Potential impacts on sociocultural systems from disruptions to subsistence may also occur for other Iñupiaq and Gwich'in communities if future oil and gas exploration, development, and production in the program area results in changes to species abundance, health, or availability, particularly caribou.

Because of the spiritual and cultural importance of the Coastal Plain and Porcupine Caribou Herd calving grounds to the people of Kaktovik, Arctic Village, and Venetie, as well as the Gwich'in and Iñupiaq people as a whole, any disruption to that herd or perceived contamination or degradation of calving grounds in the program area would have sociocultural impacts on Iñupiat and Gwich'in, in terms of their belief systems,

cultural identity, and the impact of development in the sacred calving grounds of the Porcupine Caribou Herd (see **Section B.4.2** for a discussion of Gwich'in identified sacred sites within the Coastal Plain).

Alternative C

The types of potential impacts under Alternative C would be the same as those described under Alternative B. Because fewer acres of caribou calving grounds would be available for leasing, and because more lands would be subject to development restrictions, the intensity of potential impacts on the Porcupine Caribou Herd, and therefore the intensity of sociocultural impacts under Alternative C as they relate to decreased caribou availability, may be less than under Alternative B (see **Sections 3.4.3** and **Section 3.3.4**). However, sociocultural impacts associated with perceived contamination or degradation of the Coastal Plain from development, particularly among the Gwich'in, would likely be similar under any alternative that includes leasing in the Porcupine Caribou Herd calving area. While the intensity of impacts related to caribou availability would be lessened under Alternative C, other sociocultural impacts associated with changes in income and employment would likely be similar under any alternative and would primarily affect the community of Kaktovik. Examples are changes in availability technologies, influx of temporary workers and outsiders, and perceived or real degradation of traditional harvesting areas (see *Changes in Income and Employment Levels*).

Alternative D

The types of potential impacts under Alternative D would be the same as those described under Alternative B. Less than half of the program area available for leasing under Alternative B would be available for leasing under Alternative D. Most of the remaining areas available for lease sale would be subject to NSO, CSU or TLs. As a result, under Alternative D, direct impacts on subsistence, and associated sociocultural impacts for the community of Kaktovik, would be reduced. Alternative D would allow surface occupancy on fewer acres that have high overlapping subsistence use (see **Section 3.4.3**); therefore, the potential for subsistence impacts related to infrastructure (e.g., impacts on harvester access and species availability) would be less. Alternative D also would prohibit oil and gas exploration operations, including seismic in nearshore waters, thus reducing potential impacts on marine mammal hunters in Kaktovik and Nuiqsut (for bowhead whales).

Under Alternative D, no leasing would be permitted within the Porcupine Caribou Herd comprehensive calving habitat area, which includes all current Porcupine Caribou Herd calving habitat, plus the addition of portions of Porcupine Caribou Herd projected calving habitat area (Severson et al.2021; Lease Stipulation 6). In addition, no CPFs would be allowed in the Porcupine Caribou Herd comprehensive post-calving area, which includes all current Porcupine Caribou Herd post-calving habitat plus the addition of portions of Porcupine Caribou Herd projected post-calving habitat area (Severson et al.2021). Alternative D would also include multiple additional lease stipulations intended to reduce impacts on caribou during the calving, post-calving, and insect-relief seasons. As a result, Alternative D would be less likely than Alternatives B and C to affect calf survival, overall herd numbers, and herd migration and movement (see **Section 3.3.4**). Therefore, Alternative D would reduce the intensity and likelihood of effects on the Porcupine Caribou Herd, and on Iñupiat, Inuvialuit, and Gwich'in sociocultural systems.

While the Gwich'in view the entire Coastal Plain as “The Sacred Place Where Life Begins”, a primary concern among the Gwich'in related to the Coastal Plain is the protection of the Porcupine Caribou Herd calving grounds (see **Section B.4.2** for a discussion of Gwich'in identified sacred sites within the Coastal Plain). Thus, while the Gwich'in will likely still experience sociocultural effects associated with perceived degradation and contamination of the Coastal Plain, concerns related to the health and survival of the Porcupine Caribou Herd may be less under Alternative D as a result of the extra protections to Porcupine Caribou Herd calving grounds.

While the intensity of impacts related to caribou availability and subsistence impacts would be lessened under Alternative D, other sociocultural impacts associated with changes in income and employment would likely be similar under any action alternative, and they would be most likely to affect the community of Kaktovik.

Alternative D2

The types of potential impacts under Alternative D2 would be the same as those described under Alternative B. Approximately one-quarter of the program area available for leasing under Alternative B would be available for leasing under Alternative D2. Most of the remaining areas available for lease sale would be subject to NSO, with additional areas subject to CSU or TLs. As a result, direct impacts on subsistence, and associated sociocultural impacts for the community of Kaktovik, would be reduced under Alternative D2. Alternative D2 would allow surface occupancy on the fewest acres that have high or moderate overlapping subsistence use (see **Section 3.4.3**); therefore, the potential for subsistence impacts related to infrastructure (e.g., impacts on harvester access and species availability) would be less. Alternative D2 also would prohibit oil and gas exploration operations, including seismic, in nearshore waters, thus reducing potential impacts on marine mammal hunters in Kaktovik and Nuiqsut (for bowhead whales). Under Alternative D2, no leasing would be permitted within two miles inland from the coast, thus reducing potential impacts to key coastal and nearshore species including waterfowl, fish, caribou, and marine mammals, and associated concerns by subsistence users.

Under Alternative D2, no leasing or surface occupancy would be permitted in Porcupine Caribou Herd calving grounds used more than 30 percent of years (**Section 3.3.4**). In addition, only 8,000 acres of predicted Porcupine Caribou Herd calving habitat area would be open to leasing under STC (Severson et al.2021; Lease Stipulation 6). Only 1,900 acres of current and predicted Porcupine Caribou Herd post-calving areas (Severson et al. 2021, **Section 3.3.4**) would be open to leasing under STC. Limiting infrastructure to the western and northern portions of the program area under Alternative D2 will also reduce the likelihood and frequency of impacts to calving and post-calving caribou, although these areas have been used for calving in the past and may see more use in the future with warmer temperatures (**Section 3.3.4**). Alternative D2 also would include multiple additional lease stipulations intended to reduce impacts on caribou during the calving, post-calving, and insect-relief seasons. Therefore, of all the action alternatives, Alternative D2 would have the lowest intensity and likelihood of effects on the Porcupine Caribou Herd, and on Iñupiat, Inuvialuit, and Gwich'in sociocultural systems.

While the Gwich'in view the entire Coastal Plain as “The Sacred Place Where Life Begins”, a primary concern among the Gwich'in related to the Coastal Plain is the protection of the Porcupine Caribou Herd calving grounds (see **Section B.4.2** for a discussion of identified sacred sites within the Coastal Plain). Thus, while the Gwich'in will likely still experience sociocultural effects associated with perceived degradation and contamination of the Coastal Plain, concerns related to the health and survival of the Porcupine Caribou Herd may be less under Alternative D2 as a result of the extra protections to Porcupine Caribou Herd calving grounds.

While the intensity of impacts related to caribou availability and subsistence impacts would be lessened under Alternative D2, other sociocultural impacts associated with changes in income and employment would likely be similar under any action alternative, and they would be most likely to affect the community of Kaktovik. The lower number of facilities and oil production under Alternative D2 would result in Alternative D2 having fewer economic effects associated with revenues, jobs, and incomes (**Section 3.4.10**).

Transboundary Impacts

Impacts on sociocultural systems could extend to communities outside the US, particularly in the context of disruptions to subsistence activities. The project would likely not change income and employment, available technologies, or an influx in temporary workers and outsiders for the Inuvialuit, Canadian Gwich'in, and other Porcupine Caribou Herd user groups in Canada; nevertheless, it may affect the availability of subsistence species, thus affecting sociocultural systems. The types of impacts to sociocultural systems resulting from a change in species availability would be similar to those discussed above (*Disruptions to Subsistence Activities and Uses*). As noted above, Canadian Gwich'in and Inuvialuit, the primary Canadian users of the Porcupine Caribou Herd, rely heavily on harvests of Porcupine Caribou Herd caribou and have a spiritual connection both to the Porcupine Caribou Herd and to the lands that the Porcupine Caribou Herd depend on. The Inuvialuit and Gwich'in also have traditional uses of, kinship with, and sharing ties to the Coastal Plain.

Inuvialuit and Gwich'in land claims were centered on their ability to manage Canadian First Nations lands and resources to protect them from degradation by outsiders. Specifically, the Ivvavik National Park was established by the Inuvialuit to protect the Canadian calving grounds of the Porcupine Caribou Herd. In addition, the establishment of U.S.-Canada agreements and organizations meant to protect the Porcupine Caribou Herd highlights the vulnerability of herd disruptions to either group. Any disruption to Porcupine Caribou Herd habitat—particularly calving habitat—or perceived contamination or degradation of those lands could result in social stress and loss of cultural connection to traditional lands, as well as a sense of powerlessness and loss of self-determination and control over management of the Porcupine Caribou Herd. These changes could lead to an erosion of Canada-U.S. relations, particularly as they relate to joint management of wildlife populations.

As discussed in **Section 3.4.3** (Subsistence Uses and Resources), Canadian user groups, including both Gwich'in and Inuvialuit groups, represent 85 percent of overall harvests of the Porcupine Caribou Herd; as such, they would experience the most impacts if the Porcupine Caribou Herd population declines substantially or if herd migration or distribution changes to the extent that Canadian hunters experience reduced species availability (see **Section 3.4.3**). The NWT Gwich'in, Vuntut Gwich'in, and the Inuvialuit are the primary users of the Porcupine Caribou Herd in terms of harvest amounts. Should Porcupine Caribou Herd availability or abundance decline, Canadian hunters may experience reduced harvests. A substantial reduction in caribou availability would reduce the opportunities to participate in traditional hunting, harvesting, processing, consumption, and sharing practices. That would erode key social and cultural values and activities over time. Both the Gwich'in and Inuvialuit have a spiritual and cultural connection to the Coastal Plain and the Porcupine Caribou Herd. The Porcupine Caribou Herd plays a particularly important role in Gwich'in belief systems and spirituality. Other Canadian groups, including the Tr'ondë'k Hwëch'in and the Nacho Nyak Dun have cultural ties to the Porcupine Caribou Herd even though harvests have declined in recent years (**Section 3.4.3**). Traditional laws of the Tr'ondë'k Hwëch'in center around their spiritual and social relationship with caribou (Tr'ondë'k Hwëch'in 2024).

In addition to caribou, impacts on other subsistence species that migrate through or past the program area, including Arctic cisco, waterfowl, and marine mammals, could also affect subsistence uses for Canadian user groups. The Inuvialuit in particular harvest marine mammals that occur offshore from and in coastal area of the Coastal Plain. Such species include polar bears, bearded seals, and beluga whales. Polar bear harvests are co-managed by the U.S. and Canada through the Inuvialuit-Iñupiat Polar Bear Management Agreement and, therefore, Inuvialuit hunters would be particularly vulnerable to population declines resulting from development of the program area. Polar bear hunting is a key subsistence and cultural activity among the Inuvialuit, and polar bear hunting is also an important part of the local economy through guided polar bear

hunts. Thus, impacts to polar bear availability and abundance could have social, cultural, and economic impacts to Inuvialuit communities such as Aklavik and Inuvik. Other key species among the Inuvialuit which migrate through or past the Coastal Plain before being harvested by Inuvialuit residents include Arctic cisco, of particular importance to Aklavik and Tuktoyaktuk, and snow geese, a primary waterfowl species harvested by the Inuvialuit. The Gwich'in of Canada also harvest waterfowl that migrate to or from the program area, including black ducks, snow geese, mallards, Canada geese, and white-fronted geese (**Section 3.4.3**).

Changes in the availability of subsistence species to Gwich'in, Inuvialuit, and other Canadian user groups could result in residents spending more time, effort, and money to harvest wildlife, traveling farther with greater risks to safety, and experiencing decreased overall harvest success. A reduction in subsistence foods could have negative social effects on Gwich'in and Inuvialuit communities as these communities would also experience a decline in opportunities to participate in the processing, consumption, sharing, and celebration of subsistence foods. Residents may also experience negative financial impacts and increased food insecurity if they are forced to spend more money on store-bought foods (Government of Yukon 2018).

Impacts to the availability of subsistence foods among the Inupiat, Inuvialuit, and Alaskan and Canadian Gwich'in resulting from the proposed leasing program could disrupt kinship ties and sharing networks. Sharing is a key value among all three groups, and sharing subsistence foods helps maintain and strengthen kinship and social ties. Kofinas et al. (2016) found that in a single year among Kaktovik households, sharing occurred between Kaktovik and two Inuvialuit villages and included sharing of beluga and Dolly Varden (**Section 3.4.3**). The Gwich'in have similar cross-border sharing ties (GNWT 2024). Disruptions to sharing networks could weaken these familial and social ties.

As discussed under **Section 3.4.3**, the proposed leasing program is not expected to cause large population declines in the Porcupine Caribou Herd, although a greater degree of development in calving grounds could increase the likelihood of decreased calf survival rates and declines in herd abundance. Because Alternative B would allow the most development in Porcupine Caribou Herd calving grounds, and the most development near marine habitats, it would be most likely to cause sociocultural impacts on the Canadian Gwich'in, Inuvialuit, and other Canadian user groups. Alternatives D2, which would prohibit leasing in current Porcupine Caribou Herd calving grounds and would offer the fewest lands available for lease sale, would have the least potential to affect Porcupine Caribou Herd migration, distribution, and abundance, and therefore would be the least likely to cause sociocultural impacts on Canadian user groups.

Cumulative Impacts

Past, present, and reasonably foreseeable future activities, in combination with oil and gas development in the program area, would increase the potential for sociocultural impacts, including changes in income and employment levels, changes in available technologies, disruptions to subsistence activities and uses, and increased interactions with outsiders. Past and present actions that have affected sociocultural systems among the Inupiat, Inuvialuit, and Gwich'in include oil and gas development, onshore and offshore transportation and infrastructure projects, scientific research, increased recreation and tourism, demographic changes, changes in land status, government regulations, modernization, and climate change.

North Slope Inupiat, Inuvialuit, and Gwich'in have experienced the impacts of development on their social organization since their initial contact with European explorers in the nineteenth century. The traditional social structure, which was based around extended kinship ties, trading partnerships, and friendships, underwent numerous changes throughout the nineteenth and twentieth centuries. These changes include the centralization of residents into permanent communities through mandatory education, the introduction of modern

technology and changes to the traditional subsistence-based economy through the introduction of a cash economy, and the incorporation of Native peoples into new systems of laws and governing systems.

More recent changes are the following:

- Degradation of traditional lands from development
- Creation of wildlife refuges and national parks and resulting restrictions on subsistence uses (e.g., restrictions on use of ATVs in national parks (Dunn 2017))
- Government hunting and harvesting regulations
- Recreation and sport hunting and fishing
- Scientific research and associated activities, including research associated with oil and gas development
- Transportation corridors, including the Dalton Highway and marine highway systems
- Climate change

Today, oil and gas development on the North Slope is a primary source of impacts on social organization among the Iñupiat, especially for the community of Nuiqsut, which is now connected to the Alpine development via a year-round road. Economic impacts associated with oil and gas development are another major driver of change on the North Slope. While it has brought increased revenue, which has contributed to infrastructure development and social services on the North Slope, increased income opportunities and disparities have also introduced tensions in communities. One example is the lack of shareholder status for certain community members.

Although the Gwich'in live in an area relatively undisturbed by development, construction of the TAPS and Dalton Highway have affected subsistence access and resource availability. Many residents believe that the highway and pipeline have changed caribou migration species the region.

In all regions, increased sport hunting and fishing and associated air traffic have increased competition for local subsistence users and have disturbed and displaced subsistence species, such as caribou. Hunting by nonresidents occurs on the North Slope, particularly along the Dalton Highway, but also in areas north of the Brooks Range and within the program area. Caribou is the primary game species hunted in the program area (**Section 3.4.6**). Within the program area, for the 2022-23 time period, guided hunts are permitted and nonresident hunters are limited to two bull caribou during the months of August and September (U.S. Fish and Wildlife Service 2023, Alaska Department of Fish and Game 2022). In Canada, the primary sources of impacts on sociocultural systems are oil and gas development, construction of the Dempster Highway, and increased sport hunting and recreation in the region.

Impacts of climate change are from changes in the predictability of weather conditions, such as the timing of freeze-up and breakup, snowfall levels, storm and wind conditions, and ice conditions, such as ice thickness on rivers and lakes. All of these factors affect individuals' abilities to travel to subsistence use areas when species are there. In addition, subsistence users may experience greater risks to safety when travel conditions are not ideal. Changes in species abundance or distribution from climate change can also affect the availability of those species to subsistence users or may cause them to travel farther and spend more time and effort on subsistence activities, and taking greater risks to safety (Brinkman 2016). Climate change may also affect sociocultural systems by decreasing subsistence harvests and subsequently increasing food insecurity and economic inequality.

Proposed and current activities affecting the study communities include additional or continued development of oil and gas resources in the onshore and offshore development. Reasonably foreseeable activities that could impact sociocultural systems include the following:

- Seismic exploration
- Expansion of CD5, GMT1, and GMT2
- Willow, Nuna, Nanushuk developments in the Colville River region
- Continued development of Kuparuk, Prudhoe Bay, Point Thomson, and projects in the Beaufort Sea (Endicott and Northstar)Liberty project in the Beaufort Sea
- Development of a natural gas pipeline from the North Slope to Cook Inlet (Alaska LNG pipeline)

Other reasonably foreseeable activities are additional infrastructure projects, such as new permanent and seasonal roads, airport and community infrastructure improvements through the Arctic Strategic Transportation and Resources (ASTAR) program, the increased marine vessel traffic and air traffic associated with shipping, scientific research, and recreation and tourism activities and business in the region. The proposed oil and gas leasing program could also lead to or facilitate additional oil and gas development outside the program area and other development and infrastructure projects. Climate change will continue to occur, compounding other impact sources.

All of these activities, in combination with development of oil and gas resources in the program area, would increase the potential for interactions between local residents and visiting workers, as well as the potential for conflicts in communities regarding their support for or opposition to these projects. Tensions between communities relating to differences in opportunities for increased economic activity, such as increased employment, and potential adverse sociocultural impacts, such as disruptions to subsistence levels, could strain social ties and reduce social cohesion. Income disparities or political differences in and between communities could also contribute to social tensions between residents and community institutions.

Development also could increase tensions between different community institutions from disagreements about land jurisdiction and management and differing priorities and agendas, resulting in additional strains on social cohesion. Such changes could worsen political differences between Iñupiat (Kaktovik) and Gwich'in (Arctic Village and Venetie) communities, potentially weakening social ties. If employment opportunities were to increase to the extent that fewer community residents have the time to engage in subsistence activities, then overall community harvests and participation could decrease, weakening the community's identity and association with the subsistence lifestyle (see **Section 3.4.3**) and causing reduced social cohesion and increased social problems. A countervailing impact of increased income through employment or dividends could encourage residents to remain in their home communities and provide financial support for subsistence activities in communities, thus strengthening the mixed subsistence cash economy.

Opening the Coastal Plain to oil and gas leasing would likely contribute to Gwich'in people's historic and intergenerational trauma and increase their distrust in government. Historical trauma is the accumulated effect of negative and traumatic experiences within a group of people which is passed on through generations (Stanford Medicine 2024). In the case of Alaska Natives, historical trauma can be traced to the impacts of colonial contact with Europeans and subsequent abuse, rape, murder, disease, starvation, dispersal of families (e.g., forcing children to attend boarding schools where they were punished for speaking their language), and forced abandonment of traditional values, religions, languages, and ways of being (Stanford Medicine 2024). Preliminary research has shown epigenetic markers on genes that are linked to trauma in Alaska Natives experiencing the "most intense symptoms of distress when reflecting on historic losses" (University of Illinois

Urbana-Champaign 2023). In particular, development of the program area would cumulatively increase trauma associated with the incremental loss of traditional and spiritually important lands over time, and a lack of Indigenous self-determination. Impacts to the health and abundance of the Porcupine Caribou Herd would further erode the Gwich'in's trust in the government's ability to be effective stewards of the land.

The cumulative impacts of the past, present, and reasonably foreseeable activities on economic organization are tied closely to cumulative impacts on subsistence. The study communities participate in a mixed subsistence-market economy. The increasing presence of development in and around study communities, in combination with the impacts of climate change on species availability and harvester access, may disrupt the economic organization of the community through changes in subsistence activities and participation in the cash economy. If subsistence activities or species are disrupted to the extent that overall harvests of subsistence species decline, then residents may begin to rely more heavily on wage employment and participate less in traditional subsistence activities.

Alternatively, increased income in the community, either through ANCSA corporation dividends or wage employment, may introduce a countervailing impact and provide more people with opportunities to participate in subsistence activities. This could affect residents who previously could not participate in subsistence activities due to a lack of equipment or money for fuel. Gwich'in communities would likely see few to no economic benefits from development of the program area, particularly the Gwich'in communities of Arctic Village and Venetie, which do not have ANCSA corporations. These communities may be more vulnerable to subsistence and sociocultural impacts due to the lack of countervailing economic benefits.

Infrastructure projects, including those cumulative impacts from the implementation of projects such as ASTAR, could result in greater public access to traditional hunting areas in the program area, particularly on the North Slope. This could result in even greater potential for interactions with non-Native individuals who may not share the same cultural values and respect for the land. Development of roads and other infrastructure may, however, introduce a countervailing impact of reduced costs of goods and services for local communities, thus encouraging residents to remain in their home communities.

Cumulatively, strong local economies could have positive social impacts as long as communities are able to adapt to such changes, while maintaining cultural traditions and values, such as subsistence, humility, respect for elders, family and kinship, and avoidance of conflict; however, while research has documented the resilience of subsistence-based economies, it has also made clear the vulnerability of rural communities to large-scale changes in subsistence species availability, harvester access, employment levels, income, and road access.

The cumulative impacts of past, current, and reasonably foreseeable actions on subsistence activities are discussed above, in **Section 3.4.3**. Subsistence activities are key to maintaining social ties within Indigenous communities, so any disruption to the hunting, harvesting, processing, distribution, and consumption of subsistence species would also have impacts on social organization in the community. The incremental construction of development-related infrastructure throughout traditional Inupiaq hunting and harvesting areas and in areas of cultural and traditional importance to the Gwich'in and Inuvialuit may erode their identity or cultural connection with those lands. This impact has already occurred in traditional use areas or camps in the Prudhoe Bay and Alpine areas, which are no longer accessible or usable by local residents.

Development of the program area would likely change subsistence and social systems, particularly for Kaktovik. If development of the program area reduces calving success for the Porcupine Caribou Herd and causes the availability of caribou from that herd or the Central Arctic Herd to decline overall, then cumulative

impacts on sociocultural systems could extend to other North Slope communities (Nuiqsut, Anaktuvuk Pass, Atkasuk, Utqiagvik), Alaskan Gwich'in communities (Venetie, Arctic Village, Beaver, Birch Creek, Chalkyitsik, Circle, Fort Yukon), and Canadian Gwich'in and Inuvialuit users of the Porcupine Caribou Herd (see **Section 3.4.3**). This would come about through direct changes in harvest success or reduced flows in sharing networks. In addition to reducing the flow of subsistence foods between communities, decreased sharing may also affect social and kinship ties between communities and regions.

Future development of large-scale oil and gas development projects would contribute to impacts on caribou including the Porcupine Caribou Herd, Central Arctic Herd, and TCH. It also could increase the likelihood of disrupting subsistence harvesting of caribou and other migratory species, such as waterfowl. This could be the case under such developments as Alaska LNG.

There also could be a gradual increase in developed areas on the North Slope through further development of the Prudhoe Bay/Kuparuk oil fields and the Alpine, GMT-1 and GMT-2, Nanushuk, and Willow developments to the west. If this occurs in communities not experiencing increases in income or employment levels, such as Alaskan Gwich'in and Canadian user groups, they could be more vulnerable to changes in subsistence harvests.

Development of offshore oil and gas resources in the Beaufort Sea would result in greater disruption to marine harvesting for the communities of Kaktovik and Nuiqsut, thus adding to the cumulative effects on subsistence. Widespread marine impacts, such as a large oil spill, could also affect subsistence uses for Inuvialuit user groups to the east, who harvest Arctic cisco, bearded seal, beluga whales, and polar bear that may pass through these waters.

Climate change will likely further contribute to impacts on subsistence activities and social systems. It would result in the following:

- Affect the availability of subsistence resources at traditional times and places
- Reduce access to traditional lands
- Degrade traditional hunting and camping areas from erosion of coastlines and riverbanks
- Cause greater risks to hunter safety and increased costs due to residents having to go farther to access resources or to travel in unsafe conditions

Alternatives that allow the most land to be developed in the program area and that have fewer timing and other restrictions are likely to have the greatest potential contribution to cumulative effects on subsistence species availability and therefore the greatest contribution to cumulative effects on sociocultural systems. This is because future post-lease activities would have a greater effect on subsistence uses and resources and the greatest likelihood of interactions with outsiders, while increasing regional or local economic activity; thus, Alternative B would have the largest contribution to cumulative effects on sociocultural systems, followed by Alternative C, while Alternatives D and D2 would have the smallest contribution to cumulative effects on sociocultural systems.

3.4.5 Environmental Justice

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the human environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and

stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain.

EO 12898 and EO 14096 directs federal agencies, to the greatest extent practicable and permitted by law, to achieve environmental justice by identifying and addressing disproportionately high and adverse human health or environmental effects of proposed federal actions on minority and low-income populations and on tribal populations. The NEPA analysis of environmental justice is also informed by CEQ guidance, as follows:

Under NEPA, the identification of a disproportionately high and adverse human health or environmental effect on a low-income population, minority population, or Indian [or Alaska Native] tribe does not preclude a proposed agency action from going forward, nor does it necessarily compel a conclusion that a proposed action is environmentally unsatisfactory. Rather, the identification of such an effect should heighten agency attention to alternatives (including alternative sites), mitigation strategies, monitoring needs, and preferences expressed by the affected community or population (CEQ 1997).

Federal agencies also are required to give affected communities opportunities to provide input into the environmental review process, including the identification of mitigation measures. The BLM has assured meaningful community representation in the process by holding public meetings in the communities of Kaktovik, Arctic Village, and Venetie, among others; coordinating directly with federally recognized tribal governments in compliance with EO 13175 and the BLM's Tribal Consultation policy, which has resulted in government-to-government meetings with relevant entities in Kaktovik, Arctic Village, and Venetie, among others, and ANCSA corporation consultation meetings with the KIC and the ASRC, among others; and having several tribal governments sign on for participation as cooperating agencies, including the Native Village of Kaktovik, Arctic Village Council, Venetie Village Council, and the Native Village of Venetie Tribal Government. **Section 4.3** of this SEIS provides a detailed description of the public and agency outreach that the BLM engaged in as it developed the Leasing SEIS, as required under NEPA.

The CEQ (1997) guidance states that an environmental justice analysis should recognize that the question of whether an agency action raises environmental justice issues is highly sensitive to the history or circumstances of a particular community or population. With respect to the current proposed action, the historical context in which environmental justice issues are considered is presented in the sociocultural systems analysis (**Section 3.4.4**). The BLM recognizes the interrelated cultural, social, occupational, historical, or economic factors that are likely to amplify the natural and physical environmental effects of oil and gas activities. The CEQ guidance also directs the BLM to consider any multiple or cumulative effects on human health and the environment, even if certain effects are not in the control or subject to the discretion of the agency (CEQ 1997).

The current environmental justice analysis determines whether the action would result in disproportionately high and adverse effects on environmental justice populations in the study area communities. The resource areas affected may include cultural resources, subsistence uses and resources, sociocultural systems, economy, and public health. Potential impacts on these resources are discussed in **Sections 3.4.2, 3.4.3, 3.4.4, 3.4.10, and 3.4.11**, respectively, and are not recapitulated in this section beyond brief summaries.

Alternative A

No potential environmental justice impacts are evident in the analysis of Alternative A. Specifically, subsistence uses, sociocultural systems, and public health and safety among the Iñupiat and Gwich'in would be unaffected by oil and gas development in the program area. Iñupiat and Gwich'in sociocultural systems

would likely continue to evolve due to existing forces of change. The economic conditions and the local, regional, and state level are expected to continue along current trends.

Impacts Common to All Action Alternatives

For all action alternatives, disproportionately high and adverse impacts on minority and low-income populations and Alaska Native tribal populations would occur primarily through potential decreases in the abundance or availability of subsistence resources. Given the historical and unique nature of the economic, social, and cultural value Alaska Natives place on subsistence activities (**Sections 3.4.3 and 3.4.4**) and the importance of these activities to the nutritional health and food security of Alaska Natives (**Section 3.4.11**), the adverse impacts of oil and gas development activities on subsistence resources in proximity to the program area are expected to be predominately borne by minority populations, and more specifically by Alaska Native households whose members directly harvest the resources themselves or acquire subsistence resources through exchange networks. As described in the affected environment description, nearly all of the study area communities are associated with federally recognized tribes. Moreover, impacts on subsistence resources are likely to affect lower-income residents of these communities disproportionately, as they are more dependent on subsistence resources and less capable of adapting to adverse impacts on these resources.

As noted above, the potential indirect impacts of oil and gas activities, namely exploration, development, production, and reclamation and abandonment (see **Appendix C**), on the resource areas that affect environmental justice issues are discussed in their respective sections. Provided below are brief summaries of these potential effects.

Cultural Resources

Development of a lease could lead to potential impacts to resources that the Iñupiat and Gwich'in hold as culturally important. These impacts could include physical destruction of or damage to all or part of a cultural resource, the removal of the resource from its original location, change in the character of the resource's use, the resource's dating potential, change to the physical features in the resource's setting (e.g., vibration, noise, visual, or olfactory) that contribute to the resource's importance and potential eligibility for the NRHP, or change in access to traditional use sites by traditional users.

While potential impacts on specific cultural resource sites would differ by alternative, broader cultural impacts on belief systems/religious practices would be common across all action alternatives. Particularly for the Gwich'in, who hold the program area as sacred ground to their culture, the presence of development in the program area would constitute a cultural impact.

Ongoing consultation with the tribes during the NEPA and Section 106 processes will continue to explore options for minimizing impact and developing mitigation measures for ethnographic resources. For cultural resource sites in the program area that could not be avoided or that would experience other direct and indirect effects outside the footprint, the impacts would be adverse, local, and long term.

Subsistence Uses and Resources

The primary factors associated with oil and gas development in the program area that may result in potential adverse impacts on subsistence resources and uses are noise, traffic, and human activity; infrastructure, including physical barriers; contamination; legal or regulatory barriers; and increased employment or income/revenue. These factors could reduce resource availability, resource abundance, and user access for residents of the study communities, which in turn would result in adverse economic impacts for those whose cost of living would rise as a result of needing to purchase alternative foodstuffs.

Kaktovik residents are the primary users of the program area and would therefore be most likely to experience potential direct adverse impacts on the abundance or availability of subsistence resources. Nuiqsut residents could experience potential direct and indirect adverse impacts associated with a decrease in the harvests of marine mammals, such as bowhead whales. Both Kaktovik and Nuiqsut, together with Arctic Village, Venetie, and other Alaska communities in the study area whose residents subsist in part on the Porcupine Caribou Herd and Central Arctic Herd, could experience indirect adverse impacts associated with a decline in the abundance or availability of caribou.

A potential increase in employment due to oil and gas development in the program area could cause a shift in subsistence roles in the community, as employed individuals may have less time to engage in subsistence activities. Alternatively, the increased income may provide more people with opportunities to participate in subsistence activities. These potential impacts would be most likely to occur for Kaktovik, which is most likely among North Slope villages to see an increase in employment and income from the proposed oil and gas leasing program; however, increased income resulting from ANCSA corporation dividends could extend throughout NSB communities.

Under all action alternatives, opportunities for subsistence users to participate in planning and decision-making to prevent unreasonable conflicts between subsistence uses and proposed activities would be provided.

Sociocultural Systems

The primary factors associated with oil and gas development in the program area that may result in potential impacts on sociocultural systems include: 1) changes in income and employment levels, 2) changes in available technologies, 3) disruptions to subsistence activities and uses, including activities and uses supporting mixed cash/subsistence economies, 4) influx of non-resident temporary workers associated with the oil and gas leasing program, and 5) influx of outsiders coming into the study communities. In addition, adverse sociocultural impacts associated with perceived or actual contamination or degradation of the Coastal Plain from development, particularly among the Gwich'in, would likely be similar under any alternative that includes leasing in the Porcupine Caribou Herd calving area.

An influx of cash into a small, rural community can have both beneficial and adverse impacts on sociocultural systems. Overall, however, future development in the program area would have potential lasting adverse effects on cultural practices, values, and beliefs through its impacts on subsistence.

Economy

Historically, very few North Slope residents participate in direct oil and gas activities in the North Slope; however, oil and gas development-related training programs geared toward developing special skills required in oil field services are expected to create more employment opportunities for residents of Kaktovik in particular, given the community's proximity to the region where oil and gas activities are likely to occur. In addition, local businesses in Kaktovik, including the KIC and its subsidiaries, could increase their economic activity from participation in oil and gas activities occurring during the exploration, development, and production of petroleum resources in the Coastal Plain. The City of Kaktovik would likely receive increased bed tax revenues with higher hotel occupancy, especially during initial development years (mobilization) and stakeholder engagement and industry community outreach. No population increase is expected in Kaktovik as a result of the project because future oil field workers would be housed in work camps at the CPFs and drill pads. Therefore, no increase in demand for local services and other public infrastructure is anticipated in Kaktovik.

Oil and gas development in the program area is expected to generate revenues to the NSB government, which often goes toward public services like education, health care, and critical infrastructure in NSB communities. In addition, as noted above, increased income resulting from ANCSA corporation dividends could extend throughout the NSB communities. In contrast to the NSB, the residents of the YKCA as a whole are not expected to experience beneficial economic impacts from the leasing program because the YKCA and other areas within Alaska's unorganized borough lack authority to levy taxes. Moreover, the Gwich'in communities of Arctic Village and Venetie are not enrolled in a regional Native corporation and do not have ANCSA village corporations. As such, those communities do not receive any increased economic activity associated with resource development or shares therein by ANCSA corporations.

Public Health

All action alternatives are likely to be below applicable air quality standards for all phases of a future development project. Water would be contaminated in the event of an accidental discharge; however, the likelihood of any such discharge occurring with the resultant human exposure is low, given the lease stipulations and ROPs around waste prevention, handling, disposal, spills, and public safety. If exposure were to occur, it would be likely short term and intermittent and unlikely to lead to significant health effects.

There is a low likelihood of contamination of subsistence food sources, with the possible exception of contamination through an oil spill or through contaminants mobilized through erosion or permafrost degradation. The history of oil and gas operations on the North Slope suggests a number of other potential oil and gas-related sources of contamination of subsistence foods (NRC 2003); however, the perception of contamination may result in stress and anxiety about the safety of subsistence foods and avoidance of subsistence food sources, with potential changes in nutrition-related diseases as a result. These health impacts (perceived or real) arise regardless of whether there is any contamination at levels of toxicological significance; the impacts are linked to the perception of contamination, not to measured levels.

Noise level increases from construction or operation of oil and gas facilities would result in potential effects, ranging from minor irritation and annoyance to more severe health outcomes. Given the likely location of development away from Kaktovik, individuals at cabins or camps near developments would be most affected. Until site-specific development activities are proposed, the extent of this effect is not possible to determine.

Increased income for Kaktovik households could improve health through increases in the standard of living, reductions in stress, and opportunities for personal growth and social relationships; however, experience with other oil and gas development in the NSB suggests that there is also the potential for an increase in social disruption (BLM 2012). If future oil and gas activities facilitate or promote outsider access into Kaktovik for reasons associated with development or otherwise, potential impacts could include increased social problems (for example, outsiders bringing in drugs and alcohol), lack of infrastructure to accommodate the increase in visitors (for example, lodging and transportation), and conflicts resulting from lack of knowledge or respect of traditional values. Oil and gas development may raise the already high risk of violence to Alaska Native women and girls.

Future oil and gas development in the program area could increase the risk of injuries and accidents during subsistence activities. Increasing use of roadways increases the risk of motor vehicle accidents and injuries; however, the likelihood of accidents on ice roads or in-field roads is low, given the lease stipulations and ROPs that address vehicle and roadway use.

Oil and gas development may have both beneficial and adverse impacts on the mental health of residents of communities in the affected area. The potential for increased revenue and employment may reduce stress and

anxiety, but concerns about environmental contamination, potential impacts on subsistence access and resource availability, health impacts from spills, and other impacts from development, both real and perceived, could increase stress and disease susceptibility for some residents.

Alternative B

Cultural Resources

Under Alternative B, the types of potential impacts on cultural resources would be the same as those described in *Impacts Common to All Action Alternatives*. Alternative B would make available the largest number of acres for potential leasing and development; therefore, in terms of direct and indirect impacts on cultural resource sites, Alternative B could affect the greatest number of documented sites. In addition, because Alternative B has the smallest setbacks from areas of highest potential for containing undocumented cultural resources, such as rivers and coastline, this alternative would have the highest likelihood for affecting undocumented resources. Potential impacts on cultural resource sites would be adverse and long term for sites that could not be avoided or would experience direct and indirect effects outside the footprint.

Subsistence Uses and Resources

Under Alternative B, the types of potential impacts on subsistence uses and resources would be the same as those described in *Impacts Common to All Action Alternatives*. Alternative B would result in the greatest potential impact on Porcupine Caribou Herd calf survival and overall herd numbers, due to the amount of lands available for oil and gas leasing. As discussed above, the Porcupine Caribou Herd is a subsistence resource of importance to the closest communities of Kaktovik, Nuiqsut, Arctic Village, and Venetie and of other Alaska communities in the study area. Alternative B would include 0.5- to 1-mile setbacks (with no permanent oil and gas infrastructure, including roads and pipelines, allowed) for eight major rivers, many of which, such as the Hulahula, Okpilak, and Jago rivers, are key drainages used for subsistence activities. Some TLs on human activity would be in place for calving and post-calving habitats of the Porcupine Caribou Herd, which would reduce adverse impacts on subsistence resource abundance and availability.

Sociocultural Systems

Under Alternative B, the types of potential impacts on sociocultural systems would be the same as those described in *Impacts Common to All Action Alternatives*. Because of its proximity to the program area, the community of Kaktovik would experience the greatest intensity of potential sociocultural effects such as changes in income and employment levels, changes in available technologies, and influx of nonresident temporary workers associated with the oil and gas leasing program. In addition, potential impacts on sociocultural systems in all the study area communities would occur if oil and gas development in the program area results in a decline in subsistence resource abundance or availability, particularly of caribou. Given the spiritual and cultural importance of the Porcupine Caribou Herd to Gwich'in communities, including Arctic Village and Venetie, any disruption to that herd or contamination or degradation of calving grounds in the program area would have a particularly adverse sociocultural impact on the Gwich'in in terms of their sharing networks, belief systems, and cultural identity.

Economy

While potential economic effects under Alternative B would be similar to those discussed in *Impacts Common to All Action Alternatives*, there would be unquantifiable differences in economic effects due to the ROPs associated with the various lease stipulations under Alternative B. Some of these actions could result in delays in exploration, development, and production; therefore, this would also delay potential employment and income effects, as well as revenues that would otherwise accrue to the local, State, and federal governments.

Public Health

Under Alternative B, the types of potential impacts on public health would be the same as those described in *Impacts Common to All Action Alternatives*. Potential threats to subsistence activities and harvest patterns are a primary source of ongoing stress in Alaska communities in the study area. Avoidance of productive subsistence areas due to perceived contamination of subsistence foods may reduce harvests and worsen dietary and nutritional outcomes, independent of any potential direct impact on the animals themselves. In particular, reductions in the success of subsistence harvests for Arctic Village and Venetie residents could cause a shift from subsistence resources to store-bought foods, worsening nutritional outcomes and food insecurity.

Alternative C

Cultural Resources

Compared to Alternative B, Alternative C would make available a smaller number of acres for potential leasing and development. In terms of potential direct and indirect impacts on documented cultural resource sites, therefore, Alternative C would affect a fewer number of sites. In addition, because Alternative C has a larger setback (compared to Alternative B) from areas of highest potential for containing undocumented cultural resources, such as rivers and coastline, this alternative would have a lower likelihood for affecting undocumented resources. Potential impacts on cultural resource sites under Alternative C would be of lower intensity than under Alternative B and would be adverse and long term for sites that could not be avoided or would experience direct and indirect effects outside the footprint.

Subsistence Uses and Resources

The types of potential impacts under Alternative C would be the same as those described under Alternative B; however, under Alternative C, lease sales on Porcupine Caribou Herd calving grounds would be more limited than under Alternative B; therefore, adverse effects on calf survival and overall herd numbers would be lower than Alternative B. Alternative C also includes larger setbacks from key subsistence drainages than other action alternatives, including 4 miles of the Hulahula and 3 miles of the Okpilak Rivers, which would greatly reduce potential impacts on subsistence in those areas, particularly during the winter.

Furthermore, no pads or CPFs would be allowed within 2 miles of the coast, reducing potential impacts on coastal subsistence hunters and anglers. In addition, reclamation of infrastructure would be an ongoing process for each development area, thus lessening the duration of impacts for individual developments related to infrastructure. Alternative C would include additional design features meant to address impacts on subsistence resources and users.

As a result of these lease stipulations and ROPs, the intensity of the impacts of Alternative C on subsistence resources of importance to the residents of Kaktovik, Nuiqsut, Arctic Village, Venetie, and other Alaska communities in the study area would be lower than under Alternative B.

Sociocultural Systems

Because of increased caribou calving grounds avoidance and because more lands would be subject to development restrictions, the intensity of potential sociocultural impacts under Alternative C would be less than under Alternative B.

Economy

The potential economic effects under Alternative C are anticipated to be similar in nature but smaller in magnitude compared to the economic effects under Alternative B due to higher levels of restrictions. The higher level of restrictions could reduce the number of facilities developed and the amount of oil produced,

and therefore could defer or reduce potential government revenues and taxes, and also result in lower employment and income effects.

Public Health

Given the additional protection for caribou, Alternative C would decrease the potential for impacts on the subsistence resources of importance to the residents of Kaktovik, Nuiqsut, Arctic Village, Venetie, and other Alaska communities in the study area; therefore, the likelihood and severity of health impacts from reduced subsistence harvests, increased reliance on store-bought food, and food insecurity.

Monitoring contaminants in subsistence foods would help address subsistence user concerns related to contaminants and identify potential human health issues.

Alternative D

Cultural Resources

Compared to Alternatives B and C, Alternative D would make available a fewer number of acres for potential leasing and development and therefore, in terms of potential direct and indirect impacts on documented cultural resource sites, Alternative D would affect a fewer number of sites. In addition, because Alternative D has the largest setbacks from areas of highest potential for containing undocumented cultural resources, such as rivers and coastline, this alternative would have a lower likelihood for affecting undocumented resources. Potential impacts on cultural resource sites under Alternative D would be of lower intensity than under Alternative B but would be adverse and long term for sites that could not be avoided or would experience direct and indirect effects outside the footprint.

In addition to the ROPs already proposed under Alternatives B and C, Alternative D includes additional language related to the Coastal Plain's Section 106 programmatic agreement (ROP 29) and cultural awareness training and orientation that is designed in coordination with local traditional knowledge experts.

Subsistence Uses and Resources

The types of potential impacts under Alternative D would be the same as those described under Alternatives B and C. However, under Alternative D lease sales on calving grounds would be more limited than under Alternatives B and C; therefore, adverse effects on calf survival and overall herd numbers would be lower than Alternatives B and C. Alternative D also includes setbacks from key subsistence drainages, including 4 miles for the Hulahula River and 1 mile for the Sadlerochit River, which would greatly reduce impacts on subsistence in those areas, particularly during the winter. However, the setback from the Okpilak River, a highly used subsistence area, would be 0.5 mile under Alternative D, as compared to 1 mile under Alternative B and 3 miles under Alternative C.

Alternative D provides more protections for avian and fish habitat than Alternatives B and C. Under Alternative D, seismic exploration would be limited to areas available for lease sale, thus reducing the area of effect associated with seismic disturbances for resources such as fish, waterfowl, furbearers, and marine mammals in the nearshore environment.

Under Alternative D, no pads or CPFs would be allowed in nearshore waters, lagoons, or barrier islands. Other infrastructure would be allowed only as permitted by the BLM Authorized Officer in coordination with Tribal governments, reducing potential impacts on coastal subsistence hunters and anglers. Alternative D would require additional design features, including caribou monitoring, traditional knowledge, and contamination studies, meant to address impacts on subsistence resources and users. In addition, Alternative D would

increase coordination with Tribal governments throughout the exploration, development, and monitoring processes.

As a result of these lease stipulations and ROPs, the intensity of the impacts of Alternative D on subsistence resources of importance to the residents of: Kaktovik, Nuiqsut, Arctic Village, Venetie, and other Alaska communities in the study area, would be lower than under Alternatives B and C.

Sociocultural Systems

Because of increased caribou calving grounds avoidance, and because more lands would be subject to development restrictions, the intensity of potential sociocultural impacts under Alternative D would be less than under Alternatives B and C.

While the intensity of impacts related to caribou availability and subsistence impacts would be lessened under Alternative D, other sociocultural impacts associated with changes in income and employment would likely be similar under any action alternative, and they would be most likely to affect the community of Kaktovik.

Economy

As in Alternative C, Alternative D would have additional restrictions on development in the Coastal Plain area. The potential economic effects under this alternative, therefore, would be smaller in magnitude compared to Alternatives B and C. These additional restrictions could result in fewer facilities developed and less oil produced, and, therefore, they could defer or reduce potential government revenues and taxes resulting in lower employment and income effects, relative to the potential economic effects under Alternatives B and C.

Public Health

The types of potential impacts on public health and safety under Alternative D would be the same as those described under Alternatives B and C. However, levels of magnitude and duration would be lower by comparison. In particular, given the additional protection for caribou, Alternative D would decrease the potential for impacts on the subsistence resources of importance to the residents of Kaktovik, Nuiqsut, Arctic Village, Venetie, and other Alaska communities in the study area; therefore, the likelihood and severity of health impacts from reduced subsistence harvests, increased reliance on store-bought food, and food insecurity.

As under Alternative C, monitoring contaminants in subsistence foods would help address subsistence user concerns related to contaminants and identify potential human health issues. Under Alternative D, this monitoring would be coordinated with Tribal Governments to incorporate Indigenous knowledge of contaminants to subsistence foods, when available.

Alternative D2

Cultural Resources

Alternative D2 would make available the fewest number of acres for potential leasing and development and, therefore, in terms of potential direct and indirect impacts on documented cultural resource sites, Alternative D2 would affect the fewest number of sites. In addition, compared with Alternative B, Alternative D2 includes greater setbacks from areas of highest potential for containing undocumented cultural resources, such as rivers and coastline. Potential impacts on cultural resource sites under Alternative D2 would be of lower intensity than under Alternative B but would be adverse and long-term for sites that could not be avoided or would experience direct and indirect effects outside the footprint.

In addition to the ROPs already proposed under Alternatives B and C, Alternative D2 includes additional language related to the Coastal Plain's Section 106 programmatic agreement (ROP 29) and cultural awareness training and orientation that is designed in coordination with local traditional knowledge experts.

Subsistence Uses and Resources

The types of potential impacts under Alternative D2 would be the same as those described under Alternatives B, C, and D. However, Alternative D2 would have the least impact on subsistence uses and resources of all the action alternatives because the larger area not offered for lease sale would limit the potential for direct impacts on subsistence users, species, and habitat to the smallest area. Potential impacts would be lowest under Alternative D2 for most subsistence resources including fish, waterfowl, terrestrial mammals including caribou, and marine mammals.

Similar to Alternative D, Alternative D2 includes setbacks from key subsistence drainages, including 4 miles for the Hulahula River and 1 mile for the Sadlerochit River, which would greatly reduce impacts on subsistence in those areas, particularly during the winter. However, the setback from the Okpilak River, a highly used subsistence area, would be 0.5 mile under Alternative D2, as compared to 1 mile under Alternative B and 3 miles under Alternative C.

Similar to Alternative D, no pads or CPFs would be allowed in nearshore waters, lagoons, or barrier islands under Alternative D2. Other infrastructure would be allowed only as permitted by the BLM Authorized Officer in coordination with Tribal governments, reducing potential impacts on coastal subsistence hunters and anglers. Alternative D2 would require additional design features, including caribou monitoring, traditional knowledge, and contamination studies, meant to address impacts on subsistence resources and users. In addition, Alternative D2 would increase coordination with Tribal governments throughout the exploration, development, and monitoring processes.

As a result of these lease stipulations and ROPs, the intensity of the impacts of Alternative D2 on subsistence resources of importance to the residents of: Kaktovik, Nuiqsut, Arctic Village, Venetie, and other Alaska communities in the study area, would be the lowest across all the action alternatives.

Sociocultural Systems

Alternative D2 would allow surface occupancy on the fewest acres that have high or moderate overlapping subsistence use. In addition, because of increased caribou calving grounds avoidance, and because more lands would be subject to development restrictions, under Alternative D2, this alternative would be the least likely to affect calf survival, overall herd numbers, and herd migration and movement. Therefore, Alternative D2 would reduce the intensity and likelihood of effects on Iñupiat, Inuvialuit, and Gwich'in sociocultural systems.

While the intensity of impacts related to caribou availability and subsistence impacts would be lessened under Alternative D2, other sociocultural impacts associated with changes in income and employment would likely be similar under any action alternative, and they would be most likely to affect the community of Kaktovik.

Economy

Alternative D2 would have even more restrictions and stipulations compared to Alternative D. As a result, the magnitude of potential economic effects (government revenues, jobs, and income) under Alternative D2 would be lower compared to all the other action alternatives.

Public Health

Compared with all other action alternatives, Alternative D2 would result in the lowest impacts on health and safety because the alternative would have the least impact on subsistence uses and resources.

As under Alternatives C and D, monitoring contaminants in subsistence foods would help address subsistence user concerns related to contaminants and identify potential human health issues. Under Alternative D, this monitoring would be coordinated with Tribal Governments to incorporate traditional knowledge of contaminants to subsistence foods, when available.

Transboundary Impacts

While transboundary impacts are addressed in other sections of this EIS, they are not included in this environmental justice analysis section, which is based on the requirements and guidelines associated with EO 12898 and EO 12898. That EO specifically applies to “identifying and addressing, as appropriate, disproportionately high and adverse human health or environmental effects of [federal agency] programs, policies, and activities on minority populations and low-income populations in the United States and its territories and possessions, the District of Columbia, the Commonwealth of Puerto Rico, and the Commonwealth of the Northern Mariana Islands.”

Cumulative Impacts

The leasing program and post-leasing activities would likely contribute to potential cumulative impacts on environmental justice populations in the study area communities in a variety of ways across the subsistence, sociocultural, economic, and public health spectrum. These impacts are discussed in **Sections 3.4.2, 3.4.3, 3.4.4, 3.4.10, and 3.4.11** and are summarized below. Alternatives that allow the greatest amount of land to be developed and which have fewer timing and other restrictions would provide the greatest potential contribution to adverse cumulative effects on environmental justice populations in the study area communities. This is because they would have the greatest likelihood of disruptions to subsistence activities and interactions with outsiders; thus, Alternative B would have the largest incremental adverse effects on environmental justice populations in the study area communities, followed by Alternative C, while Alternatives D and D2 would have the smallest incremental adverse effects on environmental justice populations in the study area communities.

Cultural Resources

Past, present, and reasonably foreseeable future activities, in combination with oil and gas development in the program area, would increase the potential for cultural resource impacts, both directly on specific cultural resource sites and other ethnographic resources. The types of effects include destruction or possible disturbance of undocumented cultural resources, added noise and visual effects on cultural resources and traditional use areas, and fragmentation of culturally important areas by reducing access and by changes in local resource availability.

Subsistence Uses and Resources

Cumulative impacts on subsistence due to climate change and development activities would alter subsistence use areas, user access, and resource availability for subsistence users in the study area communities. Over time, changes in how residents access and use the land and reduced opportunities for participation in subsistence harvesting, processing, distribution, and celebrations from decreased harvests would have adverse effects on culture by weakening social ties and knowledge of cultural traditions.

Sociocultural Systems

Past, present, and reasonably foreseeable future activities, in combination with oil and gas development in the program area, would increase the potential for sociocultural impacts on environmental justice populations in the study area communities, including changes in income and employment levels, changes in available technologies, disruptions to subsistence activities and uses, and increased interactions with outsiders. Cumulatively, communities with strong local economies, including active mixed cash/subsistence economies, are expected to experience beneficial sociocultural impacts, as long as the communities are able to adapt to such changes, while maintaining cultural traditions and values. Communities that are most likely to experience adverse sociocultural impacts would be those that experience disruptions to subsistence activities from oil and gas development, including subsistence activities supporting mixed cash/subsistence economies, while not having increased income or employment opportunities. The Gwich'in communities of Arctic Village and Venetie are likely the most vulnerable to subsistence and sociocultural impacts due to the lack of countervailing economic benefits.

Climate change will likely further contribute to impacts on subsistence activities and social systems by affecting the availability of subsistence resources at traditional times and places, reducing access to traditional lands, degrading traditional hunting and camping areas from erosion of coastlines and riverbanks, and causing greater risks to hunter safety and increased costs due to residents having to go farther to access resources or to travel in unsafe conditions.

Economy

The oil and gas leasing program and subsequent exploration, development, and production in the program area would increase oil and natural gas production on the North Slope and increase TAPS throughput. Economic activity would increase at the local, regional, and state level due to direct industry spending on labor, materials, and services. Government revenues would increase from shared royalties, tax payments such as property taxes, corporate income taxes, severance taxes, and other local taxes. Job opportunities would increase for Alaskans, including residents of communities in the NSB. Labor income would increase in regions where industry spending would occur and where the oil and gas workforce resides.

Public Health

As noted in **Section 3.4.11**, for most past, present, and reasonably foreseeable future projects, the village of Kaktovik and its residents have been buffered by surrounding undeveloped lands. Air and water quality in and around the village remains good, and the influx of oil and gas revenue for the NSB has improved infrastructure in the village. Future development offshore in the Beaufort Sea could increase the risk of accident and injury for hunters by disrupting subsistence harvest patterns and requiring more time on the water to harvest animals. Other risks for accident and injury include unpredictable weather and sea ice conditions associated with climate change. The onshore leasing alternatives would have similar contributions to the cumulative effects on public health for Kaktovik residents.

As discussed in **Section 3.4.3**, cumulative impacts on subsistence could alter subsistence use areas and availability for subsistence users in the study area communities, including alterations of migration patterns and changing weather patterns from climate change. Over time, reductions in subsistence harvests could have an adverse effect on diet and nutrition and could accelerate the transition from a subsistence-based diet to one that includes a higher proportion of store-bought food. The effects of climate change described under Affected Environment, above, could influence the rate or degree of the potential cumulative impacts.

Continuing economic development and increasing revenues to the local governments under all action alternatives would support maintenance of Kaktovik infrastructure and systems. The potential direct and indirect employment resulting from oil and gas exploration and development, combined with the government and ANCSA corporation revenues, are all major contributors to the positive health changes in the NSB over the last few decades. The future oil and gas activities under all action alternatives would contribute to these ongoing changes, with greater levels of employment generally being more likely to be associated with good health.

3.4.6 Recreation

Direct and Indirect Impacts

The reasonably foreseeable development scenario (**Appendix C**) identifies five phases associated with the hypothetical baseline scenario: leasing, exploration, development, production, and abandonment and reclamation. In the leasing phase under the directives of Section 20001(c)(1) of PL 115-97, there would be no direct impacts on the environment. This is because, by itself, a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. As such, oil and gas development, particularly exploration, development, and production, may affect recreation through seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on recreation from on-the-ground activities.

Potential impacts on recreation would result from management that enhances or diminishes the quality of the recreation setting, limits access or physically displaces visitors or non-federally qualified subsistence users because of new surface disturbance or development, increases or decreases conflicts between recreation uses, such as in high use areas, increases or decreases the ability of commercial operators to carry out specially permitted activities, or enhances or diminishes subsistence opportunities. The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Additionally, impacts on recreation can be inferred based on the potential for oil and gas activities within the vicinity of the priority recreation areas defined above. Therefore, the methodology for analysis of impacts on recreation is directly related to the proximity and overlap of priority recreation areas with areas available for leasing (not subject to surface use restrictions, such as NSO or CSU). NSO and CSU are applied to provide protections to important resources, which can include recreational values, therefore, it is assumed that these protections would reduce impacts.

Alternative A

Under Alternative A, no oil and gas leasing program would take place in the program area; there would be no potential direct or indirect impacts on recreation from oil and gas activities in the program area.

Impacts Common to All Action Alternatives

The magnitude, spatial extent, and duration of potential impacts on recreation would vary, based on season, type of recreation, location in the program area, and phase of the development. In general, the potential for impacts on recreation would be greatest during the summer and fall, when weather and daylight conditions allow for the greatest number and type of recreation uses. Similarly, the potential for impacts would be greatest along river corridors, the Beaufort Sea coastline, and other priority recreation areas (defined above) where the number of recreation users is highest. Exploration and development within or near priority recreation areas

could result in changes to recreation access, recreation setting, and the overall recreation experiences in the program area. This includes changes in scenic quality, lights, noise, wildlife movement, and other values that are key to the remote and natural setting that attracts visitors to the area. Because visitors to the program area generally expect a physical setting consisting of little to no human disturbance and a social setting with little to no interaction with other visitors or human activity, small changes to the physical and social setting can have disproportionately large impacts on user experiences.

The five phases of development would vary the magnitude, area extent, and duration of impacts. Under the leasing phase, there would be no impacts because a lease itself does not authorize any on the ground oil and gas activities. Under the exploration phase, impacts would be dispersed along lease areas. This is because activities are intended to identify potential prospects and would occur for approximately 4 years (see **Appendix C**). Only Lease Stipulation 4, prohibiting surface-disturbing activities along nearshore marine, lagoon, and barrier islands, would apply under the exploration phase of the hypothetical baseline scenario. An additional impact of the exploration phase would be the increased use of landing spots that are also, or in the vicinity of, priority recreation areas.

In the exploration, development, and production phases, some recreation opportunities could be displaced. The potential for displacement and conflict is greater if priority recreation areas overlap with oil and gas operations. Oil and gas activities in proximity to priority recreation areas would change the recreation setting by introducing visual and auditory changes to the landscape and minimizing the feeling of remoteness. The key values of the recreation setting include scenic views of a remote, natural landscape, with limited noise or other evidence of human activity.

Though access to lands for exploratory operations varies by alternative, seismic exploration and supporting activities could degrade the recreation setting. Under the development phase, impacts would be concentrated along areas identified as viable prospects for development and are expected to last for approximately a year. While impacts may be more concentrated, activities to support construction, such as creating roadway infrastructure, may extend from the prospected location; however, under the development phase, NSO lease stipulations attach and vary by alternative.

Under the production phase, the dispersion of impacts would likely be reduced, as activities would be operational. Infrastructure constructed during development would affect the visual landscape, would prevent recreation in some areas, and could diminish the quality of recreation. Finally, under the abandonment and reclamation phase, approximately 85 years after initial lease sale, impacts would result from removing retired equipment and plugging wells that are no longer economically viable.

Protective measures intended to limit ground disturbance and associated impacts on resources would impact recreation less by limiting or prohibiting surface-disturbing activities that could diminish the quality of recreation experiences, conflict with recreation opportunities, or displace visitors and non-federally qualified subsistence users. The magnitude of potential impacts on recreation would be directly related to the type and extent of proposed lease stipulations or ROPs under each alternative.

While, during the exploration phase, surface development would not be allowed along nearshore marine, lagoon, and barrier island habitats only, other protective measures would prevent the construction of infrastructure on acres identified with NSO stipulations. Production infrastructure, expected to last at least 85 years, would be built only on areas open to lease sales that are subject to STC. In general, maintaining or improving resource conditions increases the quality of recreation (Dorwart et al. 2009).

The program area offers recreationists remote recreation experiences, such as recreational rafting, pack rafting, expedition-length float hunts, and polar bear viewing, that depend largely on the physical setting. The intrusion of infrastructure into the remote setting of the program area would generally detract from the recreation experience, particularly where infrastructure and recreation overlap, and where there is the potential for visual and auditory changes. The visual quality of undisturbed landscapes contributes to a higher-quality recreation experience, and disturbed landscapes may affect the desirability of recreation in the program area and displace recreation to areas outside the Coastal Plain, such as the Kongakut River, exacerbating visitor dissatisfaction in an area already grappling with perceived crowding by some visitors. Protective measures attached to leases beginning in the development phase of the hypothetical baseline scenario, such as NSOs, which prevent surface disturbance and the placement of aboveground infrastructure, would eliminate the potential for changes to visual quality and associated physical setting. Where aboveground development is allowed, lease stipulations that minimize the visual contrast of new development, such as by requiring design elements that complement the predominant natural features of the characteristic landscape, would reduce the intensity of visual impacts and associated change to the recreation setting.

The potential addition of artificial lighting at oil and gas facilities and from vehicles would diminish the quality of night sky conditions, especially in the winter and spring, when daylight hours are shortest. Diminished night sky conditions during the winter and spring would affect fewer visitors, compared with daytime visual impacts. This is because there are fewer visitors to the program area during that time of year; however, those that do visit in winter and spring often do so to view and photograph the night sky. Any new artificial light would result in a potential impact on those visitor experiences because there are very few artificial light sources currently in the program area. Artificial light also has the potential indirect impact of reducing visitors' ability to observe the Northern Lights. Similarly, future artificial lighting during the limited nighttime hours in the summer and fall would result in a short but intense impact, which could diminish the overall quality of visitor experiences.

Under the exploration and development phases, artificial lighting would likely be dispersed along the program area during supporting activities, such as the construction of exploration wells or site infrastructure. During the production phase, impacts would be more concentrated along established infrastructure to support production operations; however, during the production phase, there is also the potential from artificial lighting impacts from gas flaring. Such impacts could disrupt the visual quality of the program area and would be greatest during night sky conditions. See **Section 3.4.8**, Visual Resources, for a description of visual impacts on the program area.

Protective measures that prevent the placement of aboveground infrastructure or that specify the use of downcast lighting or other light trespass mitigation measures would minimize impacts on the quality of nighttime recreation.

The magnitude of potential impacts on the recreation setting from visual quality, including night skies, would decrease, relative to users' increasing distance from the source of any visual impact or artificial light; however, the relatively flat topographic characteristics of the program area would result in new mineral development infrastructure being visible from far distances. Also, because there is no development currently, any new development that would be visible to recreation users would modify the recreation setting and visitor experiences.

The exploration, development, production, and abandonment and reclamation phases of oil and gas development would be particularly noticeable from elevated vantage points. Even with protective measures to minimize potential visual impacts, surface disturbance and infrastructure development would modify the

existing character of the landscape, diminish visual quality, and directly affect the quality of the recreation setting and associated experiences. The intensity and duration of the impact would depend on the phase, type, and location of the development, relative to recreation opportunities.

Noise from mineral development following a lease sale would modify the recreation setting and could potentially diminish visitor experiences. Noise would likely increase during the exploration and development phases of oil and gas activities, as impacts would be dispersed through the leased areas from supporting activities related to exploration and construction. During the production phase, noise would be specific to the prospected location; however, noise impacts would last approximately 85 years.

Noise impacts would likely increase during the abandonment and reclamation phase, as vehicles and supporting activities would be accessing the area. The magnitude of impacts depends on the distance between the observer and the noise source, the duration and frequency of the noise, the time at which the noise occurs, the presence of topographical features or vegetation that decreases noise, and the lease stipulations or mitigation strategies that reduce noise levels. The use of compression technology would increase the noise levels associated with mineral production. More frequent aircraft and ground-based vehicle trips could also increase the occurrence of noise impacts from those sources. Potential noise impacts on recreation would diminish farther from the source because noise diminishes with distance.

Lease sales resulting in future mineral exploration and production and associated pipelines, private roads, mineral material sites, and other infrastructure can physically displace recreation opportunities and alter access to areas for recreation.

The magnitude and type of potential impacts would depend on the location of the development and recreation activity affected. The potential for impacts would be greatest during the summer and fall when visitation is highest and near river corridors and other areas where visitors concentrate; however, permanent infrastructure would displace all types of visitors year-round and over the long term. Currently, recreationists are allowed to access all areas of the Coastal Plain that are Refuge lands; the development of mineral-related infrastructure may preclude those opportunities. Development of new roads would be available only for private industry and subsistence use (see **Section 3.4.9**, Transportation). This would disrupt the recreation setting by introducing linear intrusions to the visual landscape, increasing the amount of engine noise from road usage, and degrading the untouched quality of the program area.

Overland heavy equipment vehicle use for exploratory seismic work could displace winter users when the equipment is in use. The locations where seismic exploration would occur varies by alternative. In addition to noise and artificial light, over-snow heavy vehicles used for seismic work can leave grid lines on the landscape visible by aircraft passengers following snow melt. This is the result of compacted snow melting slower than surrounding areas, creating darker vegetation patterns matching the gridlines used for the seismic work. In the summer and fall, for visitors arriving by air, or where the grid lines are visible from elevated areas, this modification would influence visitor perceptions of the program area's setting. Once they are on the ground or in equal elevation to the grid lines, there would be potential impacts on visitor experiences.

Recreationists in the program area rely heavily on commercial operators for access to desired recreation opportunities and experiences. Priority recreation areas that are utilized for commercial recreation operations and access may be in conflict with oil and gas activity. Additionally, changes in resource conditions, including physical resources, such as visual quality, and biological conditions, such as wildlife, would directly influence the quality of recreation experiences obtained through commercial operators. For example, mineral development in leased areas that relocates or decreases polar bear or caribou populations would diminish the

ability of operators to provide clients with desired recreation experiences. This could lessen the viability of certain operations, resulting in fewer permitted operators, which would indirectly affect recreation by potentially reducing access to the program area via specially permitted means. Another potential indirect impact of reduced access to the program area is recreationists being displaced to areas outside of the program area.

Alternative B

Under Alternative B, 1,563,500 acres (100 percent of the program area) are available for lease sales, 77 percent of which (1,205,400 acres) would be available for surface use. This would result in potential direct and indirect impacts on recreation throughout nearly the entire program area. The types of impacts described under *Impacts Common to All Action Alternatives* would result from lease sales that would be followed by the construction and operation of drill pads, CPFs, gravel roads, pipelines, STP, and gravel pits to support mineral development. Seismic exploration would be allowed across the entire program area. As a result, impacts on the recreation experience and setting from seismic exploration would be widely dispersed, increasing the potential for conflicts between exploration and recreation activities. Additionally, under Alternative B, an estimated 2,000 acres of surface disturbance would occur to support oil and gas activities across the program area. This could result in some displacement of recreation opportunities, but the visual and auditory changes would occur across a larger area and potentially have greater impacts on recreation experiences and opportunities if developments could be seen from distance and noise travels across the program area. The area of total surface disturbance, coupled with the amount of land available for surface use (see above), could degrade the recreation setting on a large extent if development is dispersed relatively evenly.

Over time as exploration, well pad development, road construction, and extraction occur, there would be a steady decline in the recreation setting from changes to the visual quality and night sky, compared with Alternative A. The untouched and natural quality of the viewshed would be reduced due to oil and gas development and operations. Noise from construction, production, aircraft, and vehicles would also diminish the quality of the local recreation setting (see **Section 3.2.3**, Acoustic Environment). With the intensification of development through the construction and production phases, there would be a steady increase in surface disturbance, which would increase the potential for visitor displacement and restrictions on access for visitors and non-federally qualified subsistence users. New roads would create up to 208 miles of dispersed, linear barriers. Year-round vehicle traffic on the roads would contribute to noise, visual, and light-related impacts on the recreation uses that occur in the program area.

There are ten priority recreation areas within the program area, defined as locations where permitted air operators land to drop off or pick up recreationalists (nine total) plus the Hulahula River. All ten are within the area available for lease under Alternative B, however, nine of these priority recreation areas are in areas subject to NSO, while one is in an area subject to TL. Impacts on priority recreation areas within NSO are likely to be minimal, as there would be no surface use for oil and gas activities to cause visual or auditory intrusions or disruptions in recreational use due to multiple uses, including overlapping use of landing locations for access.

One-mile setbacks from the Canning, Hulahula, and Jago Rivers, and narrow setbacks for other rivers that serve as primary recreation use areas, would potentially directly impact the recreation setting and visitor experiences as described above. The narrow setback would provide little opportunity for vegetation or topography to provide consistent screening of new facilities or vehicle traffic from view of users in the river corridors; most vegetation along rivers in the program area are short, scrubby brush. The intensity of the impact would depend on structure height, topography, and vegetation that influence a user's line of sight from

the river corridor. Drill pads, roads, and pipelines near these river corridors would also physically displace visitors from areas outside the setbacks. Concentrating recreation uses in narrow river corridors would increase the density of activity in those corridors, compared with Alternative A, which would increase the number of interactions among visitors. This would directly affect the social setting and could increase the potential for conflicts among different types of recreation users.

The long-term or permanent degradation of the program area's remote recreation setting could result from not requiring final abandonment to meet minimal standards for WSR designation, not restoring general wilderness characteristics of the area, such as the absence of evidence of human impacts, and allowing exceptions to abandonment conditions. There would be no specific protection measures to minimize disturbance in polar bear denning critical habitat, which could result in potential species displacement or decline. Over time, fewer species would result in fewer viewing opportunities, which would lessen the viability of commercial operators providing guided polar bear viewing experiences. This could reduce the number of specially permitted operators and indirectly limit future opportunities for visitors to experience polar bears outside of captivity.

Minimal protection measures for development in caribou summer, calving, and post-calving habitat areas could lead to displacement and possible decline in caribou populations, which would decrease hunting and viewing opportunities. Potential impacts on caribou populations would also indirectly affect the viability of commercial recreation uses that provide guided hunting and viewing opportunities. Fewer operators would result in an overall decline in opportunities to access the program area for recreation.

Alternative C

Potential impacts on recreation under Alternative C would be similar to those described under Alternative B. The exception would be that, under Alternative C, making 1,037,200 acres (66 percent of the program area) available for leasing, of which 708,200 acres (45 percent of the program area) would be NSO, would largely concentrate the *Impacts Common to All Action Alternatives* described above into a smaller portion of the program area. Compared with Alternative A, the greatest potential for impacts would be in the 329,000 acres (21 percent of the program area) available for leasing with surface use. Seismic exploration would only be allowed in areas available for lease, which would limit impacts on the recreation setting, as described in *Impacts Common to All Action Alternatives*. Additionally, an estimated 1,464 acres of surface disturbance would occur, which would reduce overall surface disturbance and dispersion of impacts on recreation experiences and opportunities as compared to Alternative B.

The intensity of impacts would be similar to those described under Alternative B; however, Lease Stipulations 7 and 8, and a larger NSO area from Lease Stipulations 1, 4, 7, and 9 under Alternative C would result in potential impacts being experienced over a smaller area than under Alternative B. This would better protect the unique qualities, such as the views and sounds of an undisturbed Alaskan landscape, that are so important to the recreation setting.

There are eight priority recreation areas, including seven landing locations and the Hulahula River, that are within the area available for lease under Alternative C. However, all eight locations are in areas subject to NSO, and therefore, impacts on these priority recreation areas are anticipated to be the same as under Alternative B.

NSO setbacks from rivers, such as the Canning (3 miles) and Hulahula Rivers (4 miles), would better maintain recreation opportunities and avoid the displacement of visitors in those priority recreation corridors. This would come about by providing greater opportunity for vegetation or topography to consistently screen new facilities or vehicle traffic from view of users in the river corridors; however, vegetation along rivers in the

program area are short, scrubby brush. The intensity of the impact would depend on structure height, topography, and vegetation that influence a user's line of sight from the river corridor. It is likely the potential impacts from mineral activity development may still exist despite being viewed from a long distance.

The potential for user conflicts in river corridors would be nearly the same as Alternative A but to a lesser degree. This is because the wide corridor setbacks would support visitor dispersion in the corridor without being constrained by development.

Where unobstructed by topography or vegetation, infrastructure and vehicle traffic would be visible from the rivers. This would alter the recreation setting and could contribute to diminished user experiences. Where vegetation and topography provide screening, impacts would be nearly the same as under Alternative A. The exception would be at nighttime, when artificial lighting skyward of any new facilities would be visible, which would affect recreation, as described under *Impacts Common to All Action Alternatives*, above. A narrower 1-mile setback along the Jago River would result in the same impacts as Alternative B. Outside the river corridor setbacks, the potential for displacing visitors and limiting access would be the same as Alternative B and as described under *Impacts Common to All Action Alternatives*, above.

Protection measures limiting activity in polar bear denning habitat and caribou summer, calving, and post-calving habitat would minimize the potential for species dispersion, or decline, which would indirectly maintain the quality of hunting and wildlife viewing experiences. This would also minimize impacts on the viability of specially permitted commercial operators.

In the long term, requiring final abandonment to meet minimal standards for WSR designation and intent to restore general wilderness characteristics of the area, such as solitude or absence of human activity, would allow the program area to return to a remote recreation setting. The removal of facilities and restoration of disturbed areas would decrease displacement and access impacts associated with those features.

Alternative D

Under Alternative D, 765,800 acres (49 percent of the program area) would be made available for leasing, of which 46 percent (726,300 acres) would be subject to NSO, which would largely concentrate the *Impacts Common to All Action Alternatives* described above into an exceedingly small portion, only 2 percent, of the program area. Compared with Alternative A, the greatest potential for impacts on recreation would occur within the 39,500 acres (2 percent of the program area) available for leasing with surface use. In total, there would be 1,539,900 acres (98 percent of the program area) where protective measures would minimize impacts on recreation, including acreage not available for leasing or subject to NSO or CSU. In addition to the limited availability of land for oil and gas development, under Alternative D an estimated 1,040 acres of surface disturbance would be anticipated, further limiting impacts on the recreation setting as compared to Alternative B.

As a result of such narrow availability for oil and gas development, the quality of views and noise associated with a natural, remote setting would continue to be present across much of the program area and disturbance from oil and gas operations could be avoided.

Effects of seismic exploration would be the same as under Alternative C.

The intensity of impacts would be less than under Alternative C due to Alternative D incorporating a higher level of conservation and environmental protection into management of the program area (see **Chapter 2**). Impacts from oil and gas operation on recreation qualities that attract visitors to the Coastal Plain, such as remoteness, wildlife, and naturalness, would be minimized and highly concentrated.

There are seven priority recreation areas, including six landing areas and the Hulahula River, that are within the area available for lease under Alternative D. However, all priority recreation areas are located in areas open for leasing are subject to NSO and the impacts on these seven priority recreation areas are anticipated to be the same as under Alternative B.

The setbacks provided for an increased number of rivers and streams under Lease Stipulation 1 would limit impacts on recreation experiences in those areas. The setbacks for the Canning and Hulahula Rivers would remain the same as under Alternative C, with impacts anticipated to be the same as those described under Alternative C.

Impacts on wildlife important to recreation opportunities would be similar to Alternative C, but enhanced protections and restrictions would likely decrease the potential impacts. Lease Stipulations 4, 5, 6, and 14 would provide greater protections of habitat for species important to recreation, including caribou, polar bear, and fish. For example, Lease Stipulation 6 would provide enhanced protection for caribou at various life stages, which would support recreation activities including hunting and wildlife viewing. **Section 3.3.4, Terrestrial Mammals**, provides further description of the impacts on caribou under Alternative D.

Impacts on areas possessing high quality wilderness characteristics would be similar to those described under Alternative C, although Lease Stipulation 10 would apply additional protections through use restrictions and a more limited area available for development. Lease Stipulation 10 also would provide a higher level of protection for wilderness character by including no leasing areas in addition to NSO stipulations. Alternative D would have more restrictions on oil and gas development that may affect important wilderness areas that attract recreationists, including backpackers, hikers, and campers than Alternative C (see **Section 3.4.7, Special Designations**).

Alternative D2

Under Alternative D2, 400,000 acres (26 percent of the program area) would be made available for leasing. This alternative presents the smallest leasable area of all action alternatives. Impacts would be similar to those described under Alternative D, but with additional restrictions and stipulations; of the 400,000 acres available, 231,700 acres would be subject to NSO. This would concentrate the *Impacts Common to All Action Alternatives* described above into a smaller portion of the program area. The greatest potential for impacts on the recreation experience and setting would be within the 168,300 acres available for leasing with surface use (CSU, TL, and STC). Overall, Alternative D2 estimates a total of 995 acres of surface disturbance to support oil and gas leasing within the area available for lease (400,000 acres); seismic exploration would also be limited to this area.

In total, there would be 1,479,500 acres (94 percent of the total program area) where protective measures would minimize impacts on recreation by limiting the lands available for leasing or requiring NSO or CSU stipulations. These measures would limit oil and gas construction and infrastructure that would affect the visual landscape, prevent recreation in certain areas, or diminish the quality of recreation experience. The remaining 84,000 acres (6 percent of the total program area) available for leasing would be subject to STC and TL. As a result of the minimal area available for leasing, Alternative D2 would have the least impact on the quality of the viewshed of all action alternatives.

Stream and river setbacks would be the same as those described under Alternative D, except for Marsh Creek and Carter Creek, which would be buffered by a 0.5-mile setback under Lease Stipulation 1. Impacts to visitors recreating along these river corridors would be the same as under Alternative D.

Alternative D2 emphasizes protection of key resources, including wildlife and wildlife habitat areas that draw recreationists to the Coastal Plain. For example, Lease Stipulation 5 would preclude leasing from the coast to 1-mile inland along the coastline of critical polar bear denning habitat near the Canning/Staines Rivers and Camden Bay. Lease Stipulation 9 would not allow oil and gas infrastructure to be permitted from the coastline to 2 miles inland, and timing limitations for oil and gas activities would further protect nearshore marine water waters, lagoons, barrier islands, and their value as fish and wildlife habitat. These additional protective measures would contribute to maintaining the presence and prevalence of wildlife that supports viewing opportunities.

Lease Stipulations 2, 4, 5, 9, and 10 would have the same requirements as Alternative D, but would include exceptions in NSO areas that would allow the BLM Authorized Officer and USFWS surface manager (in consultation with relevant agencies and stakeholders) to authorize a one-time exception for oil and gas infrastructure, if the proponent demonstrates no practical alternatives to accessing subsurface resources and the proposed activity maintains resource function and complies with applicable laws. These exceptions could potentially impact the recreation qualities wilderness characteristics that attract visitors (remoteness, natural landscape); however, impacts would be minimal because Alternative D2 presents the smallest area subject to NSO (231,700 acres) or available for lease sale (400,000 acres) of all action alternatives.

Transboundary Impacts

Transboundary impacts on recreation are likely to occur as a result of the leasing program in the Coastal Plain. The program area offers recreation experiences that depend on the physical setting. Visual quality, remoteness, and uniqueness directly influence the desire to recreate in the program area and the satisfaction obtained from recreation. Disturbing the landscape of the Coastal Plain through the five phases of oil and gas development may affect the desirability of recreation and quality of priority recreation areas in the program area. Development may displace recreation to areas outside of the Coastal Plain, such as the Kongakut River, other remote regions of Alaska, or Canada.

Cumulative Impacts

Potential cumulative impacts on recreation would be the result of actions or circumstances, both in or outside the ability of the BLM to manage, that would enhance or diminish the quality of the recreation setting, limit access or displace visitors or non-federally qualified subsistence users, increase or decrease conflicts between recreationists, increase or decrease the ability of commercial operators to carry out specially permitted activities, or enhance or diminish subsistence opportunities. Past, present, and reasonably foreseeable future actions described in **Appendix C** that would cumulatively impact recreation include increasing recreation use in the program area, and energy and infrastructure development.

Under all alternatives, there would be an increased demand for recreation use in the program area driven by desirability of recreation in the program area and population growth. While demand for recreation is expected to increase in the program area, the values that contribute to positive recreational outcomes may change due to future leasing and development that may reduce demand. This would be the case particularly on lands that are easily accessed from nearby communities or waterways. With this increased demand, the social recreational setting would continue changing, resulting in the potential for more frequent and intense user interactions.

Under all action alternatives, with increasing demand, the displacement of visitors near leasing areas would increase recreation use in other locations in the program area, particularly at the Kongakut River. The direct impacts on the program area may indirectly move recreation to places outside the program area, such as the

Kongakut River, and may increase the potential for user conflicts in those areas. Over time, more rules and regulations to control access and use may be needed. These potential changes would cumulatively impact the quantity and quality of recreation opportunities that can be offered and the recreation experience and opportunities that can be provided.

Under all action alternatives, oil and gas development from projects such as the Alaska LNG, Willow, and Greater Mooses Tooth would increase the presence of well pads, pipelines, roads, and other infrastructure. This could displace recreation in the program area. Increase use along the Dalton Highway to access oil and gas projects may adversely affect the ability of recreationists to access the program area.

Combined with increased visitation and other reasonably foreseeable future actions, such as the ASTAR program, new infrastructure development may increase the potential for user conflicts and decrease recreation experience qualities in those areas. Removing infrastructure and reclaiming these areas would decrease but would not fully eliminate impacts to recreation. New roads associated with private industry development would be available for private industry access and subsistence use only. The intensity of impacts on visitor experiences and recreation setting would be greatest in areas where infrastructure is visible, and operations are audible. Visitors displaced from certain areas because of oil and gas activity could choose alternate locations in the program area to recreate, which could lead to more frequent conflicts among recreationists in those areas.

The effects of climate change described under *Affected Environment* above, could influence the rate or degree of the potential cumulative impacts.

3.4.7 Special Designations

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on special designations from on-the-ground activities over an eighty-five-year time frame. **Appendix C** identifies oil and gas actions that would likely occur.

Marine Protected Areas

Alternative A

Under Alternative A, no federal minerals in the program area would be offered for future oil and gas lease sales. Current management actions for the MPA would be maintained and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). There would be no potential direct or indirect impacts on the natural heritage of the MPA from oil and gas activities under this alternative.

Impacts Common to All Action Alternatives

Appendix C summarizes hypothetical scenarios under each alternative for the leasing, exploration, development, production, and abandonment and reclamation phases of oil and gas activities. Under all action alternatives, there would be areas open to leasing. The development and activities associated with areas open to leasing would affect MPA natural heritage. The natural heritage conservation focus of the MPA would be

affected by activities or development that cause a loss of sea ice, changes in freshwater input, increased rates of coastal erosion or accretion, increased shipping activity, offshore development, oil spills, or an introduction of invasive species associated with marine shipping.

Alternative B

Under Alternative B, potential impacts from exploration and development could affect the MPA natural heritage, as described in **Section 3.3**, Biological Resources and **Section 3.4.3**, Subsistence Uses and Resources. Marine and coastal ecosystem impacts would likely occur in the northwestern portion of the program area. This is because exploration wells would be focused in this high potential zone for oil and gas development. Also, during the exploration phase, seismic exploration could cause erosion, especially along stream banks (NRC 2003, page 5). Impacts from coastal erosion are discussed further under *Geologic Hazards* in **Section 3.2.5**, Geology and Minerals.

As summarized in **Appendix C**, most equipment used for construction during the development phase would be transported from a barge landing. Barge landings and staging areas used to transport materials and supplies for facilities could have potential indirect long-term impacts on the MPA by increasing rates of coastal erosion. Gibbs and Richmond (2017) examined shoreline change along Alaska's arctic coast between 1947 and 2012. They found significant modification to coasts and beaches have occurred where production sites sit right on the coast. A more project-specific analysis would occur during the Application for Permit to Drill (APD) phase of development.

Under Lease Stipulation 4, exploratory well drill pads, production well drill pads, or a CPF for oil or gas would not be permitted in nearshore marine waters, lagoons, or barrier islands within the boundaries of the Coastal Plain. If the BLM Authorized Officer approves infrastructure for oil and gas activities necessary to be in these critical and sensitive habitats, the lessee, operator, and contractor would develop and implement an impact and conflict avoidance and monitoring plan. This would be used to assess, minimize, and mitigate the effects of the infrastructure and its use on these nearshore marine area habitats and their use by wildlife and people, which would minimize impacts on MPA natural heritage values.

Lease Stipulation 9 would require lessees, operators, and contractors to conduct a coastline survey in the coastal area between the northern boundary of the Arctic Refuge and the mainland, and inland areas within two miles of the coast. The lessees, operators, and contractors would then be required to develop and implement an impact and conflict avoidance and monitoring plan to assess, minimize, and mitigate the effects of the infrastructure and its use on these coastal area habitats and their use by wildlife and people. This analysis would help reduce potential long-term impacts on the Arctic Refuge MPA natural heritage conservation focus that activities under this alternative could present.

Alternative B includes 1,563,500 acres available for oil and gas leasing. Compared with Alternative A, impacts on the Arctic Refuge MPA natural heritage values would be greatest under Alternative B, as there would likely be more transportation of materials and supplies for oil and gas development in the coastal areas. A more site-specific analysis would occur during the APD phase of development.

Alternative C

Under Alternative C, impacts would be similar to those as described under Alternative B, but more constraints would apply, thereby reducing the intensity of potential impacts on the Arctic Refuge MPA.

Lease Stipulation 4 would have the same requirements as Alternative B, with some additional requirements. For example, approval would be on a case-by-case basis, in consultation with the USFWS or NMFS or both.

Also, all lessees, operators, and contractors involved in authorized activities in nearshore marine waters must coordinate construction and use infrastructure with all other prospective Arctic Refuge users or user groups. These additional standards and processes would further help reduce potential long-term impacts on the Arctic Refuge MPA natural heritage conservation focus that activities under this alternative could present.

Under Alternative C, Lease Stipulation 9 would be the same as Alternative B but with additional requirements including NSO allowed within 2 miles of the coast for exploratory well drill pads, production well drill pads, or CPFs for oil and gas development. The BLM may authorize permanent oil and gas infrastructure in the nearshore marine area, subject to additional standards that would further protect Arctic Refuge MPA natural heritage, cultural heritage, and sustainable production.

Alternative C includes 1,037,200 acres available for oil and gas leasing. Impacts on the Arctic Refuge MPA would be more than under Alternative A due to the increase in construction and development for oil and gas as well as transportation of materials and supplies for oil and gas development in the coastal areas than is likely to occur under current management.

Alternative D

Under Alternative D, 797,700 acres would not be offered for lease sale. Impacts would be similar to those described under Alternative C, but more constraints would apply, thereby reducing the intensity of potential impacts on the Arctic Refuge MPA natural heritage values.

Lease Stipulation 4 would have the same requirements as Alternatives B and C, with additional requirements. For example, before conducting open water activities, the lessee, operator, and/or contractor would consult with the: Alaska Eskimo Whaling Commission, NSB, Alaska Nanuut Co-management Council, Inuvialuit-İñupiat Agreement, and local whaling captains' associations to minimize impacts on subsistence whaling and other subsistence activities in the communities of the North Slope. These additional requirements would add an extra layer of protection to MPA natural heritage, cultural heritage, and sustainable production.

Lease Stipulation 9 would include the same requirements as Alternatives B and C, with additional standards. For example, under Alternative D, Lease Stipulation 9 would require local traditional knowledge holders to join in developing and implementing an impact and conflict avoidance and monitoring plan. These additional requirements would help protect MPA natural heritage values.

Alternative D includes 765,800 acres available for oil and gas leasing. Impacts on the Arctic Refuge MPA would be more than under Alternative A, due to the increase in construction and development for oil and gas as well as transportation of materials and supplies for oil and gas development in the coastal areas than is likely to occur under current management.

Alternative D2

Under Alternative D2, 1,163,500 acres would not be offered for lease sale. Impacts would be similar to those described under Alternative D, but with more stringent constraints. The alternative ensures the statutory minimum of 400,000 acres available for lease sale is within the northwest portion of the program area with the highest hydrocarbon potential, thereby reducing the intensity of potential impacts on the Arctic Refuge MPA natural heritage values.

Lease Stipulation 4 would have the same requirements as Alternatives B, C, and D, with additional requirements. For example, exceptions would be considered on a case-by-case basis and would require coordination between the BLM Authorized Officer and the USFWS as surface manager. In NSO areas, a one-time exception may be granted if there are no practical alternatives to accessing subsurface resources, the

proposed action would maintain resource functions, and the proposed action complies with other applicable laws. Infrastructure necessary for oil and gas development in critical and sensitive habitats may be approved on a case-by-case basis, in consultation with relevant agencies and stakeholders. Additionally, oil and gas activities are restricted in certain marine waters and coastal areas during specified times, with requests for approval required in advance and subject to review. These additional requirements would add an extra layer of protection to MPA natural heritage, cultural heritage, and sustainable production.

Lease Stipulation 9 would include the same requirements as Alternatives B, C, and D, with additional standards. For example, under Alternative D2, Lease Stipulation 9 would require local traditional knowledge holders to participate in developing and implementing an impact and conflict avoidance and monitoring plan. Additionally, no permanent oil and gas infrastructure would be permitted from the coastline to two miles inland, with exceptions considered on a case-by-case basis and requiring coordination between the BLM Authorized Officer and the USFWS. Oil and gas activities in certain marine waters and coastal areas are restricted during specified times. These additional requirements would help protect MPA natural heritage values.

Alternative D2 presents the fewest acres available for oil and gas leasing of all the action alternatives (400,000 acres). Therefore, Alternative D2 would result in least indirect impacts on MPA natural heritage values from oil and gas development compared to the other action alternatives. Impacts on the Arctic Refuge MPA would be more than under Alternative A, due to the increase in construction and development for oil and gas as well as transportation of materials and supplies for oil and gas development in the coastal areas than is likely to occur under current management.

Transboundary Impacts

The Tarrum Nirvutait Marine Protected Area (TNMPA) was designated in August 2010 and is Canada's first Arctic MPA (Canada DFO 2018, page 2). The three sub-regions of the TNMPA are Niaqunnaq, Okeevik, and Kittigaryuit; they are approximately 80, 120, and 180 miles from the eastern boundary of the US-Canada border, respectively, and total approximately 432,400 acres. Key threats to the TNMPA identified in a Canadian Science Advisory Secretariat Science Advisory Report (Canada DFO 2010, page 5) are climate change, commercial fishing, contaminants and diseases, hydrocarbon development and related activity, land-based activities, noise and disturbance, recreation and tourism, shipping and vessel traffic, and subsistence harvesting. Project-specific NEPA analysis for any future oil and gas activity in the program area would further explore how development in the program area could affect the TNMPA.

Cumulative Impacts

Past actions and events contributing to cumulative effects in and near the Arctic Refuge MPA have resulted primarily from surface-disturbing activities such as oil and gas exploration, development, production, and transportation for these uses, including shipping routes for delivery of development materials. Oil and gas development near the program area is expected to continue, which would also increase associated transportation activities, such as shipping and barging materials and supplies to the program area.

The following reasonably foreseeable future onshore oil and gas projects are included in the cumulative effects analysis: Nanushuk, Alpine CD-5, Greater Mooses Tooth, Nuna, Willow, Greater Prudhoe Bay/Kuparuk, Point Thomson, Alaska LNG Project, Endicott Project, Liberty Project, Northstar Development Project, and the Arctic Strategic Transportation and Resources (ASTAR); see **Appendix G** for more discussion of these reasonably foreseeable future actions.

In addition to air, land, and marine transport associated with oil and gas activities, there is frequent marine and air traffic associated with coastal communities on the North Slope. It is reasonable to assume that trends associated with transportation to facilitate the maintenance and development of coastal communities will continue. Typically, vessels offshore of the program area are those that support oil and gas industries, barges or cargo vessels used to supply coastal villages, smaller vessels used for hunting and location transportation during the open water period, research vessels, and a limited number of recreational vessels.

Climate change is an ongoing factor in the consideration of cumulative effects in the Arctic. Climate change could affect the habitat, behavior, distribution, and populations of fish and wildlife within the program area. Climate change could also affect the availability of, or access to, subsistence resources. The trends in climate change that were described in the GMT2 Final SEIS (BLM 2018a), and incorporated by reference into this SEIS, are expected to continue.

The greatest contribution to cumulative impacts would be under Alternative B, which would include the largest area available for oil and gas leasing (1,563,500 acres) and would have the fewest protections for the conservation and management of Arctic Refuge MPA natural heritage, cultural heritage, and sustainable production.

Wild and Scenic Rivers

Alternative A

Under Alternative A (No Action Alternative), no federal minerals in the program area would be offered for future oil and gas lease sales. Current management actions for WSRs would be maintained and resource trends would continue, as described in the Arctic Refuge CCP (USFWS 2015a). The USFWS would manage the four suitable rivers identified in **Table B-23** to maintain the river values and preliminary classifications. There would be no potential direct or indirect impacts on WSR river values and preliminary classifications from oil and gas activities under Alternative A.

Impacts Common to All Action Alternatives

Appendix B summarizes hypothetical scenarios under each alternative for the leasing, exploration, development, production, and abandonment and reclamation phases of oil and gas activities. Under all action alternatives, the BLM would maintain water quality and ensure that authorized uses comply with state and Environmental Protection Agency water quality standards. Management actions that prohibit surface-disturbing activities, including NSO, CSU, and TLs near the WSRs (**Table B-23**) would provide varying protections for ORVs. This would also ensure that the free-flowing condition of the river remains intact. Infrastructure that is installed within 0.5 mile of any eligible or suitable river, such as bridges, has the potential to downgrade a river's wild classification to that of a recreational classification, which allows some development. General impacts resulting from oil and gas development in the program area could include potential soil erosion and habitat fragmentation, which could affect cultural, fish, geologic, recreation, scenic, and wildlife ORVs. The degree of impacts on eligible and suitable WSRs would depend on the proximity of development to the river. Impacts on recreation uses, and therefore to the Recreation ORV, are described under **Section 3.4.6, Recreation**.

Lease stipulations and ROPs would be applied to protect WSR characteristics; for example, the scenic ORV for the Kongakut River may necessitate modeling and additional setbacks in the program area to ensure infrastructure is not visible from any point in the Kongakut River corridor, or the sport fishing opportunities described as part of the Marsh Fork-Canning River recreational ORV may be preserved by stipulating program

actions in the downstream segments of the program area (USFWS 2015b, Appendix I [Wild and Scenic River Review], Section 5.7.2).

Alternative B

Under Alternative B, Lease Stipulation 1 would require a NSO standard (358,100 acres), which would prohibit permanent oil and gas facilities, including gravel pads, roads, airstrips, and pipelines, in the streambed and in the described setback distances outlined in **Table 3-34**.

Table 3-34
Eligible and Suitable River Setback Distances Under Alternative B

River	Preliminary Classification	Setback Distance
Canning	Eligible	From the western boundary of the Coastal Plain to 1 mile east of the eastern edge of the active floodplain
Hulahula	Eligible and Suitable	1 mile in all directions from the active floodplain
Jago	Eligible	1 mile from the banks' ordinary high-water mark
Okpilak	Eligible	1 mile from the banks' ordinary high-water mark

Source: USFWS 2015b

For streams entirely in the Coastal Plain (**Map 3-64** in **Appendix A**), the setback extends to the head of the stream as identified in the National Hydrography Dataset.¹⁴ Essential pipelines and road crossings would be permitted through setback areas in accordance with PL 115-97. Gravel mines could also be permitted in setback areas. The setbacks may not be practical in river deltas. In these situations, the BLM Authorized Officer may grant an exception, if the operator can demonstrate that there are no practicable alternatives to locating facilities in these areas, the proposed actions would maintain or enhance resource functions, and permanent facilities are designed to withstand a 100-year flood. Under Lease Stipulation 3, before any drilling occurs, the lessee, operator, and permittee would conduct studies to ensure drilling would not disrupt flow to or from the perennial springs and waste injection wells will not contaminate any perennial springs. Study plans would be developed in consultation with the BLM, USFWS, and other agencies, as appropriate. The process would help ensure that impacts on WSR river values are minimized.

Overall, because this alternative offers the fewest restrictions for disturbances to these rivers, Alternative B would have the greatest magnitude of impacts on eligible and suitable WSRs as compared to Alternative A. A more site-specific analysis would occur during the APD phase of development to further analyze impacts on river values and the free-flowing condition of rivers when locations of proposed developments, such as bridges, pilings, or any bank modifications, would be known.

Alternative C

Under Alternative C, potential impacts from requiring Lease Stipulation 1 (708,200 NSO acres) would be similar to those described under Alternative B, but the setback distances would be larger for most of the eligible and suitable rivers outlined in **Table 3-35**. Alternative C would have greater restrictions applicable to eligible and suitable WSR corridors in areas available for oil and gas leasing than under Alternative B, which reduces the potential for impacts on WSR river values.

Lease Stipulation 3 involves an additional layer of requirements to that of Alternative B and Lease Stipulation 1. For Alternative C, Lease Stipulation 3 includes identified areas that would be closed to lease sale or identified as NSO. This requirement would reduce the potential indirect impacts on WSR values.

¹⁴National Hydrography Dataset: <https://nhd.usgs.gov/>

Table 3-35
Eligible and Suitable River Setback Distances under Alternative C

River	Preliminary Classification	Setback Distance
Canning	Eligible	From the western boundary of the Coastal Plain to 3 miles east of the eastern edge of the active floodplain
Hulahula	Eligible and Suitable	4 miles in all directions from the active floodplain
Jago	Eligible	1 mile from the banks' ordinary high-water mark
Okpilak	Eligible	3 miles from the banks' ordinary high-water mark

Source: USFWS 2015b

Alternative C would provide further protections to the fish and recreational ORVs of the Canning and Hulahula Rivers by implementing ROPs, such as preparing a gravel mine site design and reclamation plan, which excludes this activity in areas that support populations of freshwater, anadromous, or endemic fish. Alternative C would have a greater impact on WSR values than Alternative A, because under Alternative A there would be no potential direct or indirect impacts from oil and gas activities.

Alternative D

Under Alternative D, potential impacts from requiring Lease Stipulation 1 (617,900 NSO acres) would be similar to those described under Alternative B, but the setback distances would be larger for most of the eligible and suitable rivers outlined in **Table 3-36**. Alternative D would have greater restrictions applicable to WSR corridors in areas available for oil and gas leasing than under Alternatives B and C, which reduces the potential for impacts on WSR river values.

Table 3-36
Eligible and Suitable River Setback Distances under Alternative D

River	Preliminary Classification	Setback Distance
Canning	Eligible	From the western boundary of the Coastal Plain to 3 miles east of the eastern edge of the active floodplain
Hulahula	Eligible and Suitable	4 miles in all directions from the active floodplain
Jago	Eligible	1 mile from the bank's ordinary high water-mark
Okpilak	Eligible	0.5 mile from the bank's ordinary high watermark

Source: USFWS 2015b

Lease Stipulation 3 requirements are the same as under Alternative C, with the additional requirement that before drilling, the lessee, operator, and permittee would conduct studies to ensure drilling would not disrupt flow to or from the perennial springs and waste injection wells would not contaminate any perennial springs. Study plans would be developed in consultation with the BLM, USFWS, Tribal governments, and other agencies, as appropriate, and incorporate local Indigenous knowledge, when available. This requirement would likely reduce the potential indirect impacts on WSR values.

Alternative D would provide similar protections (with the exception on the Okpilak river setback at 0.5 mile instead of 3 miles) as Alternative C to the fish and recreational ORVs of the Canning and Hulahula Rivers by implementing ROPs, such as preparing a gravel mine site design and reclamation plan, which excludes this activity in areas that support populations of freshwater, anadromous, or endemic fish. Alternative D, as compared to Alternative A, would cause greater indirect impacts on WSR values, because under Alternative A there would be no potential direct or indirect impacts from oil and gas activities.

Alternative D2

Under Alternative D2, potential impacts from requiring Lease Stipulation 1 (231,600 NSO acres) would be similar to those described under Alternative D, including the setback distances for the eligible and suitable rivers outlined in **Table 3-37**. Alternative D2 would have greater restrictions applicable to WSR corridors in areas available for oil and gas leasing than under Alternatives B, C and D, which reduces the potential for impacts on WSR values.

Table 3-37
Eligible and Suitable River Setback Distances under Alternative D2

River	Preliminary Classification	Setback Distance
Canning	Eligible	From the western boundary of the Coastal Plain to 3 miles east of the eastern edge of the active floodplain
Hulahula	Eligible and Suitable	4 miles in all directions from the active floodplain
Jago	Eligible	1 mile from the bank's ordinary high water-mark
Okpilak	Eligible	0.5 mile from the bank's ordinary high watermark

Source: USFWS 2015b

Lease Stipulation 3 requirements are the same as under Alternative D, with the additional objective to minimize the disruption to polar bear denning habitat.

Alternative D2 would provide the same protections as Alternative D to the fish and recreational ORVs of the Canning and Hulahula Rivers by implementing ROPs, such as preparing a gravel mine site design and reclamation plan, which excludes this activity in areas that support populations of freshwater, anadromous, or endemic fish. Alternative D2, as compared to Alternative A, would cause greater indirect impacts on WSR values, because under Alternative A there would be no potential direct or indirect impacts from oil and gas activities.

Transboundary Impacts

No transboundary impacts are expected for WSRs because river segments that have been identified as eligible or suitable for designation in the National Wild and Scenic Rivers System do not cross international boundaries. See **Section 3.2.10**, Water Resources, for potential transboundary impacts on water quality and supply.

Cumulative Impacts

Past actions and events contributing to cumulative effects in or next to rivers have resulted primarily from surface-disturbing activities, such as oil and gas exploration, development, production, and transportation for these uses. Activities of oil and gas development near the program area is expected to continue. As a result, surface-disturbing activities, such as oil and gas development, transportation, and recreation affecting rivers, would continue; however, the BLM and USFWS would maintain discretionary authority over most land uses and would permit only those actions that would not impair or conflict with river systems, reducing cumulative effects on these areas. As development and transportation increases, access and use in or next to rivers would also increase.

The following reasonably foreseeable future onshore oil and gas projects are included in the cumulative effects analysis: Nanushuk, Alpine CD-5, Greater Mooses Tooth, Nuna, Willow, Greater Prudhoe Bay/Kuparuk, Point Thomson, Alaska LNG Project, Endicott Project, Liberty Project, Northstar Development Project, and ASTAR; see **Appendix G** for more discussion of these reasonably foreseeable future actions.

Climate change is an ongoing factor in the consideration of cumulative effects in the Arctic. Climate change could affect the ORVs and habitat, behavior, distribution, and populations of fish and wildlife within the program area. Climate change could also affect the availability of, or access to, subsistence resources. The trends in climate change that were described in the GMT2 Final SEIS (BLM 2018a), and incorporated by reference into this SEIS, are expected to continue.

The types of reasonably foreseeable future actions that could affect eligible and suitable WSRs would be similar to past and present actions. Cumulative impacts may be reduced or avoided if future actions or decisions in the program area incorporate measures to reduce or avoid impacts on river-related values. Examples are maintaining ORVs or the free-flowing nature of eligible or suitable segments in the program area, in accordance with the Wild and Scenic Rivers Act.

Wilderness Characteristics, Qualities, and Values

In general, discussions of potential impacts on wilderness characteristics, qualities, and values tend to be more qualitative, measured by the overall visual quality, naturalness, wildness, and symbolic values of an area that may be affected. Indicators of wilderness characteristics include changes to the untrammeled and naturalness of the program area opportunities for solitude or primitive and unconfined recreation or to other unique or supplemental values.

Alternative A

Under Alternative A, no federal minerals in the program area would be offered for future oil and gas lease sales. Current USFWS management focuses on no or minimal manipulation of the environment, wildness, and promoting actions that facilitate solitude, self-discovery, self-reliance, remoteness, and primitive or unconfined recreation that would have long-term effects on wilderness characteristics. There would be no potential direct or indirect impacts on wilderness characteristics from oil and gas activities under Alternative A.

Impacts Common to All Action Alternatives

Appendix B summarizes hypothetical scenarios under each alternative for the leasing, exploration, development, production, and abandonment and reclamation phases of oil and gas activities. Management actions associated with oil and gas activities that would affect the natural appearance of lands in the program area could include the presence or absence of roads and trails, use of motorized vehicles on those roads and trails, seismic data acquisition using vibroseis trucks, construction of facilities and infrastructure for energy development, or other actions that result in or prevent surface-disturbing activities. All these activities affect the presence or absence of human activity and, therefore, would affect an area's naturalness and opportunities for solitude in the program area.

Due to the relatively horizontal topography of the Coastal Plain and elevation changes in the Mollie Beattie Wilderness Area next to the program area, vast distances of the Coastal Plain from the wilderness area can be seen. Viewing oil and gas development in the Coastal Plain from the wilderness would affect the wilderness experience associated with visiting an area where the imprint of human's work is unnoticeable.

Alternative B

Alternative B has the most acres available for oil and gas leasing and the fewest restrictions on surface disturbance. Alternative B includes 1,563,500 acres available for oil and gas leasing. Potential impacts on wilderness characteristics under Alternative B from oil and gas development would be reduced in the areas being managed as NSO (358,100 acres) or areas with TLs (585,400 acres) (BLM and USFWS GIS 2022). Prohibiting surface-disturbing activities and new developments in certain locations through the NSO and TLs

would aid in maintaining the program area's apparent naturalness and opportunities for solitude or primitive and unconfined recreation. As compared to Alternative A, wilderness characteristics would be eliminated on a site-specific basis should new roads be authorized; however, the area would likely retain some of its overall wilderness character. Temporary and permanent access routes to a lease area traveled by developers would adversely impact the wilderness character of that area. The degree of potential impacts on wilderness character, including changes to the untrammelled and naturalness of the program area, opportunities for solitude or primitive and unconfined recreation, and unique or supplemental values, would depend on the intensity of development, which would be further analyzed during the project-specific APD phase of development.

Alternative C

Under Alternative C, wilderness characteristics would be affected by development in adjacent areas. Alternative C includes 1,037,200 acres available for oil and gas leasing. Potential impacts would be reduced in the areas being managed as NSO (708,200 acres) or areas with CSUs (123,900 acres) (BLM and USFWS GIS 2022). Detrimental indirect impacts on wilderness characteristics, including changes to the untrammelled and naturalness of the program area, opportunities for solitude or primitive and unconfined recreation, and unique or supplemental values, would be similar as those described under Alternative B, but to a lesser degree due to more areas being managed with NSO and CSU requirements.

Alternative C would implement Lease Stipulation 10, which requirements would further protect naturalness and opportunities for solitude from visual obstructions and noise in the program area and the adjacent Mollie Beattie Wilderness Area. This would be achieved through the management of NSO (96,600 acres) and the exclusion of certain areas within 3 miles of the Mollie Beattie Wilderness Area from leasing. Additionally, there would be plans to minimize aircraft operations flights below 2,000 feet and 3 miles of the southern and eastern boundaries of the Coastal Plain where they are adjacent to the Mollie Beattie Wilderness Area. The degree of potential impacts would be greater than under Alternative A.

Alternative D

Under Alternative D, wilderness characteristics would be affected by development in adjacent areas. Potential impacts would be reduced in the areas being managed as NSO (726,300 acres) or areas with CSUs (15,900 acres) and TLs (1,800 acres) (BLM and USFWS GIS 2022). Detrimental indirect impacts on wilderness characteristics, including changes to the untrammelled and naturalness of the program area, opportunities for solitude or primitive and unconfined recreation, and unique or supplemental values, would be similar as those described under Alternative B, but to a lesser degree due to more areas being managed with NSO, CSU, and TL requirements.

Alternative D also would implement Lease Stipulation 10, with similar requirements as under Alternative C. However, under Alternative D, 210,200 acres along the wilderness boundary would not be offered for sale. Additionally, there would be NSO (42,000 acres) and areas within 3 miles of the Mollie Beattie Wilderness Area that would not be offered for lease. This approach would provide enhanced protection to wilderness characteristics, including changes to the untrammelled and naturalness of the program area, opportunities for solitude or primitive and unconfined recreation, and unique or supplemental values. The degree of potential impacts would be greater than under Alternative A.

Alternative D2

Under Alternative D2, wilderness characteristics would be affected by development in adjacent areas. Potential impacts would be reduced in the areas being managed as NSO (231,700 acres) or areas with CSUs

(84,300 acres) and TLs (80,900 acres) (BLM and USFWS GIS 2022). Under this alternative, 995 acres of surface disturbance are estimated to occur. Detrimental indirect impacts on wilderness characteristics, including changes to the untrammeled and naturalness of the program area, opportunities for solitude or primitive and unconfined recreation, and unique or supplemental values, would be fewer than those described under Alternative D.

Alternative D2 also would implement Lease Stipulation 10, including 210,200 acres along the wilderness boundary not offered for sale. It would also include NSO (17,200 acres) and areas within 3 miles of the Mollie Beattie Wilderness Area that would not be offered for lease. These measures would provide enhanced protection to wilderness characteristics, including changes to the untrammeled and naturalness of the program area, opportunities for solitude or primitive and unconfined recreation, and unique or supplemental values. Additionally, all exception requests will be coordinated between the BLM Authorized Officer and the USFWS as surface manager, with a one-time exception possible in NSO areas under specific conditions. The degree of potential impacts would be greater than under Alternative A.

Transboundary Impacts

No transboundary impacts are expected for wilderness characteristics.

Cumulative Impacts

Past actions and events contributing to cumulative effects in nearby Wilderness or lands with wilderness characteristics have resulted primarily from surface-disturbing activities, such as oil and gas exploration, development, production, and transportation on existing routes for these uses. Activities of oil and gas development near the program area is expected to continue. As a result, surface-disturbing activities affecting the indicators for wilderness characteristics would also continue.

The following reasonably foreseeable future onshore oil and gas projects are included in the cumulative effects analysis: Nanushuk, Alpine CD-5, Greater Mooses Tooth, Nuna, Willow, Greater Prudhoe Bay/Kuparuk, Point Thomson, Alaska LNG Project, Endicott Project, Liberty Project, Northstar Development Project, and ASTAR; see **Appendix G** for more discussion of these reasonably foreseeable future actions.

Passenger and air cargo flights between Fairbanks and each of the communities in the Arctic Refuge and across the North Slope often include several scheduled flights of small propeller-driven aircraft. Government agencies, researchers, and recreationists often charter aircraft for travel and research. Aircraft traffic is expected to continue; levels of traffic may increase because of increased industrial activity, tourism, and community development.

Community development projects in Arctic communities involve both large and small infrastructure projects. For example, the new airport in Kaktovik is a past community development project. Smaller projects resulting from and leading to community growth could further increase demand for public services and infrastructure, such as airport construction upgrades, roads, port and dock construction, telecommunications, alternative energy infrastructure, and telecommunications projects.

The greatest contribution to cumulative impacts under the action alternatives would be under Alternative B, which would include the most areas (1,563,500 acres) being available for oil and gas leasing and have the fewest protections for wilderness characteristics, including changes to the untrammeled and naturalness of the program area, opportunities for solitude or primitive and unconfined recreation, and unique or supplemental values, from surface-disturbing activities.

3.4.8 Visual Resources

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, production, including transportation of oil and gas in and from the Coastal Plain, and abandonment and reclamation.

Appendix C identifies oil and gas actions that would likely occur; therefore, the analysis considers potential impacts on visual resources from on-the-ground activities over an 85-year time frame. The BLM visual resource management system was used as a general framework for describing and analyzing impacts on visual resources. Although the BLM administers the oil and gas leases, neither a BLM VRI nor a BLM visual resource contrast rating were conducted for the analysis; however, future analysis that demonstrates contrast from current conditions would be conducted in subsequent NEPA analyses for oil and gas activities. It would include conducting viewshed analyses and preparing photosimulations.

In the event of an oil spill, visual resources would be affected by the spill itself, cleanup activities, and any residual changes to the landscape. See **Section 3.2.11** for more discussion on oil spills.

The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate or degree of the potential direct and indirect impacts. The locations of impacts may also vary depending on resource and site conditions.

Alternative A

Under Alternative A, no federal minerals would be offered for future oil and gas lease sales. Current management actions would be maintained, and resource trends would continue. There would be no new direct or indirect impacts on visual resources from oil and gas activities.

Impacts Common to All Action Alternatives

The completion of 3D seismic surveys would be the first step in the exploration process. After the lease sale, operators would likely conduct a smaller scale 3D survey on their own lease block, assuming that seismic information would not be already available. All seismic operations would be conducted in the winter to minimize impacts on the tundra. Seismic surveys would not count toward the surface disturbance estimate for any of the alternatives. Future project-specific NEPA analysis would be done for any proposed seismic explorations.

Seismic testing trails would be several hundred feet apart. Depending on timing and local conditions, the testing and camps could create ruts in the terrain or compress vegetation beneath equipment and snow. This could create a network of visible disturbance in the texture of the land and vegetation across the landscape.

Views of the program area would be interrupted with seismic testing vehicles, equipment, and camps. The bold colors and geometric boxy forms of vehicles and camps would not resemble the colors and forms of the surrounding terrain and vegetation. The contrast would be starker when the surrounding landscape is white with snow.

Seismic testing would involve the use vehicle lights and other lights to illuminate work locations and camp sites for visibility and safety. The intensity and amount of light would vary, depending on, for example, the light source and its orientation and the time of day and year. Also, reflective surfaces on construction equipment and vehicles would create glare. This would add artificial light and glare to areas in the program area that are nearly absent of artificial light.

The impacts from the physical presence of seismic survey activities, equipment, and vehicles would be limited to the duration of the survey. The impacts from disturbances to the terrain or vegetation would be visible until the disturbed areas are reclaimed or recover naturally. They could last beyond 25 years for some disturbances if the seismic survey occurs in a manner similar to that described in *Affected Environment (Appendix B)*.

The impacts on visual resources described below for the action alternatives would occur in different areas as described in **Chapter 2**. Impacts on visual resources would occur from oil and gas actions, such as exploration, development, and production. The impacts on visual resources described below for the action alternatives would be similar to those experienced at Nuiqsut. **Appendix C** identifies oil and gas actions that would likely occur, including hypothetical projected facilities and estimated surface disturbance by alternative.

Alternative B

Seismic exploration would be allowed across the entire program area (1,563,500 acres). The impacts are described above under *Impacts Common to All Action Alternatives*.

There would be 1,563,500 acres available for lease sale. Surface disturbances would affect visual resources. Although the 2,000 acres of surface development that could occur represents 0.13 percent of the program area, it would not be clustered in a specific area but would be spread out. There would be various discrete facilities, including gravel pits, connected by a network of gravel roads. In the long term, there would be four CPFs, two in the high potential area, one in the medium potential area south of Kaktovik, and one in the low potential area. Under this alternative, the assumption is that one or more CPFs could be on State or native lands. According to the hypothetical development scenario provided in **Appendix C**, there would be 2,000 acres of estimated disturbance. The largest portion of surface disturbance would be from 1,290 acres of gravel roads totaling 172 miles that could be needed to connect facilities (see **Table C-5**, Quantitative Summary of Lease Stipulations by Alternative).

Examples of types of facilities that would not count toward the 2,000-acre disturbance estimate are the portion of facilities that do not touch the land, such as elevated pipelines, and facilities constructed with snow or ice, such as snow trails and ice roads and pads. Pipelines are supported by vertical members. It is important to note that only the VSMs, and not the pipelines, are included in the 2,000 acres of surface development. Nevertheless, pipelines would still add to the disturbances that would affect visual resources. Approximately 212 miles of pipeline would be constructed in the Coastal Plain, depending on field design, which would contribute to altering the landscape.

Estimates are not available on the area that would be disturbed by facilities constructed with snow or ice. Future project-specific NEPA analysis would include addressing any proposed facilities constructed with snow or ice.

The impacts from the estimated 2,000 acres of surface development would affect visual resources. During construction, crews may be working concurrently at various locations. Views of the program area would be cluttered with construction equipment, materials, and vehicles. The bold colors and geometric, boxy forms of artificial construction vehicles, materials, and vehicles would not resemble the colors and forms of the

surrounding terrain and vegetation. The contrast would be starker when the surrounding landscape is white with snow. Construction vehicles, materials, and vehicles would create various focal points on an open landscape and would not resemble other landscape elements, which is mostly short vegetation during the summer. These impacts would occur only when construction vehicles, materials, and vehicles and other temporary support infrastructure are present.

Construction and operations would generate dust from vehicle movement, excavation, and wind. Fugitive dust would diminish atmospheric clarity. This impact on visual resources would persist until the dust settles or is blown elsewhere. Dust that settles on snow or ice would change the color of the surface from a light or white color to the color of the dust. This impact on visual resources would persist until the snow or ice melts and the dust is washed away.

Construction would use vehicle lights and other lights to illuminate work sites for visibility and safety. Also, reflective surfaces on construction equipment and vehicles would create glare. During operations, lights would also be used to illuminate sites for visibility and safety. Reflective surfaces on buildings and structures would also create glare. The most noticeable operations lights would be at the pads, airstrip, and barge landing and on taller structures, such as the drill rigs. The intensity and amount of light and glare would vary, depending on, for example, the light source and its orientation, the intensity and angle of sunlight, and the time of day and year.

Construction and operations would add artificial light and glare to areas in the program area that are nearly absent of artificial light. The artificial light would also increase skyglow (light that is scattered back to Earth by aerosols and clouds). Artificial light and skyglow can, in turn, affect the presence and behavior of animals viewed in the program area. Given the negligible artificial light in the program area, construction and operations lights would essentially be the only sources of artificial light that would diminish the quality of dark skies and affect animal behaviors.

The impacts from construction lights would occur only when construction equipment and vehicles are present. The impacts from operations lights would be long term. They would be more visible during nighttime and winter, when there are fewer daylight hours. Under ROP 26, all structures would be designed to direct artificial exterior lighting inward and downward, rather than upward and outward, unless otherwise required by the FAA. This would be required, however, only from August 1 to October 31. It would minimize, but not prevent, the impacts from construction and operations lights and glare.

Flaring and visible water vapor plumes would be visible at certain facilities. Flaring is the controlled burning of natural gas and a common practice in oil and gas exploration, production, and processing. A flare system consists of a flare stack and pipes that feed gas to the stack. Flare size and brightness are related to the type and amount of gas or liquids in the flare stack. Flares generate heat, noise, and light. Large flares can be quite noisy because of the volume and velocity of the gas going through the flare stack (Ohio EPA 2014). Also, visible water vapor plumes would be generated at certain facilities. The height a plume reaches would depend on a variety of factors, such as its initial velocity and ambient wind speed. Due to the relatively horizontal topography of the coastal plain, flaring and visible water vapor plumes can be visible for great distances and represent visible changes to the atmosphere that do not occur elsewhere in the coastal plain.

The ground surface would be disturbed by covering it with gravel, such as for roads and pads. The flat and simple gravel base would not resemble the uneven and complex forms of the undisturbed areas immediately beyond the surface disturbance. It would also introduce linear and angular forms to a surface devoid of discernable forms. The gravel would create a sharp edge that boldly divides disturbed areas from undisturbed

areas. The gravel roads would also introduce contrasting bands that divide the expansive landscape. These would be more prominent in areas where roads do not follow the slope of the terrain or if they are on higher topography. Because of a lack of vegetation on the gravel base, the darker smooth gravel base would not resemble the rougher vegetation with muted greens and tans beyond the gravel. Landscape and habitat fragmentation would, in turn, affect the presence and behavior of animals viewed in the program area. These impacts would be long term.

Use of gravel pits would introduce points of disturbance on the landscape. Instead of adding gravel in the case of roads and pads, gravel would be removed from pits and relocated. Due to the number of outcrops and surface deposits in the Coastal Plain, pits would be constructed next to facilities or roads used for satellite access; additional road construction would not be needed to access gravel mines. The impacts on visual resources would be similar to the aforementioned impacts from ground disturbance for roads and pads; however, instead of having a flat form and straight lines, the pits would form sunken depressions and have curved lines. Also, the depth of the pits would allow for the collection of water, possibly creating new artificial lakes.

Similar to gravel roads, pipelines would impact visual resources. Pipelines would introduce linear and rounded forms to a landscape devoid of discernable forms. The pipelines would also introduce contrasting bands that divide the expansive landscape. These would be more prominent in areas where roads do not follow the slope of the terrain. The pipelines would stand out against the surrounding muted greens and tans. They would also stand out if they are on higher topography or do not follow the natural contours of the topography and instead, for example, cross rivers or ravines. Depending on orientation, the texture of the pipelines would be smooth or bumpy, compared with the rougher vegetation. Landscape and habitat fragmentation would, in turn, affect the presence and behavior of animals viewed in the program area. These impacts would be long term.

The gravel pads would contain drills and facilities. The bold and rigid forms of the drills and facilities would contrast with the indistinct and soft forms of the surrounding undisturbed surface. The angular lines of the drills and facilities would create various focal points on an open landscape and would not resemble other landscape elements, which is mostly short vegetation during the summer. The vertical lines of the drills and facilities would be more visible during daytime and summer, when there are more daylight hours and opportunities for silhouetting to occur. They would also be more visible if they are on higher topography. The multiple colors of the drills and facilities would stand out against the muted greens and tans beyond the gravel pads. The contrast would be starker during the winter when the surrounding landscape is white this snow. The dispersed drills and facilities would create a stippled texture across a landscape with no vertical elements. Landscape and habitat fragmentation would, in turn, affect the presence and behavior of animals viewed in the program area. These impacts would be long term.

An example of what gravel roads, pads, drills, and facilities could look like is depicted in **Figures 3-8**, Visual Resources Photo 1, and **3-9**, Visual Resources Photo 2, in **Appendix A**.

At least one seawater treatment plant and at least one barge landing and storage pad would be constructed. Impacts from construction and operations would be similar to those described above. An average of two barge transports per year is anticipated. This would add marine traffic to an area that is used by other marine vessels. Depending on timing, the barge could draw the attention of views if it is the only vessel on the water. Similarly, visual intrusions in the overall landscape created by the presence of aircraft would also occur.

The locations of impacts on visual resources are shown in **Map 2-1** in **Appendix A**. Surface occupancy prohibitions would minimize but not prevent impacts on visual resources associated with, for example, rivers.

Alternative B would be the first major development in the program area. The above impacts would disrupt the visual continuity of the expansive, undeveloped, and open landscape by establishing dispersed, artificial structures with lights and a network of roads and pipelines, none of which are found elsewhere in the program area. Due to the undeveloped nature of the Coastal Plain, development of oil and gas in the program area would initiate an irreversible loss of visual resource quality. Changes to the landscape are anticipated to be visible from great distances.

Best Management Practices for Reducing Visual Impacts of Renewable Energy Facilities on BLM-Administered Lands (BLM 2013) presents BMPs to avoid or reduce visual impacts associated with the siting, design, construction, operation, and decommissioning of utility-scale renewable energy generation facilities, including wind, solar, and geothermal facilities. Although the publication is for renewable energy generation facilities, the BMPs are also applicable to other large-scale developments, such as oil and gas facilities. Implementing the BMPs or using them as mitigation would reduce impacts on visual resources. Mitigation measures, however, would be limited and minimal.

Minimizing unnecessary disturbances through BMPs or mitigation is important to minimizing impacts on visual resources and, likely, other resources. This is because many impacts would persist until disturbed areas are reclaimed. Typically, the acts of conducting abandonment and reclamation take from 2 to 5 years following the termination of production. This does not include returning disturbed areas to pre-disturbance conditions, which would take longer given arctic vegetation does not regenerate quickly, extending the timeline for reclaiming disturbed areas. This is evidenced by the time it is taking disturbances to recover from seismic testing in 1984 and 1985. Due to the time needed for disturbed areas to return to pre-disturbance conditions, surface disturbances could be visible for decades.

Alternative C

Under Alternative C, seismic exploration would only be allowed in areas available for lease sale (1,037,200 acres) rather than across entire program area as under Alternative B. The impacts are described above under *Impacts Common to All Action Alternatives*.

The impacts on visual resources would be similar to Alternative B; however, Alternative C would occur in different locations, compared with Alternative B; see **Map 2-3** and **Map 2-4** in **Appendix A**. For example, in the long term, two CPFs would be built, one in the high potential area and one in the medium potential area south of Kaktovik. According to the hypothetical development scenario provided in **Appendix C**, there would be 1,464 acres of estimated disturbance. The largest portion of surface disturbance would be from 1,005 acres of gravel roads totaling 134 miles that would be needed to connect facilities (see **Table C-5**). Surface occupancy prohibitions would minimize but not prevent impacts on visual resources associated with, for example, rivers and wilderness areas, which is more than Alternative B.

Alternative C would also have a smaller total area of disturbance than Alternative B because the leasable area would be limited to 1,037,200 acres and the total surface disturbance estimated to occur would be 1,464 acres (see **Table 2-1**, Quantitative Summary of Lease Stipulations by Action Alternative). It is important to note that pipeline VSMs are counted toward the total disturbance limit, but the spans are not. Under Alternative C, there would be 175 miles of pipelines that would also contribute to altering the visual landscape.

To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary (Lease Stipulation 10). This would minimize but not prevent visual intrusions in the overall landscape created by the presence of aircraft.

Alternative D

Under Alternative D, seismic exploration would only be allowed in areas available for lease sale (765,800 acres) rather than across entire program area as under Alternative B. The impacts are described above under *Impacts Common to All Action Alternatives*.

The impacts on visual resources would be similar to Alternative B; however, Alternative D would occur in different locations compared with Alternative B; see **Map 2-5** and **Map 2-6** in **Appendix A**. For example, in the long-term, one CPF is expected to be built. Possible locations are the areas open for leasing under STC in the high and medium hydrocarbon potential areas. There would also be only one seawater treatment plant. According to the hypothetical development scenario provided in **Appendix C**, there would be 1,040 acres of estimated disturbance. The largest portion of surface disturbance would be from 735 acres of gravel roads totaling 98 miles that would be needed to connect facilities (see **Table C-5**). Surface occupancy prohibitions would minimize, but would not prevent, impacts on visual resources associated with, for example, rivers and wilderness areas, which is more than Alternative B.

Alternative D also would have a smaller total area of disturbance than Alternative B because the area available for lease sale would be limited to 765,800 acres and total surface disturbance would be estimated at 1,040 acres. (See **Table 2-1**, Quantitative Summary of Lease Stipulations by Action Alternative.) It is important to note that pipeline VSMs are counted toward the total disturbance limit, but the spans are not. Under Alternative D, there would be 120 miles of pipelines that would also contribute to altering the landscape.

Alternative D would also have different lease stipulations and ROPs than Alternative B that would preserve visual resources. To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary (Lease Stipulation 10). Also, areas north of the Mollie Beattie Wilderness Area would not be offered for lease and would not be available for surface occupancy. This would minimize, but not prevent visual intrusions in the overall landscape created by the presence of aircraft under Alternative D.

The BLM and USFWS Authorized Officers must approve a Master Development Plan for each field development. Master plans shall address compact design and Operators shall design all surface infrastructure with the smallest possible practical footprint (Lease Stipulation 13). This would minimize the areal extent of development and redundant infrastructure by a single operator and among multiple operators under Alternative D.

Alternative D2

Under Alternative D2, seismic exploration would only be allowed in areas available for lease sale (400,000 acres) rather than across entire program area as under Alternative B. The impacts are described above under *Impacts Common to All Action Alternatives*.

The impacts on visual resources would be similar to Alternative B; however, Alternative D2 would occur in different locations compared with Alternative B; see **Map 2-7** and **Map 2-8** in **Appendix A**. For example, in the long-term, one CPF is expected to be built. Its location would be constrained to the acreage not encumbered by the Alternative D2 Stipulation 4 or 6. There would also be only one seawater treatment plant. According to the hypothetical development scenario provided in **Appendix C**, there would be 995 acres of estimated disturbance. The largest portion of surface disturbance would be from 735 acres of gravel roads totaling 98 miles that would be needed to connect facilities (see **Table C-5**). Surface occupancy prohibitions would minimize, but would not prevent, impacts on visual resources associated with, for example, rivers and wilderness areas, which is more than Alternative B.

Alternative D2 also would have a smaller total area of disturbance than Alternative B because the area available for lease sale would be limited to 400,000 acres and total surface disturbance would be estimated at 995 acres. (See **Table 2-1**, Quantitative Summary of Lease Stipulations by Action Alternative.) It is important to note that pipeline VSMs are counted toward the total disturbance limit, but the spans are not. Under Alternative D2, there would be 110 miles of pipelines that would also contribute to altering the landscape.

Alternative D2 would also have different lease stipulations and ROPs than Alternative B that would preserve visual resources. To the extent practicable, aircraft operations would be planned to minimize flights below 2,000 feet when flying within 3 miles of the Mollie Beattie Wilderness Area boundary (Lease Stipulation 10). Also, areas north of the Mollie Beattie Wilderness Area would not be offered for lease and would not be available for surface occupancy. This would minimize, but not prevent visual intrusions in the overall landscape created by the presence of aircraft under Alternative D2.

The BLM Authorized Officer, in coordination with the USFWS as the surface manager, must approve a Master Development Plan for each field development. Master plans shall address compact design and Operators shall design all surface infrastructure with the smallest possible practical footprint (Lease Stipulation 13). This would minimize the areal extent of development and redundant infrastructure by a single operator and among multiple operators under Alternative D2.

Transboundary Impacts

As described above, construction and operations under the action alternatives would add light and glare and would increase skyglow, which would diminish the quality of dark skies and affect animal behaviors that are seen in the program area. Depending on the location of post-lease construction and operations, artificial light, glare, and skyglow could potentially extend into Canada, diminishing the quality of dark skies and affecting animal behaviors beyond the program area. The potential for impacts would increase the closer construction and operations are to the eastern boundary of the program area and would be long term. These impacts would not occur under Alternative A.

Cumulative Impacts

The program area is the geographic scope of the analysis area for cumulative impacts. Impacts on visual resources in the program area from past actions occurred from the 1984–1985 seismic exploration. About 125 miles of disturbed trail remained in 2009, based on a total length of about 2,500 miles of original trails (both seismic lines and camp-move trails) (USFWS 2014). The remaining trails created visible lines and faint variations in texture across the undeveloped landscape. Future seismic exploration could have more visible impacts on visual resources, because the trails would be several hundred feet apart, instead of 3 to 4 miles apart during the 1984–1985 testing.

Impacts on visual resources in the program area from future actions could occur. Future oil and gas actions and community development and infrastructure projects would add activities and artificial structures to undeveloped and developed areas, which would cause impacts similar to those described above. Air, land, and marine transport associated with oil and gas activities and traffic associated with coastal communities on the North Slope would also add activities in and around the program area and fragment the landscape by new roads and trails. Use of oil and gas has been documented to change climates, and increasing air temperatures have long-term impacts on landscapes such as the Coastal Plain where permafrost thaw would degrade vegetation growing conditions and landscape conditions for wildlife seen in the area.

The direct and indirect impacts under the action alternatives would contribute to cumulative impacts on visual resources in the program area. Given the durations of the action alternatives and the extent and location of

construction and operation, the cumulative impacts on visual resources from the action alternatives would overshadow all other cumulative impacts on visual resources within the Coastal Plain. The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the cumulative impacts. Alternative A would not contribute to cumulative impacts on visual resources as there are no direct or indirect impacts under that alternative.

3.4.9 Transportation

Direct and Indirect Impacts

The reasonably foreseeable development scenario (**Appendix C**) identifies five phases associated with the hypothetical baseline scenario: leasing, exploration, development, production, abandonment and reclamation.

During the leasing phase, under the directives of Section 20001(c)(1) of PL 115-97, there would be no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. Impacts are likely during the exploration and development phases of oil and gas activities. Roadways may be developed to support construction of long-term infrastructure. During the production phase, oil and gas would be transported in and from the Coastal Plain. Some roadway expansion may occur during the production phase to support the development of new exploratory drill sites. Finally, during the abandonment and reclamation phase, developers would likely use existing roadways from the previous phases of development to reclaim the area.

Potential impacts on transportation would be from management that increases or decreases opportunities for new transportation infrastructure, management of the timing, location, and type of vehicle use, and from changes in the level of public and subsistence use access in the program area. The magnitude, duration, and spatial extent of impacts on transportation would vary, based on the location and extent of transportation infrastructure, season and snow cover conditions, and other management, such as seasonal TLs for certain uses that would modify the nature of travel via certain modes.

Protective measures that specify the type and placement of new or expanded transportation infrastructure would affect the size, design, and location of the proposed infrastructure. Lease stipulations that limit the placement of permanent transportation infrastructure, depending on season and snow cover conditions, would seasonally reduce private transportation opportunities for oil and gas development, while minimizing potential conflicts with the public and subsistence users.

Management that limits vehicle use based on location, vehicle type, or season can limit or preclude access for certain travel modes while increasing access for others. For example, seasonal or location-specific limitations on vehicles used for mineral development would minimize the potential for impacts on other travel modes used for subsistence uses or recreation.

New transportation infrastructure, such as seasonal or year-round roads, airstrips, or other facilities, would not be available for motorized public use. Accordingly, new infrastructure would have the potential to enhance nonmotorized public access; however, program-related roads would be available only for private industry access and subsistence use only so new infrastructure would not enhance public access. The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the direct and indirect impacts.

Alternative A

Under Alternative A, no oil and gas leasing program would take place in the program area; there would be no potential direct or indirect impacts on transportation from oil and gas activities in the program area. Existing resource trends and impacts on transportation would continue to occur.

Impacts Common to All Action Alternatives

Under all action alternatives, there would be no direct impacts from leasing on transportation; however, lease sales would result in subsequent gravel and ice roads, airstrips, fueling stations, and a barge landing area to support new oil and gas development. In areas subject to NSO, new roads, airstrips, and other transportation-related infrastructure would be precluded, unless they are essential pipelines and road crossings in accordance with PL 115-97. Under all action alternatives, there would be no gravel roads constructed during the exploratory drilling phases; potential direct and indirect impacts described above associated with gravel roads would occur only in the long term. All action alternatives would expand the transportation network in the program area, but they would be restricted to oil and gas-related use and could create barriers and decrease the level of access for the public; however, roads could be seasonally available for subsistence users.

Under all alternatives, lease stipulations (see **Table 2-3**) would limit the number of new roads to the amount necessary to support production activities. Protective measures would also require the free movement of caribou and subsistence users. These measures would maintain access for subsistence users; however, because transportation infrastructure would be closed to non-subsistence public users, there would be no increase in public access and no increased connectivity with developed areas. In some areas, roads may obstruct cross country, over snow travel via other modes, or nonmotorized travel, such as skiing or hiking. Compared with Alternative A, there would be no change in public access from the construction of private landing strips.

Under all action alternatives, the amount of barge traffic may increase from the leasing program. With oil and gas development, the amount of barge traffic would likely increase through the longevity of the production phase. Barges may experience congestion along traditional transportation routes from increased activity. During the abandonment and reclamation phase, barge transportation would likely reduce to traditional levels. As described in **Appendix C, Table C-3**, mapping coastal areas for likely barge landing and marine infrastructure locations would occur within three years after lease sale.

Alternative B

Under Alternative B, anticipated transportation infrastructure development and associated potential impacts following lease sales would be as described under *Impacts Common to All Action Alternatives*. During the exploration phase, developers would rely on ice roads to access exploratory drill sites. Making available 1,563,500 acres for lease sales, 77 percent (1,205,400 acres) of which would be available for surface use, would allow for the construction of program-related roads throughout nearly the entire program area during the development and production phases. Of these acres available for surface use, 585,400 acres would be subject to TLs, which could influence the type, location, or design of transportation infrastructure. Impacts from the construction of gravel roadways would begin the development phase and would climax in the production phase as developers expand prospected drill sites. About 172 miles of new gravel roadways would support private travel for oil and gas production to connect facilities, while ice roads would provide additional private access for exploratory drilling and would be the primary means of overland access during the winter and spring for developers.

Alternative C

Under Alternative C, not offering 526,300 acres for lease sale and applying NSO stipulations (Lease Stipulations 1, 2, 3, 4, 5, 7, 9, and 10) to 45 percent (708,200 acres) of the area available for lease would limit the locations where new roads and other transportation infrastructure could be placed during the development and production phases. Compared with Alternative A, there would be no change in transportation conditions on approximately 1,234,500 acres (79 percent) of the program area that would either not be offered for lease sale or offered but managed as NSO. The nature and types of potential impacts described under *Impacts Common to All Action Alternatives* would be in the 329,000 acres (32 percent of leased areas; 21 percent of the program area) available for leasing with surface use (both subject to STC and CSUs). About 134 miles of new gravel roadways would support private travel for oil and gas production to connect facilities, while ice roads would provide additional private access for exploratory drilling and would be the primary means of overland access during the winter and spring for developers. New gravel roadways under Alternative C would be slightly less than under Alternative B.

Alternative D

Under Alternative D, 51 percent of the leasing area (797,700 acres) would not be available for lease sale and NSO stipulations (Lease Stipulations 1, 2, 3, 4, 7, 9, 10, and 12) would apply to an additional 46 percent (726,300 acres). This would limit the locations where new roads and other transportation infrastructure could be placed during the development and production phases. Compared with Alternative A, there would be no change in transportation conditions on approximately 1,524,5000 acres (97 percent) of the program area that either would not be offered for lease sale or managed as NSO. The nature and types of potential impacts described under *Impacts Common to All Alternatives* would be in the 39,500 acres (6 percent of the leased areas and 3 percent of the program area) available for leasing with surface use. Of these acres available for surface use, 1,800 acres would be subject to TLs, which could influence the type, location, or design of transportation infrastructure. About 100 miles of new gravel roadways would support private travel for oil and gas production to connect facilities, while ice roads would provide additional private access for exploratory drilling and would be the primary means of overland access during the winter and spring for developers. This would involve fewer miles than Alternatives B and C.

Alternative D2

Amongst the action alternatives, impacts to transportation would be greatest under Alternative D2. With greater protection of key resources and prioritizing leasing in only high hydrocarbon potential areas, this alternative has the fewest acres of the program area available for leasing (400,000 acres or 26 percent). This would limit the locations where new roads and other transportation infrastructure could be placed during the development and production phases to a greater extent than the other action alternatives. Similar to Alternative D, about 98 miles of new gravel roadways would support private travel for oil and gas production to connect facilities. Ice roads would provide additional private access for exploratory drilling and would be the primary means of overland access during the winter and spring for developers.

Cumulative Impacts

Cumulative impacts on transportation would be the result of past, present, and reasonably foreseeable future actions that would increase or decrease opportunities for new transportation infrastructure, change the types of vehicles available for use, or change the level of public and subsistence use access in the program area. Past, present, and reasonably foreseeable future actions described in **Appendix G** that would cumulatively affect transportation include construction of new infrastructure that would limit or expand public or subsistence access, and expansion of areas unavailable for new transportation infrastructure or seasons or other timing related restrictions on access.

Impacts on transportation may increase from future oil and gas-related development near the program area. Projects such as the Alaska LNG and Willow may affect transportation near the program area by increasing gravel roadway networks and use. Vehicle access to the program area is primarily via the Dalton Highway, and increasing oil and gas activity in Alaska may increase congestion and travel times. Community Development and Infrastructure Projects may have some countervailing effects as smaller projects resulting in community growth could further increase demand for roads, which would increase transportation access. The implementation of the ASTAR Program (see **Appendix G Section G.3.2.**) may also have countervailing effects on transportation by identifying infrastructure opportunities that provide the most cumulative benefit for the region. Additionally, the ROW application (ANILC 1110(b)) that was provided to the USFWS may also provide countervailing effects on transportation with additional snow trails in the program area, if approved.

As described in **Appendix C, Section C.7.3**, Camden Bay has been identified as the most likely location for barge landing but Point Thompson could be another option for barge landing. Marine vessel traffic along the potential marine vessel transportation route, shown on **Map C-2 in Appendix C**, would have some additive effects on the congestion of marine vessel traffic. An average of two barge transports per year is anticipated but the number of transports would vary based on ice conditions and the large equipment needed for upcoming development phases, as discussed in **Appendix C, Section C.7**. Speculation on the location and level of marine vessel traffic is beyond the scope of this analysis. Additionally, the joint lead agencies do not have the authority to regulate marine vessel traffic outside of the Coastal Plain. Therefore, it is difficult to quantify specific impacts on marine vessel traffic and congestion.

Under all action alternatives, future oil and gas exploration and development, combined with increased visitation, would increase the potential for roads and other infrastructure to conflict with public access. These potential conflicts would be more likely along river corridors and the Beaufort Sea coastline, where visitor concentrations are highest. The effects of climate change on the availability of ice roads described under *Affected Environment* (**Appendix B**), could provide an additive effect on influence the rate or degree of the potential cumulative impacts.

3.4.10 Economy

Direct and Indirect Impacts

Direct impacts from issuing oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would include the federal government receiving bonus bids and rental payments from leasing; however, these payments cannot be quantified because there is not enough specificity at this time regarding the lease terms. There would be no other direct impacts on the environment from leasing because by itself a lease does not authorize any on-the-ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and production and transportation of oil and gas from the Coastal Plain. The analysis presented in this section considers potential impacts on the economy from on-the-ground activities.

The potential economic impacts are quantified with respect to jobs, income, and government revenues. As noted in *Affected Environment* (**Appendix B**), quantifying nonmarket values associated with the Arctic Refuge is not part of this analysis. The evaluation of potential impacts on the physical environment, biological

resources, and other social systems, such as cultural resources, subsistence, recreation, visual resources, and public health, are provided in other sections of this SEIS.

The temporal scope of the economic analysis covers potential impacts of leasing activities as well as the subsequent exploration, development, and production activities that could ensue following the leasing program through 2050. The potential economic effects of reclamation and abandonment are also estimated, although the time frame for these activities is expected to be beyond the year 2050.

The effects of climate change described under *Affected Environment* (**Appendix B**), could influence the rate or degree of the potential direct and indirect impacts.

Alternative A

Under Alternative A, no federal minerals in the Coastal Plain would be offered for future oil and gas lease sales. Therefore, there would be no direct or indirect economic impacts under this alternative from leasing and oil and gas activities. The economic conditions at the local, regional, and state level, as discussed in *Affected Environment* (**Appendix B**), are expected to continue along current trends. The non-use and passive use values of the Coastal Plain and its other ecosystem service values (although not quantified in this analysis) would maintain their current value and would not be diminished by oil and gas leasing and subsequent development.

Impacts Common to All Action Alternatives

This section focuses only on the potential economic impacts common to all action alternatives of future unconstrained post-leasing activities by the oil and gas industry; these are considered indirect effects of the issuance of leases in the Coastal Plain. This section does not quantify impacts on other resources such as subsistence, recreation, air quality, public health, or any other resource discussed in other sections of **Chapter 3**. The relative effects of the different lease stipulations and required operating procedures being considered under each of the action alternatives are discussed separately in subsequent sub-sections.

For this SEIS, the potential economic effects of the proposed leasing program are evaluated based on a hypothetical development scenario, which is a set of assumptions that reflect possible industry-wide exploration, development, and production activities. The scenario represents only a possible picture of the future. It is likely that different activities and timing would occur in the future, as each company that would participate in the leasing program would have its own unique plans about how to identify and recover oil and natural gas resources. Furthermore, market conditions change over time and can affect outcomes. It is difficult to anticipate what the actual development pattern would be, but the assumptions used in this analysis provide a reasonable basis to evaluate potential future economic effects. A more detailed description of the hypothetical scenario is provided in **Appendix C**.

For the purposes of this analysis, the projected potential economic impacts (based on the hypothetical scenario) are carried through the year 2050 only. Within this time frame, only two anchor fields would be developed, with each one having its own CPF. A third CPF could be developed by 2050 but production would occur after 2050. Abandonment activities would also occur after this time frame. The first anchor field is assumed to have about 400 million barrels of proven producible reserves. Six smaller satellite fields would be developed around the first anchor field, with more modest producible reserves of about 100 million barrels each. The assumption is that the second anchor field would be discovered and developed several years after the first anchor field and would have four smaller satellite fields that would be developed by 2050 and tie into its CPF. The exploration phase of each anchor field and associated satellite fields can occur over a span of 10 years. Exploration includes seismic surveys, well-site surveys, and drilling of exploration wells. Note that

before the first lease sale, initial 3D seismic exploration surveys could also occur. Following discovery, the development phase normally takes 3 to 6 years. Development includes obtaining permits, fabricating production modules, constructing roads, pipelines, and other on-site facilities, transporting materials and facilities to the site, and implementing environmental studies and monitoring. The production phase can start after development of a CPF and would continue until the end of life of each oil field. Production activities are the continued development-well drilling, production ramp-up, operations and maintenance of processing and other on-site facilities, well-workovers, infill drilling, and other support activities, including environmental monitoring. For a more detailed discussion of the typical exploration, development, and production activities occurring in the Alaska North Slope, see the NPR-A IAP/EIS (BLM 2012), which is incorporated here by reference.

A future natural gas transport pipeline from the North Slope to southcentral Alaska could be expected, where the gas would be transformed into liquefied natural gas. Liquefied natural gas transported to global markets from the North Slope would be expected to come from established fields with proven reserves initially. If proven gas resources are discovered in the Coastal Plain, they would be transported to the pipeline to maintain pipeline capacity as the primary fields are depleted. Companies exploring the Coastal Plain would likely focus on crude oil discoveries, which are of higher value than natural gas. Any co-occurring gas produced with oil would be reinjected to maintain reservoir pressure. Co-occurring natural gas liquids could be separated to blend in and transport with the oil.

The following are the major assumptions and data sources used in the economic impact analysis:

- The hypothetical unconstrained development scenario (**Appendix C**) provided the basis for modeling the potential oil and gas activities and time frames, which included assumptions of the number of CPFs, gravel roads and ice road construction, other on-shore facilities, including pipelines, and size of oil field discoveries.
- Estimates of production volumes by year were based on the size of each oil field and a production decline rate of 8 percent per year. This information was used to calculate potential royalty payments and other State and the federal government tax payments.
- Oil price projections were obtained from the Energy Information Administration's 2023 Annual Energy Outlook (EIA 2023). This information was used to quantify potential royalty payments and other fiscal effects.
- Construction costs were estimated based on costs provided in Attanasi and Freeman (2009) and cost data from other North Slope development projects. The capital costs were adjusted to 2022 dollars using the Upstream Capital Cost Index (UCCI)¹⁵. This information was used to calculate direct and indirect employment and income effects of construction spending as well as potential government revenues, including oil and gas property taxes and state corporate income taxes.
- Estimates of annual operating expenditures are based on the prevailing operating costs in the Alaska North Slope—a fixed \$/well/year estimate of \$450,000 and a variable operating cost component of \$10 per barrel of oil. The default value for the fixed cost per well in the ADNRC cash flow model¹⁶ was adjusted to account for the greater distance from Prudhoe Bay. This information was used to

¹⁵The Upstream Capital Costs Index (UCCI), formally known as IHS/CERA upstream capital costs index, is a proprietary index of the rate of inflation seen in the costs associated with the construction of a global portfolio of 28 upstream oil and gas projects. It tracks the composite capital cost of materials, facilities, equipment, and personnel for oil and natural gas producing projects.

¹⁶ADNRC 2023.

calculate the direct and indirect employment and income effects, as well as tax revenues during the production phase.

- Tariffs and transportation costs were used to calculate netback prices which are the bases for calculating royalty payments. Data on existing tariffs and transportation costs are from the ADOR Fall 2022 Revenue Sources Book (ADOR 2022).

The cash flow model developed by the ADNDR (modified to fit the development and production assumptions used in this analysis) was used to generate the projected royalties and government taxes (ADNDR 2023). The IMPLAN input-output model for Alaska was used to estimate the employment and income effects of the various exploration, development, and production activities (MIG, Inc. 2023).

As pointed out earlier, the economic effects of post-leasing activities are considered indirect effects of leasing. It should be noted here, however, that in input-output analysis, the terms “direct” and “indirect” effects are also used to describe the different levels of effects that are caused by an economic activity. In this section, all the economic effects presented are indirect effects of leasing, but the term “direct effects” is used to refer to the immediate economic consequences of the direct spending associated with the post-leasing activities (including exploration, development, and production), and the term “indirect effects” is used to refer to the secondary consequences that occur through the supply chain (such as, jobs and income created by the businesses that supply goods and services to the oil and gas companies) as well as the induced effects that are generated when workers spend their income in the economy. These indirect effects are also commonly referred to as multiplier effects in economics.

The economic consequences resulting from impacts on other resources are not quantified in this section. For example, subsistence activities could have impacts on cost of living for some families through the need to substitute store-bought foods for subsistence obtained foods. The potential impacts on subsistence are discussed in **Section 3.4.3**. Impacts on recreational resources could also have impacts on businesses that provide recreation in the area; the potential impact on recreation is discussed in **Section 3.4.6**. Finally, oil production would have associated greenhouse gas emissions and would result in climate changes and impacts on air quality and public health. The impacts on air quality and public health are discussed in **Section 3.2.2** and **Section 3.4.11**, respectively.

The social costs of greenhouse gas emissions are presented in **Appendix G, Section G.2.1, *Social Costs of GHG Emissions***. The estimated monetary values of the potential changes in GHG emissions that could result from the action alternatives range from \$30 billion to \$91 billion under Alternative B, from \$28 billion to \$85 billion under Alternative C, from \$12 billion to \$36 billion under Alternative D, and from \$10 billion to \$29 billion under Alternative D2. The lower bound of the range of estimates reflects average damages assuming a 2.5 percent discount rate and the upper bound represents a higher-than-expected damage scenario (95th percentile of damages estimated) assuming a 1.5 percent discount rate (see **Table G-1 in Appendix G**).

Jobs

Future exploration, development, and production activities in the program area for the two anchor fields and their associated satellite fields are estimated to generate about 250 direct jobs per year during exploration activities, 2,260 direct jobs per year during the development phase, and 770 direct jobs per year during the production phase. Exploration activities are anticipated to peak in the fifth year of the exploration phase, generating an estimated 650 jobs that year. The peak year of the development phase is estimated to generate 3,300 jobs, and 1,200 jobs are estimated to be required during the peak production year. Jobs during the exploration and development phases are seasonal and temporary, while production phase jobs are year-round

and would last through the economic limit of the life of each oil field. **Table 3-38** also provides estimates of the indirect jobs that could be generated as a result of industry spending on exploration, development, and production activities.

Table 3-38
Projected Employment Effects of the Hypothetical Unconstrained Post-Leasing
Exploration, Development, and Production Activities

Effects	Jobs (Average Number of Part-Time and Full-Time Jobs)	Annual Average	Peak
Direct	Exploration	250	650
	Development	2,260	3,300
	Production	770	1,200
Indirect	Exploration	130	390
	Development	1,720	2,500
	Production	1,020	1,600

Source: Estimates based on IMPLAN 2021 data year and assumptions listed in the section- *Impacts Common to All Action Alternatives*.

Notes:

Jobs during the exploration and development phases are seasonal and temporary.

“Direct effects” refer to the immediate economic consequences of the direct spending associated with the post-leasing activities (exploration, development, and production), and “indirect effects” refer to the secondary consequences that occur through the supply chain (i.e. jobs and income created by the businesses that supply goods and services to the oil and gas companies) as well as the induced effects that are generated when workers spend their income in the economy. In this SEIS, both the direct and indirect effects of post-leasing activities are considered indirect effects of leasing in the Coastal Plain.

Abandonment and reclamation activities that would occur at the end of the economic life of each of the fields are also going to generate jobs. The total estimated direct jobs for abandonment and reclamation per anchor field is about 500 jobs and an additional 380 indirect jobs. Each satellite field, on the other hand, is estimated to generate 150 direct jobs and 100 indirect jobs during reclamation and abandonment. The assumed future exploration, development, and production activities are expected to generate job opportunities for workers residing in the North Slope, other areas of Alaska, and outside Alaska. The jobs shown in **Table 3-38** are total jobs that could be available for workers from any region, including outside Alaska. It is uncertain at this time how many workers from North Slope communities would participate in the direct oil and gas activities. Historically, very few North Slope residents have participated in direct oil and gas activities in the North Slope. As noted in *Affected Environment*, above, only 0.2 percent of the total oil and gas jobs in the North Slope in 2022 were held by NSB residents.

In 2021, 28.8 percent of the workers in the oil and gas extraction sector and 38.6 percent of the workers in oil field services sector were from out of state (ADOLWD 2023c). These nonresident percentages have been consistent in the last decade, and it is possible that these levels would continue; however, it is also possible that, with more education and training, the future composition of the oil and gas workforce could be different.

Oil field development projects in the North Slope typically require specialty tradesmen and construction workers with the skills and experience in ice roads, pipeline construction, facilities construction, and drilling. North Slope residents who live near existing oil developments have participated in oil and gas jobs, such as ice road monitors, camp security and facilities operators, and subsistence representatives. The ADOLWD and the oil and gas industry have training programs geared to developing special skills required in oil field services. This is expected to create more employment opportunities for residents of Kaktovik, given their proximity to the program area.

Population

No changes to population growth rates or increased population are expected in Kaktovik as a result of migration of industry workers for oil and gas activities. Workers are expected to commute to the work camps on a rotational basis and are not expected to relocate to Kaktovik or other North Slope communities.

At the state level, there could be potential increases in population, particularly in south-central Alaska, as nonresidents who would be working year-round at the oil company headquarters in Anchorage are expected to relocate to the region. Statewide population, however, would be affected by other economic and demographic factors and would be hard to predict.

Labor Income

The estimated labor income effects resulting from future exploration, development, and production of oil resources in the Coastal Plain region are presented in **Table 3-39**. The table shows projected direct and indirect annual average and peak labor income by phase.

Table 3-39
Projected Labor Income Effects of the Hypothetical Unconstrained Post-Leasing Exploration, Development, and Production Activities

Effects	Labor Income (Millions of Dollars 2022)	Annual Average	Peak
Direct	Exploration	\$26	\$67
	Development	\$233	\$339
	Production	\$133	\$210
Indirect	Exploration	\$8	\$24
	Development	\$106	\$154
	Production	\$64	\$101

Source: Estimates based on IMPLAN 2021 data year and assumptions listed in the section- *Impacts Common to All Action Alternatives*.

Note: "Direct effects" refer to the immediate economic consequences of the direct spending associated with the post-leasing activities (exploration, development, and production), and "indirect effects" refer to the secondary consequences that occur through the supply chain (i.e. jobs and income created by the businesses that supply goods and services to the oil and gas companies) as well as the induced effects that are generated when workers spend their income in the economy. In this SEIS, both the direct and indirect effects of post-leasing activities are considered indirect effects of leasing in the Coastal Plain.

As noted above, it is uncertain at this time how much of this total potential labor income would accrue to the local, regional, and Alaska workforces. Currently, about 27.8 percent of the total wages and salaries in the oil and gas extraction sector and 47.9 percent of wages and salaries in the oil field services sector go to out-of-state workers (ADOLWD 2023c). It is possible that these percentages could change over time.

Economic Sectors

Industry spending during future exploration, development, and production phases would increase the level of activity in the Alaska economy, not just in the oil and gas extraction sector but also in other economic sectors, including oil field support services; construction, engineering, environmental, and other professional technical services; air, water, ground, and pipeline transportation sectors; retail and wholesale trade sectors; rental and leasing sectors; warehousing; accommodations and food services; and communications, IT support, management, and other business support sectors.

Like other development projects in the North Slope, many of the materials and equipment are expected to be purchased outside Alaska and shipped to the specific job site. Still, a significant portion of the total future development costs, both capital and operating costs, would be paid to companies in Alaska for construction,

transportation, logistics, and other oil field services.¹⁷ Some of the contracts for construction and operations and maintenance of the facilities are expected to be awarded to Alaska-owned and operated companies, including the North Slope regional and village ANCSA corporations. These payments to local businesses would in turn generate additional economic activity in the state, resulting in indirect economic effects in the form of additional business sales, employment, and labor income. Likewise, potential local spending by workers as well as government spending of revenues would also generate multiplier effects statewide.

Resource development in the program area could spur additional development in adjacent areas, including on Native-owned land. This in turn could generate revenue for landholders and businesses in the various sectors noted above. This includes the ASRC and KIC, which are engaged in the oil and gas services sector, and it would further increase job opportunities for residents.

Finally, businesses that provide services to visitors or recreationists in the area could be adversely impacted. As noted in *Section 3.4.6 Recreation*, the main recreation activities that draw people into the region include wildlife viewing, camping, backpacking, hiking, photographing, hunting, fishing, and boating. Polar bear viewing and ski touring are also popular. These recreation opportunities could be displaced by oil exploration, development, and production activities. For example, oil and gas activities in proximity to priority recreation areas could change the recreation setting by introducing visual and auditory changes to the landscape and minimizing the recreation experience by visitors.

Government Revenues

Future petroleum development in the program area is expected to generate revenues to the NSB government, the State, and the federal government from royalties, income taxes, production taxes, and property taxes. The projected annual average and total government revenues by type of revenue are presented in **Table 3-40**. The total represents the estimated revenues through 2050. Property taxes would start accruing during the development or construction phase, while royalties and other taxes would be generated during the production phase.

Table 3-40
Projected Government Revenues based on the Hypothetical Unconstrained Post-Leasing Activities

Government Revenues (in Millions of Dollars, 2022)	Annual Average	Total
North Slope Borough Property Taxes	\$49	\$1,119
State of Alaska Royalties	\$782	\$15,648
State of Alaska Taxes	\$1,220	\$24,425
Federal Royalties	\$782	\$15,648
Federal Taxes	\$673	\$13,459

Source: Estimates based on assumptions listed in the section- *Impacts Common to All Action Alternatives*.

¹⁷The amount of direct in-state industry spending is based on purchase coefficients contained in the Alaska IMPLAN model. These in-state purchase coefficients reflect the availability of locally produced products in the State and are calculated from the trade model for the State in IMPLAN. The extraction of natural gas and crude petroleum sector, drilling oil and gas wells sector, and support activities for oil and gas operations sector require or demand different goods and services from other sectors of the economy. All have varying percentages of in-state purchases, with the highest percentages in the services sector and the least in the manufacturing sectors. There is not one specific in-state purchase percentage applied to the total direct oil and gas industry spending; rather, the purchase coefficients in the model vary by the type of goods and services purchased.

At the local level, the City of Kaktovik could receive increased bed tax revenues with higher hotel occupancy during the initial years of development. Also, local consultations are likely going to occur while mobilization of construction equipment would be occurring, and even during operations. The City of Kaktovik has a 12 percent bed tax for hotel/motel accommodations. The change in the level of hotel occupancy is difficult to quantify at this point because the timing and number of local consultations and mobilization activities are uncertain and may vary.

At the regional level, the NSB government is anticipated to receive increased property tax revenues. Property tax payments would start to accrue during the construction phase. The State imposes oil and gas property taxes at a rate of 20 mills.¹⁸ A local tax is levied on the State's assessed value for oil and gas property in the borough and is subject to local property tax limitations. The current NSB property tax rate is 17.99 mills (the State portion of the property tax is 2 mills). Total NSB property tax revenues through 2050 are estimated to amount to over \$1 billion (in 2022 dollars).

The increase in NSB government revenues would benefit residents of the NSB since revenues would go toward providing public services in the communities like education, health care and critical infrastructure. In addition, there could be increased income resulting from ANCSA corporation dividends that would also benefit residents of the NSB communities. In contrast to the NSB, the residents of the YKCA as a whole are not expected to experience beneficial economic impacts from the leasing program because areas within Alaska's unorganized borough lack authority to levy taxes. Moreover, Arctic Village and Venetie are not enrolled in a regional Native corporation and do not have ANCSA village corporations. As such, those communities do not receive any increased economic activity associated with resource development or shares therein by ANCSA corporations.

At the State level, there are several potential sources of revenues that could be generated from petroleum development in the program area. State government revenues during the production phase would include royalty payments, corporate income tax payments, severance tax payments, and continuation of property tax payments. The property tax payments would be based on the assessed valuation of the facilities developed on-site.

As noted above, the State portion of the property tax is 2 mills and is estimated to amount to \$125 million through 2050 (in 2022 dollars). State corporate income tax is calculated as 9.4 percent of the Alaska share of worldwide income for each corporation. The model, however, does not take into consideration corporate worldwide income (which is unknown at this time) but simply evaluates all the costs and revenues and the resulting State income tax, given the 9.4 percent income tax rate.

Severance tax or production tax payments are based on the current tax rate of 35 percent of the production value, which is the value at the point of production, less all qualified lease expenditures (net value). Qualified lease expenditures include certain qualified capital and operating expenditures. Total estimated state taxes and royalties are shown in **Table 3-40**.

Any additional oil production in the North Slope extends the life of the TAPS and increases revenues for the State. Oil revenues depend on the oil production levels and the price of oil at the wellhead. Higher TAPS throughput results in lower pipeline tariffs and higher wellhead value. The State would receive higher revenues resulting from oil production in the region.

¹⁸A mill is a monetary unit worth 1/1,000th of a dollar.

The assumed federal royalty rate is 16.67 percent of the wellhead value for oil. The expectation is that 50 percent of the federal royalties are shared with the State. Potential annual average State royalties could amount to about \$782 million.

Other government revenues expected to accrue during the construction phase include ROW payments and gravel royalties; these estimates are not available at this time.

Local Public Infrastructure and Local Businesses

Given that the oil field workers would be housed in work camps located at the CPFs and drill pads and away from the community of Kaktovik, there would be no anticipated increase in demand for local services and other public infrastructure in the community of Kaktovik.

Consultations and mobilization during leasing, permitting, and exploration and through the development phase could increase the number of people going in and out of the community. These could create temporary increases in demand for accommodations, travel services, retail services, and other personal services.

Local businesses, including KIC and its subsidiaries, could receive greater revenues during the exploration, development, and production of petroleum resources in the program area.

Non-Use and Passive Use Values

The non-use and passive use values of the Coastal Plain and its other ecosystem service values (although not quantified in this analysis) would be diminished from their current value by oil and gas leasing and subsequent petroleum development. This analysis does not estimate the scale of lost non-use and passive use values. However, as noted earlier, an estimated lower bound for the Arctic National Wildlife Refuge is represented by a 2003 Carson et al study showing the public's aggregate willingness to pay to prevent another Exxon Valdez type oil spill, is about \$7 billion (2021 dollars).

Alternative B

The potential economic effects under Alternative B would be similar in magnitude to the economic effects discussed in the section above. There could be unquantifiable differences in the level of economic effects, however, because of the lease stipulations and ROPs under Alternative B, as follows:

- Additional consultations with Tribal Governments, and local, state, and federal stakeholders
- Additional studies that would be required for permitting
- Delays in exploration and development due to closures of certain environmentally sensitive areas
- Reductions in surface disturbance
- Additional facilities that could be required to address limited road access to the CPFs
- Additional infrastructure, such as bridges, that could be required to avoid environmentally sensitive areas.

Some of these actions could result in higher employment and income effects due to additional expenditures that would be incurred to comply with the standard operating procedure, including additional spending on consultation, studies, and required orientation programs. Some of these actions could also result in delays in exploration, development, and production and would therefore also delay potential employment and income effects, as well as revenues that could accrue to the local, State, and federal governments. For example, some of the lease stipulations could result in deferred revenues and taxes due to delays in drilling or lower taxes and revenues due to increased costs, which reduce severance taxes and profits. The stipulations and ROPs that

could affect the timing and magnitude of the economic effects are Lease Stipulations 3 and 4, and ROPs 7, 10, 29, 32, 34, 36, 40, 41, and 46.

Alternative C

The potential economic effects under Alternative C are anticipated to be similar in nature but smaller in magnitude compared to the economic effects discussed in the section above due to higher levels of restrictions under this alternative. The higher level of restrictions could reduce the number of facilities developed and the amount of oil produced through 2050, and therefore could defer or reduce potential government revenues and taxes, and also result in lower employment and income effects, relative to the potential economic effects under the unconstrained scenario and Alternative B. The lease stipulations and ROPs under Alternative C are described in detail in **Chapter 2** of this SEIS.

Alternative D

As in Alternative C, Alternative D would have additional restrictions on development in the Coastal Plain area and, therefore, the potential economic effects under this Alternative D would be smaller in magnitude compared to Alternatives B and C. These additional restrictions include reductions in acreage that would be open to leasing, estimating approximately 1,040 acres (less than the 2,000 acres estimated under Alternative B and 1,464 acres under Alternative C) of surface development throughout the Coastal Plain. Also, prohibiting surface infrastructure in sensitive areas and additional operating procedures that are intended to avoid or mitigate impacts from oil and gas activities. These additional restrictions could result in fewer facilities developed and less oil produced through 2050, and, therefore, they could defer or reduce potential government revenues and taxes resulting in lower employment and income effects, relative to the potential economic effects under the unconstrained scenario, Alternative B, and Alternative C. The lease stipulations and ROPs under Alternative D are described in detail in **Chapter 2** of this SEIS.

Alternative D2

Alternative D2 would have even more restrictions and stipulations compared to Alternative D. Alternative D2 includes additional protections for key resources (including polar bears, caribou, and springs and aufeis) while also prioritizing leasing in only high hydrocarbon potential areas. As a result of these additional restrictions and stipulations in Alternative D2, the hypothetical development is largely constrained to the parcels identified as Standard Lease Terms and Conditions (making up 80,900 acres). Under this alternative, the maximum total oil recovery estimate is approximately 0.4 BBO (compared to 1.9 BBO under Alternative B, 1.4 BBO under Alternative C, and 0.5 BBO under Alternative D). Only three satellite pads are assumed to be built to support the single CPF. Alternative D2 would have the least number of facilities compared to all the other alternatives (see Appendix C, Table C-5 for details regarding the hypothetical projected facilities). Given fewer facilities and less oil produced through 2050 in this scenario, the magnitude of potential economic effects (government revenues, jobs, and income) under Alternative D2 would be lower compared to the magnitude of effects under the unconstrained scenario (Alternative A), Alternative B, Alternative C, and Alternative D. The lease stipulations and ROPs under Alternative D2 are described in detail in **Chapter 2** of this SEIS.

Transboundary Impacts

While transboundary impacts are addressed in other sections of this EIS, they are not included in this economic analysis section. That is because it is focused on evaluating the potential direct and indirect effects of leasing activities on the local, regional, and statewide economy. While post-leasing activities could result in contracts for materials, equipment, and services with companies outside of the US, quantifying these transboundary effects would be too speculative at this time.

Cumulative Impacts

Oil production from the North Slope is projected to increase from 476,500 barrels per day in FY 2022 to 543,300 barrels per day in FY 2032, as production from new development projects are expected to contribute to oil production in the next 10 years, including production from the NPRA, Pikka, and Horseshoe come online (ADOR 2022).

Point Thomson was brought online in April 2016, with production facilities designed to produce and reinject (cycle) 200 million cubic feet per day of gas and produce up to 10,000 barrels per day of natural gas condensate. This project opened up the eastern North Slope to development. Production from this field has increased from 3,100 barrels per day in FY 2017 to 9,000 barrels per day in FY 2022. Production is projected to start to slightly decline in the next ten years with about 7,500 barrels per day in FY 2032.

The Greater Mooses Tooth-1 (GMT1) project is the first commercial development on a federal unit in the NPR-A. Oil production from this field commenced in October 2018. The GMT1 development involves an 11.8-acre drilling pad, with a 7.6-mile-long road, two bridges, and pipelines that connect to Alpine CPF through the existing CD-5 road and pipeline extension. The drilling pad can support up to 33 wells; it currently has seven wells. Recent production from GMT1 has averaged about 2,000 barrels of oil per day (BOPD). The Greater Mooses Tooth-2 (GMT2) is located 8 miles southwest of GMT1. First production occurred in December 2020. The 14-acre gravel pad can support up to 48 wells. The 8.2-mile gravel road and pipeline connect through GMT1 and then on to Alpine CPF. Production is approximately 20,000 BOPD.

The Willow oil and gas prospect is located on Federal oil and gas leases ConocoPhillips holds within the Bear Tooth Unit of the NPR-A, approximately 30 air miles west of Nuiqsut. On March 13, 2023, the Interior Department issued a ROD regarding the proposed Willow Master Development Plan. The Department reduced the size of the project by denying two of the five drill sites proposed by ConocoPhillips. The company will also relinquish rights to approximately 68,000 acres of its existing leases in the NPR-A, including approximately 60,000 acres in the Teshekpuk Lake Special Area. The actions will create an additional buffer from exploration and development activities near the calving grounds and migratory routes for the Teshekpuk Lake caribou herd, an important subsistence resource for nearby Alaska Native communities. The project will include three drill sites, a processing facility, operations center, and an airstrip. Gravel roads will connect to all project infrastructure and will extend from the Greater Mooses Tooth 2 (GMT-2) development southwest toward the Project area. As approved in ROD, the Project will include up to 199 total wells, four valve pads, three pipeline pads, five water source access pads, pipelines to support the infrastructure, and up to three subsistence-use boat ramps. The subsistence-use boat ramps were added to the project by ConocoPhillips as mitigation to help offset project effects on the community of Nuiqsut. Total production from this field is expected to be approximately 576 million barrels.

The combined production from GMT1, GMT2, and the Willow Project in the NPR-A is projected to increase from 9,800 BOPD in FY 2022 to 61,500 BOPD in FY 2032 (ADOR 2022).

Finally, additional production from smaller accumulations of oil in the Kuparuk unit using existing infrastructure is expected to increase from 25,200 BOPD in FY 2022 to 33,900 BOPD in FY 2032 (ADOR 2022). The Kuparuk satellites include Nuna, Tabasco, Tarn, and West Sak.

The oil and gas leasing program and subsequent exploration, development, and production activities in the program area would further increase oil production in the North Slope; increase TAPS throughput, and increase economic activity at the local, regional, and State level due to direct industry spending on labor, materials, and services; increase government revenues from shared royalties, tax payments such as property

taxes, corporate income taxes, severance taxes, and other local taxes; increase job opportunities for Alaskans, including residents of communities in the NSB; and increase labor income in regions where industry spending would occur and where the oil and gas workforce resides.

There would be no additional economic effects under Alternative A since there would be no petroleum development without leasing. The non-use and passive use values of the Coastal Plain and its other ecosystem service values (although not quantified in this analysis) would maintain their current value and would not be diminished by oil and gas leasing development.

The potential cumulative impacts on the economy under the action alternatives would be similar; however, there may be differences in employment, income, and revenues due to differences in how the various lease stipulations under each of the action alternatives would affect industry response and spending. The non-use and passive use values of the Coastal Plain and its other ecosystem service values (although not quantified in this analysis) would be diminished from their current value by oil and gas development. For remote areas such as the Coastal Plain, non-use values are a significant component of the area's total economic value. Its non-use value primarily comes from knowing that the wilderness area exists and continues to be protected and preserved. Any new oil and gas development in this region which would result in construction of industrial infrastructure and an increase in industrial activity would change the nature of the area and the way people think about the wilderness area. The effects of climate change described under *Affected Environment (Appendix B)*, could influence the rate or degree of the potential cumulative impacts. Climate change could adversely affect the economy of the North Slope because villages are primarily located at or near sea level; any increase in mean sea level or violent storms may require relocating part or all of villages and subsistence camps. This would have an adverse economic impact on the villages, the NSB, and the State if villages had to be relocated. Climate change effects could also go beyond the State of Alaska and adversely affect the rest of the world.

3.4.11 Public Health

Direct and Indirect Impacts

Issuance of oil and gas leases under the directives of Section 20001(c)(1) of PL 115-97 would have no direct impacts on the environment because by itself a lease does not authorize any on the ground oil and gas activities; however, a lease does grant the lessee certain rights to drill for and extract oil and gas subject to further environmental review and reasonable regulation, including applicable laws, terms, conditions, and stipulations of the lease. The impacts of such future exploration and development activities that may occur because of the issuance of leases are considered potential indirect impacts of leasing. Such activities could include seismic and drilling exploration, development, and transportation of oil and gas in and from the Coastal Plain; therefore, the analysis considers potential impacts on public health from on-the-ground activities.

Potential impacts on public health and safety from oil and gas activities could stem from a number of different pathways identified in the eight health effect categories.

Alternative A

Under Alternative A, no federal minerals in the Coastal Plain would be offered for future oil and gas lease sales. Alternative A would not establish and administer a competitive oil and gas program for the leasing, development, production, and transportation of oil and gas in and from the Coastal Plain in the Arctic Refuge. Current management actions would be maintained, and resource trends would continue, as described in the

Arctic Refuge CCP (USFWS 2015a). Under Alternative A, no impacts on public health and safety would occur from oil and gas development in the program area.

Impacts Common to All Action Alternatives

This section discusses potential impacts on public health and safety that are common to all action alternatives. The potential public health effects of the proposed leasing program are evaluated based on the hypothetical development scenario (**Appendix C**). It is a set of assumptions that reflect possible industry-wide exploration, development, and production activities. Common types of direct and indirect effects on public health associated with oil and gas development in the program area are changes in subsistence harvest patterns; increased travel time for subsistence harvesting; changes in air and water quality and noise pollution; increases in Kaktovik resident, village of Kaktovik, and NSB revenue; and changes in public health service use and access.

This section does not assess health impacts. It analyzes various leasing alternatives and does not analyze specific developments. Health impact assessments would be used during future NEPA analyses of specific development projects after the lease sales are complete.

Social Determinants of Health

Economic growth and employment that are associated with future resource development can exert impacts on the health of populations. Most income for Kaktovik residents and the NSB would be made during the development and production phases of a potential project (see **Section 3.4.10**). Increased income for Kaktovik residents and families has the potential to improve health through increases in the standard of living, reductions in stress, and opportunities for personal growth and social relationships (BLM 2012); however, there are adverse impacts of economic growth as well. With other oil and gas development in the NSB, increased income and employment have been found to be associated with an increase in social disruption (BLM 2012). Not all residents would experience benefits related to increased employment and income associated with development of the program area.

Most oil and gas industry jobs in the North Slope have gone to transient workers, and oil and gas development in the program area is not expected to directly employ a large proportion of Kaktovik residents. The primary employment and income impacts on Kaktovik residents is anticipated to be indirect as a result of increased revenues to the NSB and village of Kaktovik, which allows for increased program spending and hiring. For a full description of socioeconomic impacts, see **Section 3.4.4**.

No changes are anticipated to rates of infant deaths or low birth rates under any of the action alternatives.

Oil and gas workers would be housed at on-site camps for all stages of development. Camp housing would have restrictions on drug and alcohol use, and interactions between oil and gas workers and Kaktovik residents would be minimal outside of the oil and gas camps. The influx of workers would not be expected to increase drug, alcohol, or tobacco rates for Kaktovik residents.

Oil and gas development may have both beneficial and adverse impacts on mental health. The potential for increased revenue and employment may reduce stress and anxiety, but concerns about environmental contamination, potential impacts on subsistence access and resource availability, health impacts from spills, and other impacts from development, both real and perceived, could increase stress and disease susceptibility for some residents.

Increases in stress could affect many social determinants of health, including substance abuse, domestic violence, and poor maternal and child health, which are already factors in NSB communities, including

Kaktovik. Native women and girls experience substantially higher rates of domestic and other violence than others. Oil and gas development in or near Native communities in the US may raise the already high risk of violence on Native women and girls (ILRC 2018). The strong community ties noted above would possibly lessen some of the stress and reduce impacts. Since only a few Kaktovik residents would work directly for oil and gas operators and housed outside of Kaktovik, impacts on community cohesion and from social isolation should be minimal. Effects on social determinants of health from all stages of oil and gas development are complex. There would be a combination of probable beneficial impacts on nutrition and mental health from increased employment and income, with possible long-term impacts on mental health and general health status from increased stress levels.

Accidents and Injuries

Indigenous populations in the Arctic and elsewhere have very high rates of accidents and trauma. Clinical assessments at the Kaktovik clinic include a high percentage of injuries and accidents (NSB 2012). The high incidence of accidents is partly due to the risks associated with subsistence activities, especially given the hostile environment of northern Alaska (BLM 2012).

Future oil and gas development in the program area has the potential to increase the risk of injuries and accidents during subsistence activities. Oil and gas development in the program area is expected to affect caribou herd movements and to alter subsistence hunting patterns for Kaktovik residents (see **Section 3.4.3**). The disturbance of wildlife by industrial activity is likely to result in hunters traveling farther afield and possibly into unfamiliar terrain to harvest stocks.

Future oil and gas development is not expected to increase the Kaktovik road system from its current extent but would develop permanent and seasonal roads in the program area. If Kaktovik residents have easy access to program-related roads, it is likely that some would use the roads to access subsistence harvesting areas, particularly when overland snowmachine travel is difficult. As oil and gas development expands and access to program roads increases, so would the risk of accidents and injuries due to conflicts between oil and gas traffic and subsistence users on oil and gas roads. The highest potential would be during the development and production phases, where most employees would be in the program area (BLM 2012). ROP 18 requires that all roads developed for an oil and gas project be designed, constructed, maintained, and operated to avoid or minimize impacts on subsistence use (**Table 2-3**).

Under all the action alternatives, the main impact on accidental injuries would result from either altered travel patterns or increased travel time for subsistence activity. Under all the action alternatives, future development of fixed facilities in areas of traditional use is likely to result in voluntary displacement of subsistence. This potential impact would be most significant if large numbers of hunters avoid territory close to Kaktovik. All action alternatives have the same potential for development close to the village of Kaktovik.

Food, Nutrition, and Subsistence Activity

As discussed in detail in **Section 3.4.3**, subsistence hunting and fishing are critically important to communities in the NSB, and these subsistence uses of fish, caribou, and other protein sources are closely tied to public health outcomes in these communities. Under all of the action alternatives, there would be mixed effects on diet and nutrition. Increased incomes may have a beneficial effect on Kaktovik residents' ability to engage in subsistence activities. The increased incomes may provide funds to support subsistence activities and also to increase the ability to purchase foods from the store, thus reducing food insecurity (NSB 2012).

Dietary changes could result from the displacement or contamination of food sources, avoidance or loss of traditional harvesting lands, and increased reliance on store-bought foods. Consumption of traditional foods

is associated with reduced risk of chronic diseases, such as diabetes, hypertension, cardiovascular disease, and stroke (BLM 2012). Store-bought food in rural Alaskan villages tends to have low nutritional value, and the cost of buying nutritious foods is often prohibitively expensive. When subsistence resources become less accessible and people rely more heavily on store-bought foods, the nutritional value of the diet decreases, and the risk of chronic diseases increases. In addition, 10 percent of Kaktovik household heads reported times when there was not enough food for their household (NSB 2015b). Studies have found a variety of adverse health impacts from food insecurity, including obesity, poor psychological functioning among children, poor cardiovascular health, and lower physical and mental health ratings. The costs associated with harvesting subsistence resources, the year-to-year variability in subsistence harvest, and the high cost of store-bought food all contribute to high rates of food insecurity. Increased incomes could provide more resources to support subsistence activities or to purchase food from the store, resulting in improved food security and possibly nutrition. Although store-bought foods can be more costly, these economic impacts might be offset to some degree by increased revenues and an associated increase local spending for consumer foods resulting from oil and gas development. Economic effects are described in greater detail in **Section 3.4.10**. It should be noted, however, that differences exist in the ability of various subsistence communities to offset reductions in access to subsistence resources. Specifically, Gwich'in would be affected to a greater degree from reductions in caribou than Kaktovik, who have access to whales, walrus, and other marine mammals to offset losses in caribou.

The likelihood of impacts on subsistence harvests under all action alternatives is discussed in greater detail in **Section 3.4.3**. Impacts on caribou migratory patterns and avoidance of development areas are expected from oil and gas development. In general, impacts would be greatest during the development phase of projects. Certain types of impact sources, such as construction and seismic noise, would be most likely to occur during the exploration and development phases, whether seismic activity occurred throughout the program area (as under Alternative B), or just those areas open to lease sale (as under Alternatives C and D).

Kaktovik residents are also likely to avoid areas of heavy development. Threats to subsistence activities and harvest patterns are a primary source of ongoing stress in North Slope communities. Avoidance of productive land could reduce harvests and worsen dietary and nutritional outcomes independent of any direct impact on the animals themselves. Kaktovik residents would be the most affected by potential oil and gas development, with lesser impacts possible for the communities of Nuiqsut, Venetie, and Arctic Village. Reductions in the success of subsistence harvests could accelerate the transition from subsistence resources to store-bought foods, worsening nutritional outcomes and food insecurity for some subsistence communities. Specifically, while offsets from oil and gas revenues may benefit Kaktovik by providing increased purchasing power for consumer foods, such offsets would not accrue to other communities like Arctic Village and other villages that are more reliant on caribou. ROP 36 would allow affected communities to participate in planning and decision-making to reduce impacts from development on subsistence activities.

Exposure to Potentially Hazardous Materials

Activities associated with future oil and gas exploration and development can affect human health via changes to air and water quality or an increase in noise pollution.

AIR QUALITY

Air quality impacts are similar for all action alternatives, with estimates of surface development ranging from 1,040 acres under Alternative D to 2,000 acres under Alternative B, although the point sources and their locations are unknown at this point. **Section 3.2.2**, Air Quality, describes the impacts of potential oil and gas development on air quality. The primary sources of airborne emissions are construction dust, road dust,

vehicle and machinery emissions, flaring and venting of gas, burning of refuse, and emissions from power generation and other sources, primarily during exploration, development, and production. The air pollutants emitted by these activities have been linked with a range of health effects, including asthma, chronic bronchitis, decreased pulmonary function, and cardiovascular events (BLM 2012).

Both the EPA and the State of Alaska have established legal limits for air pollution to protect public health (**Section 3.2.2**). Air quality changes are most likely to occur at and near the areas of oil and gas development. If the development areas are distant from Kaktovik, potential impacts on the health of Kaktovik residents as a whole are unlikely to be seen and overall impact on human health is likely to be low. Those most likely to be affected are those who stay in cabins or other residences near development areas. In particular, dust from construction or traffic could be an issue. Since limited information exists to estimate air quality impacts for all action alternatives, site-specific analysis would be performed at the time a project is proposed to determine actual impacts at sensitive receptor locations and to identify any measures necessary to reduce impacts on air quality and public health.

Based on previous development projects and studies on the North Slope, the overall potential impact on human health is likely to remain low as all action alternatives are likely to be below applicable air quality standards for all phases of development (**Section 3.2.2**); however, people who are particularly vulnerable to respiratory problems (such as children, the elderly, and people with certain chronic illnesses) could experience health problems at locations or during episodes with poorer air quality.

WATER QUALITY

As described in **Section 3.2.10**, future oil and gas development could affect water quality through accidental spills or releases or as the byproduct of construction, excavation, or human habitation. The risk of accidental spills or releases would be highest during exploration, development, and production. Water quality has the potential to affect the health of Kaktovik residents through contamination of drinking water or through contamination of rivers and waterways near subsistence cabins or camps.

Water could be contaminated through accidental discharges into watercourses that supply human water sources, particularly in areas of cabins or transient subsistence uses of the land; however, the likelihood of any such discharge occurring with the resultant human exposure is low, given the lease stipulations and BMPs around waste prevention, handling, disposal, spills, and public safety. If exposure occurred under these circumstances, the exposure would likely be short term and intermittent and would be unlikely to lead to significant health effects. No development is allowed on Barter Island, so no impacts on Kaktovik's drinking water supply are expected.

CONTAMINATION OF FOOD SOURCES

Section 3.4.3 states that there is a low likelihood of contamination of subsistence food sources, with the possible exception of contamination through an oil spill. This is supported by current low measurable impacts, despite high levels of oil and gas activities on the North Slope in the past. Although studies have found elevated levels of contaminants in several species, the levels found in subsistence foods in the North Slope area appear at present to be generally low and are lower than what would trigger public health concern (NSB 2006). Except in the event of a major spill (see **Section 3.2.11**), there are likely to be only negligible health effects from contamination of food sources as a result of any of the action alternatives.

Despite the current safety of traditional foods in the program area, Kaktovik residents remain concerned that oil and gas activities could potentially increase contaminant loads of subsistence foods to a level that would threaten human health. The perception of contamination may result in stress and anxiety about the safety of

subsistence foods and avoidance of subsistence food sources, with potential changes in nutrition-related diseases as a result. These health impacts (perceived or real) arise regardless of whether or not there is any contamination at levels of toxicological significance; the impacts are linked to the perception of contamination, not to measured levels. Monitoring contaminants in subsistence foods (ROP 7), including coordinating with Tribal Governments to incorporate Indigenous knowledge of contaminants to subsistence foods when available, would help address subsistence user concerns related to contaminants and identify potential human health issues.

NOISE

Noise levels could increase due to future construction or operation of oil and gas facilities, resulting in potential effects, ranging from minor irritation and annoyance to more severe health outcomes. Given the likely location of development away from Kaktovik, individuals at cabins or camps near developments would be most affected. Seismic exploration could occur across the entire program area, not just those areas available for lease. It could increase noise impacts on subsistence cabins or camps. ROP 37 would require operators to notify all potentially affected subsistence use cabin and campsite users before seismic activity begins. Noise impacts would be most likely to occur during development of potential projects, with lesser impacts expected during exploration, production, and abandonment and reclamation.

Noise from future air traffic and other sources could create a nuisance around camps and cabins, possibly reducing their use as a base for subsistence harvests. Development-related noise could cause irritation, annoyance, or sleep disturbance among individuals who experience it (BLM 2012).

Noise could also disrupt and displace caribou herds, resulting in changes to subsistence patterns, with impacts as described under *Accidents and Injuries* above. Residents on the North Slope have observed changes to caribou herd movements due to noise from helicopters, small aircraft, and seismic testing (SRB&A 2009a). Until site-specific development activities are proposed, the extent of this effect is not possible to determine. ROP 34 would minimize the effects of low-flying aircraft on subsistence activities and local communities, thereby reducing potential noise impacts from air traffic (Table 2-3).

Infectious Diseases

None of the action alternatives would result in a large increase of outside workers into Kaktovik, and only a small number of Kaktovik residents would be likely to work in the oil and gas fields, away from their family and community. Primarily, oil and gas works would be housed in on-site camps, with few interactions between oil and gas employees and Kaktovik residents outside of the camps. Increased rates of infectious diseases would be unlikely but could occur throughout all stages of oil and gas development. During the development and production phases there would be the highest number of employees expected in the program area (see Section 3.4.10).

Noncommunicable and Chronic Diseases

NSB and Kaktovik residents have age-adjusted mortality rates higher than the state rates for cancer, cardiovascular disease, and chronic respiratory diseases. These diseases have a variety of risk factors, only a few of which might be affected by oil and gas development in the program area: air quality, exposure to hazardous materials from spills, and chronic stress levels.

Kaktovik and NSB residents have high levels of respiratory disease, and commenters noted it as a concern during scoping (BLM 2018d). Emissions have been linked to respiratory diseases and cardiovascular diseases, especially particulate matter (EPA 2009); however, as discussed above and in Section 3.2.2, Air Quality, air emissions from all phases of oil and gas development would be unlikely to degrade air quality to levels

associated with effects on the health of Kaktovik residents. The development and production phases would have the highest levels of emissions.

ROP 6 would require emission inventories and baseline air monitoring before any specific project developed in the program area begins (**Table 2-3**). Those results would be analyzed at the project level after the lease sales are complete. Based on other oil and gas development on the North Slope, it is unlikely that air emissions during any stage of oil and gas development would reach levels that could increase respiratory or cardiovascular disease rates for Kaktovik residents.

Another possible pathway for increased disease susceptibility in Kaktovik residents is large oil spills. The risk of a large spill would be low, and required clean up measures would include worker health protection and exclusion zones to minimize potential exposure to hazardous materials for Kaktovik residents.

As described above and in **Section 3.4.3**, Subsistence Uses and Resources, potential changes in subsistence patterns are unlikely to result in substantial changes to diet and would not likely result in changes to obesity and rates of diabetes.

The NSB 2012 report notes that there are no known links between any stage of oil and gas development on the North Slope and chronic diseases. Impacts on rates of cancer, cardiovascular disease, and chronic respiratory disease would be unlikely.

Water and Sanitation

Oil and gas operators would provide on-site water and sanitation services for the worker camps. No changes in access to or cost of water and sanitation services in Kaktovik are anticipated during any phase of oil and gas development. Increases in NSB revenues could result in additional funding for water and sanitation facilities in Kaktovik; however, the current capacity of the water and sewer systems is adequate for projected population growth (NSB 2015a)

Health Services Infrastructure

Future oil and gas development would occur outside of Kaktovik and would be fully self-contained. Local Kaktovik health care services would not be affected by an influx of oil and gas workers because the worker camps would provide health services to them. There could be a slight increase in accidents due to changes in subsistence harvesting patterns, but these would be sporadic and well in the capacity of the Kaktovik local clinic and Samuel Simmonds Memorial Hospital in Utqiagvik.

Anticipated tax revenues from oil and gas development under all action alternatives would support the current level of health care services in Kaktovik, would allow for increased funding of existing health and social programs, and should not affect demand. Episodic increases in disease occurrence, such as respiratory disease resulting from poor air quality, have the potential to cause short-term strain on the health care system; however, no such occurrences are likely under any of the action alternatives.

Alternative B

Under Alternative B, the types of potential impacts on public health and safety would be the same as those described above (*Impacts Common to All Action Alternatives*). The duration of all types of impacts would be long term for the duration of operation in the program area.

Under Alternative B, 721,200 acres of Porcupine Caribou Herd calving habitat area would be available for leasing, which would result in the greatest potential impact on calf survival and overall Porcupine Caribou Herd numbers out of all alternatives. Caribou is a primary subsistence species for Kaktovik residents. Any

threat to herd numbers or contamination of meat would increase the likelihood and severity of health impacts resulting from changes in diet and nutrition and would worsen the current trends away from a traditional diet. These changes could extend outside the program area to other communities such as Arctic Village, Venetie, and other Alaskan and Canadian communities that harvest from the Porcupine Caribou Herd. In addition, changes to caribou herd numbers or movement could increase the distance and time that Kaktovik hunters travel and increase the potential for accidents or injury.

Potential impacts on subsistence resource availability would occur primarily for Kaktovik residents. Impacts from all stages of oil and gas development could extend outside the program area to other communities, such as Nuiqsut, Arctic Village, and Venetie, and to other Alaskan and Canadian communities that harvest the Porcupine Caribou Herd; however, substantial changes to Porcupine Caribou Herd caribou demographics are not expected and detrimental changes to diet and nutrition, as outlined in *Impacts Common to All Action Alternatives*, would not occur.

Alternative C

The types of potential impacts on public health and safety under Alternative C would be the same as those described under Alternative B; however, the intensity of subsistence impacts would be substantially less under Alternative C. Less than half of the calving grounds offered for sale under Alternative B would be offered for sale under Alternative C, and more lands would be subject to development and TLs. Alternative C would limit the density of development in areas closed to lease sales or with NSO restrictions, which would retain the ability of caribou to navigate through those areas, as well as implementing restrictions on development in caribou summer habitat. Protection of caribou calving areas would decrease the likelihood of diet changes and slow the trend from traditional foods to store-bought food.

Alternative D

The types of potential impacts on public health and safety under Alternative D would be the same as those described under Alternatives B and C. Levels of magnitude and duration, however, would be lower by comparison. Under Alternative D, total protection of caribou calving areas would ensure consistency in the availability of subsistence food sources. The total estimated surface disturbance under Alternative D would be 1,040 acres. Additionally, seismic exploration only would be allowed in areas available for lease sale. Overall, proposed actions in Alternative D would result in decreased effects on public health and safety compared to Alternatives B and C.

Alternative D2

Alternative D2 would result in the lowest impacts on health and safety, compared with all other action alternatives. Alternative D2 would have a smaller total area of disturbance than Alternative B because the area available for lease sale would be limited to 400,000 acres. Total surface disturbance would be estimated at 995 acres—the least of all the action alternatives (see **Table 2-1**, Quantitative Summary of Lease Stipulations by Action Alternative). In addition, Alternative D2 would have different lease stipulations and ROPs than Alternative B, which would further reduce effects on subsistence food resources such as caribou herds. For example, under Lease Stipulation 10, aircraft operations would be planned to minimize flights below 2,000 feet when flying within three miles of the Mollie Beattie Wilderness Area boundary. Overall, this would result in the most decreased effects on public health and safety compared to all other action alternatives.

Transboundary Impacts

Impacts on diet, nutrition, and subsistence activities may extend outside the US to the Inuvialuit, Gwich'in, and other user groups of Canada. Transboundary impacts would primarily occur in relation to subsistence

harvests of Porcupine Caribou Herd caribou, but Canadian users also harvest other migratory resources. As noted in **Section 3.4.3**, approximately 85 percent of the Porcupine Caribou Herd harvest occurs in Canada; the NWT Gwich'in, Vuntut Gwich'in, and Inuvialuit are the primary Canadian users in terms of number harvested (**Figure 3-7** in **Appendix A**).

While the likelihood of large-scale changes in caribou herds is low, Alternative B would allow for the greatest amount of development in the calving areas of the Porcupine Caribou Herd and it has the greatest potential to affect Porcupine Caribou Herd demographics. Alternative D would make available the fewest acres for leasing and would have the least potential to affect Porcupine Caribou Herd caribou demographics.

Impacts on Canadian communities would be similar to those in Arctic Village and Venetie with no expected changes to diet or nutrition from changes in Porcupine Caribou Herd caribou numbers. Concerns about possible contamination of caribou would continue for Canadian communities, with increased stress levels, as discussed under *Contamination of Food Sources*, above. ROP 7 would require operators to monitor subsistence species for signs of contamination and to mitigate any observed contamination.

Cumulative Impacts

As described in **Appendix G**, there are a significant number of activities planned or approved on the NSB and the program area. The village of Kaktovik and its residents have been buffered by the surrounding Arctic Refuge, which has limited oil and gas development in the immediate vicinity. Air and water quality in and around the village remains relatively untouched, subsistence harvests have not been noticeably affected, and the influx of oil and gas revenue for the NSB has improved infrastructure in the village.

Kaktovik residents indicated they no longer approach or cross the Canning River because of oil and gas activity to the west of it. Forecast projects would further increase development west of the program area (see **Appendix G**); these are the Alaska LNG project and Alaska Stand Alone Gas Pipeline, and oil and gas development in the Colville River region including the CD5, GMT2, Willow, and Nanushuk developments. There is still a high rate of accidents and injury, primarily because subsistence activities and food security for Kaktovik households remain a concern.

Future development offshore in the Beaufort Sea could affect Kaktovik residents by interfering with marine mammal movement patterns, such as the Beaufort Sea Outer Continental Oil and Gas Lease Sale and Liberty Project (see **Appendix G**). This could increase the risk of accident and injury by changing the subsistence harvest patterns and requiring more time on the water to harvest animals. In addition, the success rate for harvesting marine mammals could decline, reducing subsistence food for Kaktovik households and increasing food security concerns.

The action alternatives would have similar contributions to the cumulative effects on public health for Kaktovik residents with the pathways described above. All action alternatives would continue the ongoing transition from a subsistence-based diet to one that includes store-bought food. This is because oil and gas development could interfere with the success of subsistence activities, due to the area available for subsistence use shrinking overtime and long-term changes in subsistence use patterns. Alternatives C and D would lessen the potential adverse impacts of oil and gas development by protecting the Porcupine Caribou Herd calving range, including TLs in post-calving range and insect relief areas and larger buffers on important waterways and the coastal area. Alternative B would allow the most widespread industrial activity, with resulting potential impacts on subsistence harvest efforts, and could accelerate the transition away from a traditional diet and the subsequent increases in health risks.

As discussed in **Section 3.4.3**, cumulative impacts on subsistence could alter subsistence use areas and availability for Iñupiaq, Gwich'in, and Inuvialuit subsistence users, including alterations of migration patterns and changing weather patterns from climate change. Over time, reductions in subsistence harvests could have an adverse effect on diet and nutrition and could accelerate the transition from a subsistence-based diet to one that includes a higher proportion of store-bought food. The effects of climate change described under *Affected Environment*, above, could influence the rate or degree of the potential cumulative impacts. Current levels of contamination of traditional food and water supplies in the region are low and, in the absence of major spills or accidents, are unlikely to significantly change under any action alternative.

Rates of accident injury are very high for Kaktovik residents. Disruptions to subsistence harvest patterns and conflicts between uses of the land can lead to an increased risk of injury in hunters. This is in addition to the risk of unpredictable weather and sea ice conditions associated with climate change. All action alternatives would increase the likelihood of potential injury due to industrial use of land previously used only for subsistence activity.

Reasonably foreseeable future actions also include community development in Arctic communities involving both large and small infrastructure projects. Increasing economic development and revenues to the local governments under all the action alternatives would also support maintenance and improvement of Kaktovik infrastructure and systems. The direct and indirect employment resulting from oil and gas exploration and development, combined with the government and ANCSA corporation revenues, are all major contributors to the positive health changes in the NSB over the last few decades. The activities under all action alternatives would contribute substantially to these ongoing impacts, with greater levels of employment generally more likely to be associated with good health.

Due to the lack of oil and gas development in the Coastal Plain, current levels of contamination of traditional food and water supplies in the region are low. Each alternative's Lease Stipulations and ROPs have varying levels of protections for land, water, and wildlife in order to minimize the potential for contamination. As a result, while there are varying degrees of potential for accidental oil spills across the alternatives, the potential for significant adverse effects on public health is limited. Alternative D has the most protective Lease Stipulations and ROPs, and therefore, is anticipated to have minimal cumulative effects to the environment and public health.

3.5 UNAVOIDABLE ADVERSE EFFECTS

Unavoidable adverse effects would be expected to occur during oil and gas exploration, development, and production under the alternatives considered in this SEIS. Many adverse impacts could be lessened by Lease Stipulations and ROPs but would not be completely eliminated or reduced to negligible levels. Some are short-term impacts, while others may be long-term impacts. In the event of a large oil spill, many of the adverse effects discussed would occur. These have been described for each resource in **Sections 3.1 to 3.4**.

Depending on the location and extent of oil and gas operations and adopted mitigation, unavoidable adverse effects could include the following:¹⁹

- Loss of soil productivity and sand and gravel resources, largely from construction of roads and pads and gravel mine development

¹⁹Note that this list presents only a summary of possible unavoidable adverse effects. Refer to Section 4.9 of the 2012 Final IAP/EIS (BLM 2012) for a more complete discussion of similar unavoidable adverse effects that could occur post-leasing.

- Changes in surface flow and drainage patterns due to construction of roads and pads and surface water withdrawal for ice roads, dust abatement, and operations
- Loss of vegetation habitat, including wetlands, due to construction of roads and pads and gravel mine development
- Loss, alteration, or fragmentation of wildlife habitat
- Changes in wildlife migration or travel patterns
- Continued change in access to and availability of subsistence resources

Before surface-disturbing activities begin, oil and gas leasing regulations (43 CFR 3104) require the operator on the ground to be covered by a bond. This bond provides monetary assurance to the BLM that the company would reclaim the pads, wells, and any associated surface disturbance to the standards of the BLM Authorized Officer. This is determined at the time of reclamation, thus allowing the BLM and USFWS to take an adaptive management approach. On abandonment, the BLM would consider current data, technologies available, and the current resource situation in its determinations on specific reclamation. Additionally, the BLM retains the ability to increase the bond amount at any time during the lease, based on a recalculation of liability, such as an increased number of wells or a history of noncompliance with its operational standards. It is the intent of the BLM to apply the bonding requirements listed at 43 CFR 3134 to the Coastal Plain.

3.6 RELATIONSHIP BETWEEN LOCAL SHORT-TERM USES AND LONG-TERM PRODUCTIVITY

This section discusses the short-term effects of the leasing alternatives, including the potential use of the program area for oil and gas exploration and development, versus the maintenance and enhancement of potential long-term productivity of the program area's environmental resources.

Short term in this discussion refers to the total duration of activities that could occur as a result of the leasing alternatives, primarily oil and gas exploration and production, whereas long term refers to an indefinite period extending beyond the termination of the action. Specific impacts vary in kind, intensity, and duration according to the activities occurring at any given time. Activities during the production life of oil and gas leases executed based on the decision in the ROD for this SEIS may result in chronic impacts over a longer period. Over the long term—several decades after completion of abandonment activities—natural environmental balances are generally expected to be restored, though that balance would not for all resources mean a return to the exact state prior to original disturbance.

For a discussion of short-term uses of the program area for hydrocarbon development and production activities versus the maintenance and enhancement of potential long-term productivity of environmental resources of the program area, see **Sections 3.1 to 3.4** of this document; see Section 4.10 of the NPR-A EIS (BLM 2012) for a description of the indirect impacts that would occur post-leasing.

3.7 IRREVERSIBLE AND IRRETRIEVABLE COMMITMENTS OF RESOURCES

Irreversible or irretrievable commitments of resources refer to impacts on or losses of resources that cannot be reversed or recovered. For a detailed description of irreversible or irretrievable commitments of resources from oil and gas development that could occur post-leasing, see Section 4.11 of the NPR-A EIS (BLM 2012). There would be some irreversible or irretrievable commitments of resources that are described in greater detail in **Sections 3.1 to 3.4**, as follows:

- Removal of hydrocarbons from the reservoir
- Energy consumption associated with the exploration, construction, and operation phases

3. Affected Environment and Environmental Consequences (Irreversible and Irretrievable Commitments of Resources)

- Permanent ground disturbance and permanent change resulting from gravel removal, including creation of permanent water bodies where gravel mines are located
- Surface water consumption for drilling and other industrial purposes with wastewater disposal via underground injection
- Soils adjacent to disturbed areas could be affected by thermokarst and would be permanently removed from future productivity
- Burial of vegetation under gravel fill could take 25-30 years or more to reestablish following reclamation
- Loss of visual resource quality in the Coastal Plain
- Loss or abandonment of wildlife habitat
- Loss or change in subsistence use of the program area, depending on final abandonment plans
- Loss of access to traditional use areas could result in a loss of continuity between generations and changes in sharing and reciprocity
- Loss of cultural and paleontological resources

Chapter 4. Collaboration and Coordination

4.1 INTRODUCTION

This chapter summarizes the public and agency outreach that the BLM has engaged in as it has developed the Leasing SEIS, as required under NEPA. This outreach included keeping the public and agencies informed of the process. It also offered several opportunities for the public and agencies to express their concerns, share their knowledge, and suggest how the BLM should proceed. This chapter also identifies the individuals who prepared the Leasing SEIS.

4.2 SCOPING

Formal scoping for the Leasing SEIS began on August 4, 2021, with the publication in the *Federal Register* of a Notice of Intent (NOI) to prepare the SEIS for the Coastal Plain oil and gas leasing program. The NOI notified the public of the beginning of the scoping process, which included a description of the 60-day public scoping period to solicit public comment and to identify issues (<https://eplanning.blm.gov/eplanning-ui/project/2015144/570>). The scoping comment period ended on October 4, 2021. In addition, the NOI described the NEPA process, the need for preparing a SEIS, and preliminary issues for analysis in the SEIS. The NOI also provided information on the means to submit scoping comments.

The BLM conducted several virtual public scoping meetings to notify the public of the Leasing SEIS (**Table 4-1**). The USFWS was not yet confirmed as a joint lead agency during the SEIS public scoping period. Each scoping meeting included a presentation by the BLM that described the background and purposes of the SEIS, the project schedule, and further public involvement opportunities. Additionally, the BLM maintains a project website with information related to the development of the Leasing SEIS: <https://eplanning.blm.gov/eplanning-ui/project/2015144/510>. The website includes background documents, maps, information on public meetings, and contact information.

Table 4-1
Leasing SEIS Scoping Meetings

Date	Time (Alaska Standard)	Venue
September 14, 2021	1:00 p.m.	Zoom virtual meeting
September 14, 2021	6:00 p.m.	Zoom virtual meeting
September 15, 2021	10:00 a.m.	Zoom virtual meeting
September 15, 2021	6:00 p.m.	Zoom virtual meeting
September 16, 2021	1:00 p.m.	Zoom virtual meeting
September 16, 2021	6:00 p.m.	Zoom virtual meeting

The BLM received 210 unique written submissions during the public scoping period; the number of substantive comments extracted from these submissions varied between all letters. Overall, 1,555 substantive scoping comments were identified using the comment analysis response application, an ePlanning software of the BLM. The final Leasing SEIS Scoping Report is available on the project website (<https://eplanning.blm.gov/eplanning-ui/project/2015144/510>).

4.3 PUBLIC REVIEW AND COMMENT ON THE DRAFT SEIS

The NOA of the Draft SEIS was published in the Federal Register on September 8, 2023, initiating a 45-day public comment period. The public meeting schedule was published on the project website as the meeting dates and locations were finalized (<https://eplanning.blm.gov/eplanning-ui/project/2015144/510>). Public notices for the meetings were placed in newspapers with circulations in or near the locations where the public meetings were held. These newspapers included the Anchorage Daily News, Fairbanks Daily News Miner, and Arctic Sounder. The joint lead agencies also distributed public notices via press releases, emails, and flyers. Additionally, meeting information was distributed via social media, including the BLM and USFWS Facebook pages, as well as circulated through community-specific Facebook groups. The public meetings held during the comment period are detailed below (Table 4-2).

Table 4-2
Leasing Draft SEIS Public Meetings

Date	Time (Alaska Standard)	Location
September 22, 2023	9:00a.m.	Virtual Public Meeting
September 25, 2023	5:00 p.m.	Utquiagvik
September 26, 2023	5:00 p.m.	Venetie
September 28, 2023	5:00 p.m.	Arctic Village
October 6, 2023	9:00 a.m.	Virtual Public Meeting
October 9, 2023	12:00 p.m.	Fort Yukon
October 11, 2023	5:00 p.m.	Virtual Public Meeting
October 16, 2023	5:00 p.m.	Anchorage
October 17, 2023	1:00 p.m.	Virtual Public Meeting
October 23, 2023	5:00 p.m.	Fairbanks

Information was also posted on the project website, where the public was able to download a copy of the Leasing Draft SEIS and provide their comments on the document. In response to public comments received, the comment period was extended an additional 15 days to November 7, 2023, for a total of 60 days. The joint lead agencies received written comments by mail, email, online comment form via ePlanning, and verbal testimony at public meetings. Comments covered a wide range of thoughts, opinions, ideas, and concerns. A total of 112,963 comment letter submissions were received; 792 of which were considered unique submissions and 112,171 were part of form letter campaigns.

4.4 TRIBAL CONSULTATION

To initiate the government-to-government consultation process, as required by the presidential executive memorandum dated April 29, 1994, the BLM and USFWS initiated the government-to-government Tribal consultation process with letters sent on August 18, 2021, to the following Tribal governments whose members could be affected by oil and gas leasing actions within the Coastal Plain.

Tribal Governments Contacted for Government-to-Government Consultation
Arctic Village Council
Iñupiat Community of the Arctic Slope
Native Village of Kaktovik
Venetie Village Council
Native Village of Venetie Tribal Government

Tribal Governments Contacted for Government-to-Government Consultation
Beaver Village Council
Birch Creek Tribal Council
Chalkyitsik Village Council
Gwitchyaa Zhee Gwich'in Tribal Government (Fort Yukon)
Naqragmiut Tribal Council (Anaktuvuk Pass)
Native Village of Barrow Iñupiat Traditional Government
Native Village of Nuiqsut
Native Village of Stevens
Circle Village Council
Native Village of Eagle

To date, the joint lead agencies have held government-to-government consultation meetings with the following Tribal governments.

Table 4-3
Leasing SEIS Government-to-Government Consultation Meetings

Date	Location	Tribal Government
June 27-28, 2022	Arctic Village	Arctic Village Council, Venetie Village Council, and Native Village of Venetie Tribal Government
September 13-14, 2022	Arctic Village	Arctic Village Council, Venetie Village Council, and Native Village of Venetie Tribal Government
October 18, 2022	Anchorage	Arctic Village Council, Venetie Village Council, and Native Village of Venetie Tribal Government
October 26-27, 2022	Kaktovik	Native Village of Kaktovik
February 13, 2023	Kaktovik	Native Village of Kaktovik
May 9, 2023	Virtual (Teams)	Native Village of Kaktovik, Iñupiat Community of the Arctic Slope
September 27, 2023	Venetie	Native Village of Venetie Tribal Government, Venetie Village Council
September 29, 2023	Arctic Village	Arctic Village Council, Native Village of Venetie Tribal Government
December 15, 2023	Utqiagvik	Iñupiat Community of the Arctic Slope
December 19, 2023	Kaktovik	Native Village of Kaktovik

4.5 ANCSA CORPORATION CONSULTATION

The joint lead agencies also contacted ANCSA corporations to offer the opportunity to participate in consultation on the Leasing SEIS process. To date, the joint lead agencies have held consultation meetings with the Kaktovik Iñupiat Corporation. Meeting dates and locations are listed below. The joint lead agencies will continue to consult with ANCSA corporations throughout the planning process.

Table 4-4
Leasing SEIS ANCSA Corporation Consultation Meetings

Date	Location	Corporation
October 26-27, 2022	Kaktovik	Kaktovik Iñupiat Corporation
February 13, 2023	Kaktovik	Kaktovik Iñupiat Corporation

Date	Location	Corporation
December 19, 2023	Kaktovik	Kaktovik Iñupiat Corporation
November 21, 2023	Anchorage	Arctic Slope Regional Corporation

4.6 COORDINATION AND CONSULTATION WITH LOCAL, STATE, AND FEDERAL AGENCIES

The joint lead agencies have contacted governmental agencies in multiple ways, most notably through inviting or accepting requests for such agencies to participate as cooperating agencies, as defined in 43 CFR 1508.5. Agencies who are participating in the Leasing SEIS effort as a cooperating agency include:

Participating Cooperating Agencies
Environmental Protection Agency
State of Alaska
Native Village of Kaktovik
Iñupiat Community of the Arctic Slope
Native Village of Venetie Tribal Government
Venetie Village Council
Arctic Village Council

The BLM is consulting with the Alaska State Historic Preservation Office (SHPO), in accordance with Section 106 of the NHPA. This is because the BLM has a responsibility to consider the effects of the proposed leasing program on historic properties, which are properties listed on or eligible for listing on the National Register of Historic Places (NRHP). Formal consultations with the SHPO may also be required during implementation of individual projects.

Consultation was previously completed for this project with both the USFWS and the National Marine Fisheries Service (NMFS) under Section 7 of the ESA. Consultation with the USFWS and NMFS was reinitiated as part of developing this SEIS to address changes to the range of alternatives and mitigation measures. Biological opinions will be issued by USFWS and NMFS prior to the issuance of the ROD.

4.7 ANILCA SECTION 810 EVALUATION

Section 810 of ANILCA focuses on issues related to the effects of proposed activities on subsistence use. An ANILCA Section 810 notice and public hearing is required if a proposed action may significantly restrict subsistence uses and needs. A preliminary evaluation and finding of effects on subsistence uses and needs from actions that could be undertaken under the four alternatives considered in this Leasing SEIS is provided in **Appendix F**. The BLM has found that the cumulative case presented in this SEIS may significantly restrict subsistence uses. The joint lead agencies held ANILCA Section 810 hearings in the following communities:

Table 4-5
ANILCA Section 810 Hearings

Date	Location
September 25, 2023	Utqiagvik
September 26, 2023	Venetie
September 28, 2023	Arctic Village
October 9, 2023	Fort Yukon
March 21, 2024	Kaktovik

4.8 COORDINATION WITH CANADIAN GOVERNMENT

The DOI has coordinated and exchanged information with representatives of the Canadian government for the development of the Leasing SEIS.

4.9 LIST OF PREPARERS

This Leasing SEIS was prepared by an interdisciplinary team of staff from the BLM, USFWS, and Environmental Management and Planning Solutions Inc., with their supporting subcontractors ABR Inc., DOWL, Northern Economics Inc., Ramboll, Stephen R. Braund & Associates, and Uqaqti Consulting. **Table 4-6** Lists the people that prepared or contributed to the development of the Leasing SEIS.

Table 4-6
Leasing SEIS Preparers

Preparer	Name	Role
BLM Interdisciplinary Team	Serena Sweet	Joint Lead Agency Project Manager
	Stephanie Kuhns	Joint Lead Agency Project Manager
	Stewart Allen	Economy
	Melinda Bolton	Public Affairs/Public Outreach
	Emma Roach	Public Affairs/Public Outreach
	Willie Branson	Wildland Fire
	Brent Breithaupt	Paleontological Resources
	Rob Brumbaugh	Petroleum Resources
	Stephen Daw	GIS
	Melody Debenham	Solid and Hazardous Waste
	Katie Drew	Water Resources; Fish and Aquatic Species
	Ann Erickson	Vegetation and Wetlands
	Matthew Ferderbar	Soils and Permafrost
	Joe Galluzzi	Sand and Gravel Resources
	Cindy Hamfler	GIS
	Joe Keeney	Cultural Resources
	Bob King	Cultural Resources
	Zach Lyons	Geology and Minerals; Physiography
	VJ Maisonet-Montanez	Air Quality; Climate and Meteorology; Acoustic Environment
	Chris McKee	Section 810 Hearings; Subsistence Uses and Resources
	Elizabeth Mikow	Cultural Resources; Public Health and Safety; Sociocultural Systems, Environmental Justice
	Zach Million	Recreation; Special Designations; Visual Resources; Transportation
	Debbie Nigro	Birds; Special Status Species
Craig Perham	Special Status Species	
Heather Savage	Terrestrial Mammals	
Mary Szatkowski	Water Resources	
Matt Varner	Fish and Aquatic Species	
Donna Wixon	Landownership and Uses	

4. Consultation and Coordination (List of Preparers)

Preparer	Name	Role
USFWS Interdisciplinary Team	Bobbie Jo Skibo	Joint Lead Agency Project Manager
	Tim Allen	Air Quality, Climate, and Meteorology
	Diana Biesanz	Landownership and Uses
	Randy Brown	Fish and Aquatic Species
	Peter Butteri	Wildland Fire
	Erin Carver	Economy; Sociocultural Systems; Environmental Justice
	Gilbert Castellanos	International Affairs (Canda/Caribou)
	Catherine Collins	Air Quality, Climate, and Meteorology
	Sheila Dufford	GIS
	Hunter Gravley	Vegetation and Wetlands
	Charlie Hamilton	International Coordination
	Jeremy Karchut	Cultural Resources
	Roger Kaye	Special Designations
	Tim Knudson	Acoustic Environment
	Chris Latty	Birds
	Bill Leacock	Terrestrial Mammals
	Paul Leonard	Air Quality; Climate and Meteorology; Soils and Permafrost; Water Resources; Visual Resources
	Angela Matz	Solid and Hazardous Waste; Public Health and Safety
	Andrea Medeiros	Public Affairs/Public Outreach
	Kaiti Ott	Special Status Species
	Jennifer Reed	Recreation; Special Designations
	John Trawicki	Water Resources
	Ella Wagener	Cumulative Impacts
	Ryan Wilson	Special Status Species
	AECOM	Amy Lewis
Erin Hudson		Assistant Project Manager; Recreation
Marcia Rickey		GIS
Rob Lavie		GIS
Taylor Bartlett		Visual Resources
Lily Benson		Acoustic Environment
Amy Cordle		Acoustic Environment
Sean Cottle		Comment Analysis Lead
Megan Stone		Decision File/Administrative Record Lead
Francis Craig		Petroleum Resources; Sand and Gravel Resources
Noelle Crowley		Landownership and Use
Kevin Doyle		Paleontological Resources
Derek Holmgren		Special Designations; Visual Resources
David Jaeger		Recreation
Bronson Pace		Special Designations
Shine Roshan		Petroleum Resources; Sand and Gravel Resources
Josh Schnabel		Public Health and Safety
Val Stanson		Transportation
Andrew Wilkins		Paleontological Resources

4. Consultation and Coordination (List of Preparers)

Preparer	Name	Role
ABR Inc.	Wendy Davis	Vegetation and Wetlands
	Adrian Gall	Special Status Species (including Marine Mammals)
	Alexander Prichard	Terrestrial Mammals
	Terry Schick	Birds
	John Seigle	Fish and Aquatic Species
DOWL	Matt Blakeslee	Geology and Minerals; Physiography; Soils and Permafrost
	Dana Brunswick	Water Resources
	Adam Morrill	Solid and Hazardous Waste
	Kerri Nutter	Geology and Minerals; Physiography; Soils and Permafrost
	Rich Pribyl	Water Resources
Northern Economics Inc	Leah Cuyno, PhD	Economy
	Melissa Errend	Environmental Justice
	Don Schug	Environmental Justice
Ramboll	Ross Beardsley	Air Quality; Climate and Meteorology
	John Grant	Air Quality; Climate and Meteorology
	Krish Vijayaraghavan	Air Quality; Climate and Meteorology
Stephen R. Braund & Associates	Stephen Braund	Cultural Resources; Subsistence Uses and Resources; Sociocultural Systems; Section 810 analysis
	Paul Lawrence	Cultural Resources; Subsistence Uses and Resources; Sociocultural Systems; Section 810 analysis
	Liz Sears	Subsistence Uses and Resources; Sociocultural Systems; Section 810 Analysis
	Randy Tedor	Cultural Resources
Uqaqti Consulting	Joy Huntington	Public Involvement

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Glossary

50-, 100-, 200-year flood for CP rivers: A flood recurrence interval is the average number of years between floods of a certain magnitude. Statistical analysis of historic stage and discharge data is used to determine the likelihood of floods of various magnitudes. A 50-year flood is the flood magnitude that has a 1/50, or 2%, chance of occurring in a given year. Similarly, a 100-year flood has a 1/100 (1%) and a 200-year flood has 1/200 (0.5%) chance of occurring in a given year.

Acidophilus: Acid-loving (as in bacteria or plants); growing well in an acid medium.

Active floodplain: The flat area along a water body where sediments are deposited by seasonal or annual flooding; generally demarcated by a visible high-water mark.

Active sites: Are known contaminated sites which may pose a potential risk to human health and the environment, and cleanup has not been completed.

Aerial: Consisting of, moving through, found in, or suspended in the air.

Alaska Department of Environmental Conservation (ADEC) documented contaminated site: A contaminated site or groundwater plume with an “Active” or “Cleanup Complete-Institutional Controls” status identified by the ADEC spill prevention and response program:

Active: Sites in this category generally have remediation efforts complete and any remaining contamination is below levels that pose a threat to human health or the environment.

Cleanup complete: Sites in this category generally have remediation efforts complete and any remaining contamination is below levels that pose a threat to human health or the environment.

Cleanup complete-institutional controls: Sites in this category generally have no further remediation planned but the potential for future exposure to residual contamination warrants institutional controls to inform people of contamination and limit activities that could result in exposure to, or the spread of, the contamination.

Alluvial: Sedimentary material consisting mainly of coarse sand and gravel.

Alternatives: The different means by which objectives or goals can be attained. One of several policies, plans, or projects proposed for decision-making.

Ambient: Used to describe the environment as it exists at the point of measurement and against which changes (impacts) are measured.

Ambient air quality standard: Air pollutant concentrations of the surrounding outside environment that cannot legally be exceeded during fixed time intervals and in a specific geographic area.

Amphidromous: Describes fish that spawn and overwinter in rivers and streams but migrate during the ice-free summer from these freshwater environments into coastal waters for months to feed.

Anadromous fish: A fish or fish species that spends a portion of its lifecycle in both freshwater and marine habitats, where they spawn in and undergo early development in freshwater, enter marine habitats to grow and mature, and return to freshwater to reproduce. Anadromous fish include both semelparous forms, which die after spawning, and iteroparous forms which spawn multiple times.

Anchor field: An oil and gas field containing sufficient quantities of recoverable oil and gas to support the construction of infrastructure and processing facilities; satellite fields can then be constructed using the anchor field facilities.

Anoxic: The condition of an environment in which free oxygen is lacking or absent.

Anthropogenic: Of, relating to, or resulting from the influence of humans on nature.

Anticline: An inverted bowl-shaped structure formed when sedimentary rock layers are folded to produce an arch or elongated dome.

Aquatic: Growing, living in, frequenting, or taking place in water; in this Leasing EIS, used to indicate habitat, vegetation, and wildlife in freshwater.

Archaeological resource: Any material remains of human life or activities that are at least 50 years of age and that are of archaeological interest (30 CFR 550.105).

Aufeis: Overflow icing; a layer of ice that builds up due to ground water flows during freezing temperatures

Authorized Officer (BLM): Designated BLM personnel responsible for a certain area of a project; for the Leasing EIS, generally this would be the BLM State Director.

Available: When referring to oil and gas leasing, available lands could be offered. Lands that are already leased could be offered for leasing if the existing lease ends.

Bank: (1) The rising ground bordering a lake, river, or sea; or of a river or channel, for which it is designated as right or left as the observer is facing downstream. (2) An elevation of the sea floor or large area, located on a continental (or island) shelf and over which the depth is relatively shallow but sufficient for safe surface navigation (e.g., Georges Bank); a group of shoals. (3) In its secondary sense, used only with a qualifying word such as “sandbank,” “gravel bank,” or “spoil bank,” a shallow area consisting of shifting forms of silt, sand, mud, and gravel.

Barrel: Unit of measurement consisting of 42 gallons of oil or other fluid.

Baseline data: Data gathered before a proposed action to characterize pre-development site conditions.

Bedrock outcrops: Exposed sections of solid rock at the Earth's surface.

Biodegradable: Capable of being broken down by the action of living organisms, such as microorganisms.

Biodiversity: The variety and variability among living organisms and the ecological complexes in which they occur.

Biological assessment (BA): A document prepared by or under the direction of a federal agency; addresses listed and proposed species and designated and proposed critical habitat that may be in the action area and evaluates the potential effects of the action on such species and habitat.

Black water: Discharge that includes wastewater from any or all of the following: toilets, urinals, and sewage treatment systems.

Bonding capacity: An amount, determined by market analysts, based on a government entity's prior bonding experience, actual repayment performance, and its ability to service future, periodic debt. It affects the ability of municipalities to issue and sell bonds to generate funds for capital improvements.

Bottom-fast ice: Ice that is firmly attached or grounded to the bottom of a waterbody, which is often frozen from top to bottom.

Brackish: Water that is intermediate between salt water and freshwater; often occurs at the mouths of rivers, where freshwater mixes with salt water.

Brine: General description of water that is produced with oil. The water is associated with the oil-producing formation and can have varying amounts of dissolved salts.

Brood: A group of young birds being cared for by an adult bird; typically the surviving hatchlings from one or more clutches of eggs.

Buffer area: A spatial zone created to enhance the protection of a specific conservation area, often peripheral to the area.

Bureau of Land Management (BLM): An agency of the United States government, under the US Department of the Interior, responsible for administering certain public lands of the United States.

Burin: A tool flaked into a chisel point for inscribing or grooving bone, wood, leather, stone, or antler.

Calving area: A large area where large mammals, particularly ungulates such as caribou, congregate to give birth to their young.

Capital expenses: The money spent to purchase or upgrade physical assets, such as buildings or machinery.

Caribou Study Community: Any community that is in game management subunits that overlap with the Porcupine Caribou Herd or Central Arctic Herd ranges, and which have Federal Subsistence Board customary and traditional use determinations for those herds.

Carrion: Dead or dying animal flesh.

Class I air quality area: One of 156 protected areas, such as national parks over 6,000 acres, wilderness areas over 5,000 acres, national memorial parks over 5,000 acres, and international parks that were in

existence as of August 1977, where air quality should be given special protection. Federal Class I areas are subject to maximum limits on air quality degradation called air quality increments (often referred to as prevention of significant deterioration [PSD] increments). All areas of the United States not designated as Class I are Class II areas. The air quality standards in Class I areas are more stringent than national ambient air quality standards.

Cleanup complete: Sites are contaminated sites determined by ADEC to be suitable for residential land use and are not considered to pose a threat to human health or the environment.

Cleanup Complete with Institutional Controls (IC) sites: Contaminated sites where cleanup (as determined by ADEC) has been completed to the extent practicable, but contamination remains above the established cleanup levels. Sites identified as IC usually require coordination with ADEC if construction is on or immediately adjacent to the contaminated site, as the IC may pose a risk to human health or the environment.

Climate change: Climate is described by the National Weather Service (NWS) as the most recent 30-year averages of meteorological parameters, such as temperature, precipitation, humidity, and winds; thus, climate change is defined here as the longer-term (longer than 30 years) changes in such variables at regional or global scales.

Coastline: The area where the contiguous land (excluding nearshore marine waters, lagoons, and barrier island habitats) meets the ocean.

Council on Environmental Quality (CEQ): An advisory council to the president, established by the National Environmental Policy Act of 1969. It reviews federal programs for their effect on the environment, conducts environmental studies, and advises the president on environmental matters.

Comprehensive Environmental Response Compensation and Liability Act of 1980 (CERCLA): Authorizes funds administered by the Environmental Protection Agency to identify and clean up hazardous waste sites; also known as Superfund.

Code of Federal Regulations (CFR): A codification of the general and permanent rules published in the *Federal Register* by the executive departments and agencies of the federal government.

Cfs: Cubic feet per second; 1 cfs equals 448.33 gallons per minute.

Commercial field: Oil or natural gas fields that can be produced such that they provide a suitable return on investment.

Commercial oil or natural gas reserves: Resources that can be produced such that they provide a suitable return on investment.

Commercially recoverable: See *Commercial oil or natural gas reserves*, above.

Concern: A point, matter, or question raised by management or the public that must be addressed in the planning process.

Conglomerate: Sedimentary rock consisting of gravel and small boulders.

Consistency determination: A finding by a state or federal agency that a project or agency action is consistent with a required agency program, guideline, or regulation, such as the Alaska Coastal Zone Management Program.

Consultation: Exchange of information and interactive discussion; when capitalized it refers to consultation mandated by statute or regulation that has prescribed parties, procedures, and timelines, such as Consultation under NEPA or Section 7 of the Endangered Species Act.

Contaminated site: A location where hazardous substances, including petroleum products, have been improperly disposed. Contaminated sites often threaten public health or the environment and can cause economic hardship to people and communities.

Controlled surface use (CSU): A category of moderate constraint stipulations that allows some use and occupancy of public land, while protecting identified resources or values and is applicable to fluid mineral leasing and all activities associated with fluid mineral leasing, such as truck-mounted drilling and geophysical exploration equipment off designated routes and construction of wells and pads. CSU areas are open to fluid mineral leasing, but the stipulation allows the BLM to require special operational constraints, or the activity can be shifted more than 656 feet to protect the specified resource or value.

Criteria: Data and information that are used to examine or establish the relative degrees of desirability of alternatives or the degree to which a course of action meets an intended objective.

Criteria air pollutants: The six most common air pollutants in the US: carbon monoxide (CO), lead (Pb), nitrogen dioxide (NO₂), ozone (O₃), particulate matter (both PM₁₀ and PM_{2.5} inhalable and respirable particulates), and sulfur dioxide (SO₂). Congress has focused regulatory attention on these six pollutants because they endanger public health and the environment, are widespread throughout the US, and come from a variety of sources. Criteria air pollutants are typically emitted from many sources in industry, mining, transportation, electricity generation, energy production, and agriculture.

Crude oil: Oil separated from the brine, natural gas, formation sand, and other impurities and would be transported in the proposed pipeline.

Cultural resources: Culturally valued aspects of the environment s, other culturally valued pieces of real property, cultural use of the biophysical environment, and intangible sociocultural attributes such as social cohesion, social institutions, lifeways, religious practices, and other cultural institutions.

Cumulative effect or impact: The impact on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (federal or non-federal) or person undertakes such actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over time.

Deferred: When referring to oil and gas leasing, indicates that lands would not be offered for lease until a specified period has expired. For example, a 10-year deferral would mean that the deferred lands would not be offered for leasing until for 10 years after the Record of Decision establishes the 10-year deferral.

Demersal: Living near, deposited on, or sinking to the seabed.

Density: The number of individuals per a given unit area.

Deposit: A natural accumulation, as of precious metals, minerals, coal, gas, and oil, that may be pursued for its intrinsic value, such as a gold deposit.

Development: The phase of petroleum operations that occurs after exploration has proven successful and before full-scale production. The newly discovered oil or gas field is assessed during an appraisal phase, a plan to fully and efficiently exploit it is created, and additional wells are usually drilled.

DEW-Line: Distant Early Warning Line. A site designed and built during the Cold War as the primary line of air defense warning of an “over the pole” invasion of North America.

Dilution: Mixing or thinning and therefore decreasing a certain strength or concentration.

Dispersion: Distributing or separating into lower concentrations or less dense units.

Disruption: Something which interrupts or changes pre-existing conditions.

Disrupt flow from perennial springs: As in Lease Stipulation 3, permitted activities must not interrupt or alter the natural flow to or from perennial springs. Perennial springs in the Arctic Coastal Plain are described in section 3.2.10 Water Resources.

Dissociable: Able to break up into simpler chemical constituents.

Dissolved oxygen: The amount of free oxygen dissolved in water.

Diversity: An expression of community structure; high, if there are many equally abundant species; low, if there are only a few equally abundant species; the distribution and abundance of different plant and animal communities and species in the area covered by a land and resource management plan.

Draft Environmental Impact Statement (DEIS): The draft statement of the environmental effects of a major federal action, which is required under section 102 of the National Environmental Policy Act and released to the public and other agencies for comment and review.

Drill pad: A drilling site, usually constructed of local materials such as gravel.

Drilling fluid (mud): A preparation of water, clay, and chemicals circulated in a well during drilling to lubricate and cool the drill bit, flush rock cuttings to the surface, prevent sloughing of the sides of the hole, and prevent the flow of formation fluids into the bore-hole or to the surface.

Duck pond: A small, flat-bottomed plastic receptacle placed under a vehicle to catch and contain any contaminated fluids that may melt or drip from the underside of the vehicle.

Ecological integrity: The capability of supporting and mainlining a balanced, integrated, adaptive community of organisms having a species composition and functional organization comparable to that of natural habitat of the region.

Economically recoverable: See *Commercial oil or gas reserves*, above.

Economically recoverable volume: The amount of a resource in place that is estimated to be profitably produced using existing technology, at defined current or expected future resource prices.

Effect: Environmental change resulting from a proposed action. Direct effects are caused by the action and occur at the same time and place, while indirect effects are caused by the action but are later in time or farther removed in distance, although still reasonably foreseeable. Indirect effects may include growth-inducing and other effects related to induced changes in the pattern of land use, population density, or growth rate and related effects on air and water and other natural systems, including ecosystems. Effect and impact are synonymous, and both are used in this document.

Employment: Labor input into a production process, measured in the number of person-years or jobs; the number of jobs required to produce the output of each sector. A person-year is approximately 2,000 working hours by one person working the whole year or by several persons working seasonally. A job may be 1 week, 1 month, or 1 year.

Endangered species: Any species of animal or plant that is in danger of extinction throughout all or a significant portion of its range; plant or animal species identified by the Secretary of the Interior as endangered in accordance with the 1973 Endangered Species Act.

Energy budget: The flow of energy through an organism or ecosystem. For an organism, it is the amount of energy being absorbed (e.g., food) in relation to the amount of energy expended and lost as heat.

Environment: The physical conditions that exist in an area, such as the area that would be affected by a proposed project, including land, air, water, minerals, flora, fauna, ambient noise, and objects of historic or aesthetic significance; the sum of all external conditions that affect an organism or community to influence its development or existence.

Environmental assessment (EA): A concise public document, for which a federal agency is responsible, that serves to (1) briefly provide sufficient evidence and analysis for determining whether to prepare an environmental impact statement or a finding of no significant impact; (2) aid an agency's compliance with the National Environmental Policy Act when no environmental impact statement is necessary; and, (3) facilitate preparation of an environmental impact statement when one is necessary. .

Environmental impact statement (EIS): An analytical document prepared under the National Environmental Policy Act that portrays the potential impacts of the environment of a preferred action and its possible alternatives. An EIS is developed for use by decision-makers to weigh the environmental consequences of a potential decision.

Environmental justice: The fair treatment and meaningful involvement of all people, regardless of natural origin or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies. Fair treatment means that no group of people, including racial, ethnic, or socioeconomic groups, should bear a disproportionate share of the negative environmental consequences resulting from industrial, municipal, and commercial operations or the execution of federal, state, local, and tribal programs and policies. Executive Order 12898 directs federal agencies to achieve environmental justice as part of their missions by identifying and addressing disproportionately high adverse effects of agency programs, policies, and activities, on minority and low-income populations.

Erosion: The wearing away of the land surface by running water, wind, ice, or other geologic agents, including gravitation creep.

Estuary: A partially enclosed body of water formed where freshwater from rivers and streams flows into the ocean, mixing with the salty seawater. Estuaries and the lands surrounding them are places of transition from land to sea, and from fresh to salt water.

Iñupiat: An ethnonym (name given to a group by another group) referring to speakers of the Inuit language family who live in the Arctic and Subarctic regions of North America—Canada, Greenland, and Alaska—and eastern Siberia.

Essential fish habitat (EFH): As defined by Congress in the interim final rule (62 FR 66551), “those waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity.” For the purpose of interpreting the definition of EFH habitat, “waters” are aquatic areas and their associated physical, chemical, and biological properties; “substrate” is sediment underlying the waters; “necessary” refers to the habitat required to support a sustainable fishery and the managed species contribution to a healthy ecosystem; and “spawning, breeding, feeding, or growth to maturity” covers all habitat types that a species uses throughout its life cycle.

Essential road/pipeline crossing: Places where the use authorization indicates the crossing should be to minimize impacts to resources while still achieving the purpose of the project.

Estuary: A partially enclosed body of water formed where freshwater from rivers and streams flows into the ocean, mixing with the salty seawater. Estuaries and the lands surrounding them are places of transition from land to sea, and from freshwater to salt water.

Ethnographic: Of or pertaining to the descriptive and analytical study of the culture of particular self-defined groups or communities.

Exception: A one-time exemption to a lease stipulation, determined on a case-by-case basis.

Exploration: The search for economic deposits of minerals, gas, oil, or coal through the practices of geology, geochemistry, geophysics, drilling, shaft sinking, and mapping.

Exploratory unit: Normally embrace a prospective area delineated on the basis of geological or geophysical inference and permit the most efficient and cost-effective means of developing underlying oil and gas resources.

Fast-ice zone: Area along the coast covered by sea ice that is continuous with and attached to the shoreline.

Feasible: Capable of being accomplished in a successful manner within a reasonable time, taking into account economic, environmental, legal, social, and technological factors.

Federal Register: The official journal of the federal government of the United States, containing government agency rules, proposed rules, and public notices.

Final environmental impact statement (final EIS): A revision of the draft environmental impact statement that includes public and agency comments on the draft.

Fisheries habitat: Streams, lakes, and reservoirs that support fish populations.

Fishery: The act, process, occupation, or season of taking an aquatic species.

Floodplain: The lowland and relatively flat area adjoining inland waters, including, at a minimum, that area subject to a 1 percent or greater chance of flooding in any given year.

Fluvial: Of or relating to a stream or river.

Fossil: Evidence or remnant of a plant or animal preserved in the earth's crust, such as a skeleton, footprint, or leaf print.

Fossil fuel: Petroleum, natural gas, and coal; fuel derived from biological material that was deposited into sedimentary rocks.

Frequency: The number of samples in which a plant or animal species occurs, divided by the total number of samples.

Fugitive dust: Particles suspended randomly in the air, usually from road travel, excavation, or rock loading operations.

Game management unit (GMU): A geographic division made by the Alaska Department of Fish and Game for the management of fish and wildlife in the State. Different GMUs have different hunting and fishing seasons, bag limits, and other harvest rules.

Geology: The scientific study of the origin, history, and structure of the earth; the structure of a specific region of the earth's surface.

Geomorphic: Pertaining to the structure, origin, and development of the topographical features of the earth's crust.

Gill net: Made of one or more layers of mesh, used to catch fish by entanglement as they attempt to swim through the net.

Glacial drift: Unsorted sediments deposited by glaciers and not subsequently reworked by water; coarse-grained materials, such as rock and sand, suspended in a fine-grained matrix, such as silt. The term applies to all mineral material transported by a glacier and deposited directly by or from the ice or by running water emanating from a glacier.

Global warming: An increase over time of the average temperature of the earth's atmosphere and oceans. It is generally used to describe the temperature rise over the past century or so and the effects of humans on the temperature rise.

Gray water: Discharge that includes wastewater from any or all of the following: kitchen sink, shower, drinking water, and laundry.

Greenhouse effect: A process by which thermal radiation from a planetary surface is absorbed by atmospheric greenhouse gases and is reradiated in all directions. Since part of this reradiation is toward the earth's surface and the lower atmosphere, it elevates the average surface temperature above what it would be in the absence of the gases.

Greenhouse gas (GHG): A gas that absorbs and emits thermal radiation in the lowest layers of the atmosphere. This process is the fundamental cause of the greenhouse effect. The primary greenhouse gases that are considered air pollutants are carbon dioxide, (CO₂), methane (CH₄), nitrous oxide (N₂O), and chlorofluorocarbons (CFCs).

Groundwater: Water found beneath the ground occupying the void space in a geologic stratum.

Habitat: The natural environment of a plant or animal, including all biotic, climatic, and soil conditions, or other environmental influences affecting living conditions. The place where an organism lives.

Hazardous air pollutants (HAPs): Also known as toxic air pollutants, those that cause or may cause cancer or other serious health effects, such as reproductive effects or birth defects, or adverse environmental and ecological effects. The Environmental Protection Agency is required to control 187 hazardous air pollutants. Examples of HAPs are benzene (found in gasoline), perchlorethylene (emitted from dry cleaning facilities), and methylene chloride (used as a solvent).

Hazardous waste: As defined by the Environmental Protection Agency, a waste that exhibits one or more of the following characteristics: ignitability, corrosivity, reactivity, or toxicity. Hazardous wastes are listed in 40 CFR 261.3 and 171.8.

Hazardous material: Chemicals, combustible liquids, compressed gases, controlled substances, corrosives, explosives, flammable materials, oxidizers, poisons, radioactive materials, and toxic materials.

Headwaters: The upper reaches of a stream where it forms.

Heavy equipment: Heavy-duty vehicles, specially designed for executing construction tasks, most frequently, ones involving earthwork operations.

Hydrocarbon: A naturally occurring organic compound composed of hydrogen and carbon. Hydrocarbons can occur in molecules as simple as methane (one carbon atom with four hydrogen atoms), but also as highly complex molecules, and can occur as gases, liquids, or solids. The molecules can have the shape of chains, branching chains, rings, or other structures. Petroleum is a complex mixture of hydrocarbons.

Hydrologic system: The combination of all physical factors, such as precipitation, stream flow, snowmelt, and groundwater that affect the hydrology of a specific area.

Hydrogeomorphology: The interaction and linkage of hydrologic processes with landforms in temporal and spatial dimensions

Impermeable: Not permitting passage of fluids through its mass.

Impoundment: The collection and confinement, usually of water (in the case of mining, tailings materials), in a reservoir or other storage area.

Increment: An amount of change from an existing concentration or amount, such as air pollutant concentrations.

Incidental Take Regulation (ITR): Governs the authorization of take of small numbers of marine mammals within a specified geographic region that result from, but are not the purpose of, carrying out an otherwise lawful activity conducted by the Federal agency or applicant. ITRs prescribe permissible methods of taking and other means of effecting the least practicable adverse impact on the affected species.

Indigenous: Having originated in and being produced, growing, living, or occurring naturally in a particular region or environment.

Indirect impact: Impact caused by an action but later in time or farther removed in distance, although still reasonably foreseeable.

Informational site: Sites in this category where records do not represent a distinct contaminated site or identifies a site that has received EPA or DEC Brownfields services and cannot be classified as “active”.

Infrastructure: The underlying foundation or basic framework; substructure of a community, such as schools, police, fire services, hospitals, water, and sewer systems.

Insect-relief area: An area of the North Slope with relatively low numbers of insects that caribou use for relief from insects.

Interstitial ice: Found in cavities or lodged between soil grains or rock crevices.

Irretrievable: Applies to losses of production, harvest, or commitment of renewable natural resources. For example, some or all of the wildlife forage production from an area is irretrievably lost during the time an area is used as an oil or gas development site. If the use changes, forage production can be resumed. The production lost is irretrievable, but the act is not irreversible.

Irreversible: A term that applies primarily to the use of nonrenewable resources, such as minerals or cultural resources, or to those factors that are renewable only over long time spans, such as soil productivity. Irreversible also includes loss of future options.

Isobath: Depth interval contour, as commonly mapped for lake or ocean bottoms.

Jurisdictional wetland: A wetland area delineated and identified by specific technical criteria, field indicators, and other information, for the purposes of public agency jurisdiction. The US Army Corps of Engineers regulates “dredging and filling” activities associated with jurisdictional wetlands. Other federal agencies that can become involved with matters that concern jurisdictional wetlands include the US Fish and Wildlife Service, the Environmental Protection Agency, and the Natural Resource Conservation Service.

Landfast ice: Stationary ice that is attached to the shoreline and extends out into the waterbody.

Landform: Any physical, recognizable form or feature on the earth's surface having a characteristic shape, which is produced by natural causes. Landforms provide an empirical description of similar portions of the earth's surface.

Land management: The intentional process of planning, organizing, programming, coordinating, directing, and controlling land use actions.

Landscape: The sum total of the characteristics that distinguish a certain area on the earth's surface from other areas; these characteristics are a result not only of natural forces, but also of human occupancy and use of the land. An area composed of interacting and interconnected patterns of habitats (ecosystems), which are repeated because of geology, landforms, soils, climate, biota, and human influences throughout the area.

Land status: The ownership status of lands.

Land use allocation: The assignment of a management emphasis to particular land areas with the purpose of achieving the goals and objectives of some specified use(s) (e.g., campgrounds, wilderness, logging, and mining).

Laterally discontinuous: Not continuous in the horizontal plane. For example, in an area with laterally discontinuous permafrost, the permafrost is not uniformly found across the entire area without interruption.

Lead: Long cracks in the ice, used by both whales and boats to travel through the water.

Letter of Authorization (LOA): Authorization issued by the USFWS for incidental takes that may cause death or serious injury to marine mammals for a term of five years or less. The LOA must be in accordance with Incidental Take Regulations.

Listed species: Species that are listed as threatened or endangered under the Endangered Species Act of 1973 (as amended).

Local hydrologic conditions: The state of water bodies, including discharge of streams, lake volumes, connectivity between water bodies, water quality, and further variables which contribute to the function of water bodies to the environment.

Long-term impacts: Impacts that normally result in permanent changes to the environment. An example is the loss of habitat due to development of a gravel pit. For each resource, the definition of long-term may vary.

Maintain natural runoff processes: Prevent impact to natural runoff processes from permitted activities. Runoff is the portion of precipitation which travels quickly into surface water bodies. Surface runoff travels over the ground to water bodies without infiltrating the soil. Subsurface runoff, or interflow, infiltrates the upper later soil and travels relatively quickly, just below the surface, into water bodies. Alternative to runoff is the portions of precipitation which are taken up by evapotranspiration or that which infiltrate deeper into the ground, recharging the groundwater reservoir. The runoff ratio is the proportion of precipitation that enters water bodies as runoff. Variables which influence runoff ratio

include land use, vegetation, soil type, topography, and drainage network patterns. Runoff plays a significant role in erosional processes and is the main factor in flood events.

Major construction activity: Creation or construction of infrastructure using heavy equipment, causing surface disturbance.

Management activity: A human activity imposed on a landscape for the purpose of harvesting, traversing, transporting, or replenishing natural resources.

Management area: An area delineated on the basis of management objective prescriptions.

Management concern: An issue, problem, or condition that influences the range of management practices identified in a planning process.

Management direction: A statement of multiple use and other goals and objectives, and the associated management prescriptions, standards, and guidelines for attaining them (36 CFR 219.3).

Marine: Of, found in, or produced by the sea.

Masu: A starchy tuber found in arctic and subarctic regions (vernacular is “Eskimo potato”).

Mean: A statistical value calculated by dividing the sum of a set of sample values by the number of samples. Also referred to as the arithmetic mean or average.

Mean high water mark: With respect to ocean and coastal waters, the line on the shore established by the average of all high tides. It is established by survey based on available tidal data (preferably averaged over a period of 18.6 years because of the variations in tide). In the absence of such data, less precise methods to determine the mean high-water mark are used, such as physical markings, lines of vegetation or comparison of the area in question with an area having similar physical characteristics for which tidal data are readily available.

Modification: A change to a lease stipulation either temporarily or for the life of the lease.

Migratory: Moving from place to place, daily or seasonally.

Migratory fish: A freshwater fish or fish species that migrates short or long distances between habitats, which can include inter and intra movements between freshwater, estuarine, or marine habitats, to complete its life cycle.

Minimize: Reduce or decrease. Per 40 CFR Part 1508.1(s)(2), “minimizing impacts by limiting the degree or magnitude of the action and its implementation”

Mitigation: Steps taken to: (1) avoid an impact altogether by not taking a certain action or parts of an action; (2) minimize an impact by limiting the degree or magnitude of the action and its implementation; (3) rectify an impact by repairing, rehabilitating, or restoring the affected environment; (4) reduce or eliminate an impact over time by preserving and maintaining operations during the life of the action; and, (5) compensate for an impact by replacing or providing substitute resources or environments (40 CFR Part 1508.20).

Memorandum of Understanding (MOU): Usually documents an agreement reached among federal agencies.

Moraines: Accumulations of glacial debris.

Muktuk: Eskimo delicacy consisting of the skin and the thin layer of subcutaneous fat of whales.

National Environmental Policy Act (NEPA): An act declaring a national policy to encourage productive and enjoyable harmony between humankind and the environment; promote efforts to prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of humanity; enrich the understanding of the ecological systems and natural resources important to the nation; and establish a Council on Environmental Quality.

National Pollutant Discharge Elimination System (NPDES): A program authorized by sections 318, 402, and 405 of the Clean Water Act, and implemented by regulations 40 CFR 122. The NPDES program requires permits for the discharge of pollutants from any point source into waters of the United States.

Natural flow of rivers: The flow conditions for a river unaffected by human activity. Flow conditions include to the timing and magnitude of high and low discharge periods, the annual total discharge, the location of auefis, the location of ice jamming or debris damming, and channel geomorphology progression.

Natural flow regime: The magnitude, frequency, duration, timing, and rate of change of flow events that characterize the hydrology of a natural reiver environment.

Natural function: When unaffected by human activity, the services provided or processes performed by an environment. As in Lease Stipulation 1, natural function refers to the ecological environment and geomorphological force provided by rivers and streams unaffected by permitted activities.

Nearshore: Marine waters within the Arctic Refuge boundary.

Net present value (NPV): The difference between the discounted value (benefits) of all outputs to which monetary values or established market prices are assigned and the total discounted costs of managing the planning area.

No-Surface-Occupancy (NSO): An area that is open for mineral leasing but does not allow the construction of surface oil and gas facilities in order to protect other resource values. Facilities such as essential roads, pipelines, a dock, and a seawater treatment/desalinization plant may be allowed in these areas on a case-by-case basis.

Non-Associated Gas: Gas in a reservoir having little or no crude oil.

NO_x: Mono-nitrogen oxides, including nitric oxide (NO) and nitrogen dioxide (NO₂). It is formed when naturally occurring atmospheric nitrogen and oxygen are combusted with fuels in automobiles, power plants, industrial processes, and home and office heating units.

Objective: A concise, time-specific statement of measurable planned results that respond to pre-established goals. An objective forms the basis for further planning to define the precise steps to be taken and the resources to be used to achieve identified goals.

Offshore: (1) In beach terminology, the comparatively flat zone of variable width, extending from the shoreface to the edge of the continental shelf. It is continually submerged. (2) The direction seaward from the shore. (3) The zone beyond the nearshore zone where sediment motion induced by waves alone effectively ceases and where the influence of the seabed on wave action is small in comparison with the effect of wind. (4) The breaker zone directly seaward of the low tide line.

Oiled: Having oil on skin, fur, or feathers after coming into contact with an oil spill.

Ordinary High-Water Mark: The line on the shore established by the fluctuations of water and indicated by physical characteristics such as a clear, natural line impressed on the bank, shelving, changes in the character of soil, destruction of terrestrial vegetation, the presence of litter and debris, or other appropriate means that consider the characteristics of the surrounding areas.

Other hazardous materials: are methanol, propylene and ethylene glycol (antifreeze), water soluble chemicals, corrosion inhibitor, scale inhibitor, fire-fighting foam (aqueous film forming foam), drag reducing agent (e.g., DRA Flo XL), and biocides.

Ozone: Form of oxygen found largely in the stratosphere; a product of the reaction between ultraviolet light and oxygen.

Paleontology: The study of life in past geologic time based on fossil plants and animals and including phylogeny, their relationships to existing plants, animals, and environments, and the chronology of the Earth's history

Paleontological resource: A locality containing vertebrate, invertebrate, or plant fossils (i.e., fossil location, fossil bearing formation or a formation with the potential to bear fossils).

Paleontological site: a locality, location, or area where a paleontological resource is found; the site can be relatively small or large.

Particulates: Small particles suspended in the air, generally considered pollutants.

Pelagic: Pertaining to the ocean and especially to animals (typically marine mammals, birds, or fish) that live at the surface of the ocean away from the coast.

Per capita income: Total income divided by the total population.

Performance-based stipulation: A stipulation applied to a lease that provides a stated objective that must be met, along with requirements and guidelines, but provides some leeway as to how that objective can be met and maintained by the lessee; compare to prescriptive-based stipulation.

Permafrost: Permanently frozen ground.

Permanent oil and gas facilities: Production facilities, pipelines, roads, airstrips, production pads, docks, seawater treatment plants, and other structures associated with oil and gas production that occupy land for more than one winter season. Material sites and seasonal facilities, such as ice roads, are excluded, even when the pads are designed for use in successive winters. Gravel mines are also included as permanent oil and gas facilities.

Permeability: The property or capacity of a porous rock, sediment, or soil for transmitting a fluid; a measure of the relative ease of fluid flow under unequal pressure.

Photoperiod: In reference to cycles of light and darkness, the length of time that uninterrupted light is present, generally the length of daylight in a given 24-hour period.

Physiographic province: A region having a particular pattern of relief features or land forms that differs significantly from that of adjacent regions (e.g., Arctic Coastal Plain).

Pingo: A low conical hill or mound forced up by hydrostatic pressure in an area underlain by permafrost and consisting of an outer layer of soil covering a core of solid ice. Pingos range from 6 to 160 meters in height.

Plant community: A vegetation complex, unique in its combination of plants, which occurs in particular locations under particular influences. A plant community is a reflection of integrated environmental influences on the site, such as soils, temperature, elevation, solar radiation, slope aspect, and precipitation.

Polar bear dens: Polar bear dens can be divided into three types, potential dens, putative maternal dens, and known dens. Potential dens are those identified visually as a possible polar bear den but have not yet been surveyed with FLIR. Putative maternal dens are hotspots with the “right” signature detected during a FLIR survey (see York et al. 2004). Known dens are those with confirmed occupation, either through telemetry or video evidence of emergence.

Pollution: Human-caused or natural alteration of the physical, biological, and radiological integrity of water, air, or other aspects of the environment that produce undesired effects.

Poly- and perfluoroalkyl substances: May be found in hydraulic fluids and fire-fighting foams.

Polygon: A surface landform resulting from repeated freeze-thaw cycles common in permafrost areas. Polygons are bounded by troughs of ice or water and generally occur in networks that form regular geometric designs with multiple square sides of nearly equal lengths.

Polynyas: Non-linear openings in the sea ice.

Pool: A subsurface oil accumulation.

Porosity: The ratio of the volume of void space in a material (e.g., sedimentary rock or sediments) to the volume of its mass.

Potable: Suitable, safe, or prepared for drinking, as in potable water.

Pot hunting: The removal or theft of artifacts from cultural resource sites by untrained individuals for profit and recreation.

Practical alternative: A method for achieving project objectives that is different from what the applicant proposed, but is still technically and economically feasible.

Prescriptive-based stipulation: A stipulation applied to leases with exacting requirements applying to lessee activities; compare to performance-based stipulation.

Prevention of significant deterioration (PSD): A special permit procedure established in the Clean Air Act, as amended, used to ensure that economic growth occurs in a manner consistent with the protection of public health and preservation of air quality related values in national special interest areas.

Pristine: Pure, original, and uncontaminated.

Produced fluids: Fluids composed of crude oil, natural gas, and brine and formation sand

Prospect: An area of exploration in which hydrocarbons have been predicted to exist in commercially recoverable quantities.

Protect natural flow: Reduce impact to natural flow conditions from permitted activities.

Public scoping: A process whereby the public is given the opportunity to provide oral or written comments about the influence of a project on an individual, the community, and/or the environment.

Pulse: A group of whales; the term is applied to whales migrating across the Chukchi and Beaufort seas, when there are more individuals in each pod of whales and more pods than usual.

Putrescible: Liable to decay.

Pyrogenic: Producing or produced by heat.

Quaternary unconsolidated sediments: Sediments deposited during the Quaternary Period that have not been lithified.

Raptor: Bird of prey; includes eagles, hawks, falcons, and owls.

Recharge: Absorption and addition of water into the zone of saturation.

Record of Decision (ROD): A document separate from, but associated with, an environmental impact statement, which states the decision, identifies alternatives (specifying which were environmentally preferable), and states whether all practicable means to avoid environmental harm from the alternative have been adopted, and, if not, why not (40 CFR 1505.2).

Reclamation: Reclamation helps to ensure that any effects of oil and gas development on the land and on other resources and uses are not permanent. The ultimate objective of reclamation is ecosystem restoration, including restoration of any natural vegetation, hydrology, and wildlife habitats affected by

surface disturbances from construction and operating activities at an oil and gas site. In most cases, this means a condition equal to or closely approximating that which existed before the land was disturbed.

Recoverable reserves: Oil and gas reserves that may be recoverable by the application of technology, but not necessarily commercially recoverable.

Refined oil: Arctic diesel, Jet-A 50, unleaded gasoline, hydraulic fluid, transmission oil, lubricating oil and grease, waste oil, mineral oil, and other products.

Regulated air pollutants: Pollutants first set forth in the Clean Air Act of 1970 and are the basis upon which the Federal government and state regulatory agencies have established emission thresholds and regulations. Regulated air pollutants include criteria air pollutants, hazardous air pollutants (HAPs), volatile organic compounds (VOCs), and greenhouse gases. The same pollutant may be regulated under more than one of the regulatory standards.

Reservoir (oil or gas): A subsurface body of rock having sufficient porosity and permeability to store and transmit fluids. Sedimentary rocks are the most common reservoir rocks because they have more porosity than most igneous and metamorphic rocks and form under temperature conditions at which hydrocarbons can be preserved. A reservoir is a critical component of a complete petroleum system.

Resident: A species that is found in a particular habitat for a particular time period (e.g., winter resident or summer resident) as opposed to a species found only when passing through during migration.

Resource Function: The value(s) provided by a natural resource to the larger ecosystem.

Required Operating Procedure (ROP): Procedures carried out during proposal implementation which are based on laws, regulations, executive orders, BLM planning manuals, policies, instruction memoranda, and applicable planning documents.

Rideup: A raised-relief ice formation that is formed when a moving ice sheet is forced up and over other structures such as land or ice.

Riffles: Stream segments where the water is relatively shallow, current velocity is relatively high, and sediments are coarse; riffles are located in between areas of deeper, slower water (pools).

Rift zone: Zone of faulting where rocks are pulled apart.

Right-of-way (ROW): Public lands that the BLM authorizes a holder to use or occupy under a grant; examples are roads, pipelines, power lines, and fiber optic lines.

Riparian: Occurring adjacent to streams and rivers and directly influenced by water. A riparian community is characterized by certain types of vegetation, soils, hydrology, and fauna and requires free or unbound water or conditions more moist than that normally found in the area.

Risked mean: The arithmetic average of all possible resource outcomes weighted by their probabilities. Risked (unconditional) estimates of resources such as oil or natural gas consider the possibility that the area may be devoid of those resources. Statistically, the risked mean may be determined through multiplication of the mean of a conditional distribution by the related probability of occurrence.

River/Stream/Creek: Natural flowing watercourses. There is no definitive rule for what may be considered a river versus a stream versus a creek. Typically, “river” is used to describe the largest flowing bodies and “stream” or “creek” for smaller flowing bodies.

Rolligon: A brand name or make of wheeled vehicle that exerts low pressure on the ground and is designed to travel across sensitive areas such as tundra with minimal disturbance.

Salt water: Treated water from the proposed Seawater Treatment Facility.

Saltwater wedge: A wedge-shaped layer of salty water flowing underneath freshwater in a river.

Sanitary/Domestic Wastewater: Water-borne human wastes or graywater from dwellings, commercial buildings, institutions, or similar structures. Domestic wastewater includes the contents of individual removable containers used to collect and temporarily store human wastes.

Satellite field: An oil reserve located near an existing oil development, allowing shared use of the infrastructure.

Scenic River: River designation, under the Federal Wild and Scenic Rivers Program, on the basis of undisturbed and scenic character. Scenic rivers are given special management criteria by federal agencies.

Scoping process: A part of the National Environmental Policy Act process; early and open activities used to determine the scope and significance of the issues, and the range of actions, alternatives, and impacts to be considered in an Environmental Impact Statement (40 CFR 1501.7).

Sediments: Unweathered geologic materials generally laid down by or within waterbodies; the rocks, sand, mud, silt, and clay at the bottom and along the edge of lakes, streams, and oceans.

Seismic: Relating to or denoting geological surveying methods involving vibrations produced artificially by explosions.

Seismic hazard: The potential for earthquakes to cause damage.

Sensitive species: Plant or animal species that are susceptible or vulnerable to activity impacts or habitat alterations. Species that have appeared in the *Federal Register* as proposed for classification or are under consideration for official listing as endangered or threatened species.

Setback: A distance by which a structure or other feature is set back from a designated line.

Short-term impacts: Impacts occurring during project construction and operation, and normally ceasing upon project closure and reclamation. For each resource, the definition of short-term may vary.

Significant: The description of an impact that exceeds a certain threshold level. Requires consideration of both context and intensity. The significance of an action must be analyzed in several contexts, such as society as a whole, and the affected region, interests, and locality. Intensity refers to the severity of impacts, which should be weighted along with the likelihood of its occurrence.

SO_x: Sulfur oxides, including sulfur dioxide (SO₂). A product of vehicle tailpipe emissions.

Sociocultural: Of, relating to, or involving a combination of social and cultural factors.

Socioeconomic: Pertaining to or signifying the combination or interaction of social and economic factors.

Soil horizon: A layer of soil material approximately parallel to the land surface that differs from adjacent genetically related layers in physical, chemical, and biological properties.

Solid waste: Garbage or refuse consisting of food wastes, sewage sludge, fire-fighting foam, and other nonhazardous burnable and unburnable wastes

Spawning: Production, deposition, and fertilization of eggs by fish.

Special use permit: A permit issued under established laws and regulations to an individual, organization, or company for occupancy or use of federal or state lands for some special purpose.

Spill: The releasing, leaking, pumping, pouring, emitting, emptying, discharging, injecting, escaping, leaching, dumping, or disposing into the environment. Does not include a permitted release(s).

Very small spill: Spill less than 0.24 barrels (10 gallons)

Small spill: Spill between 0.24 to 2.37 barrels (10 to 99.5 gallons)

Medium spill: Spill between 2.38 to 23.7 barrels (100 to 999.5 gallons)

Large spill: Spill between 23.8 to 2,380 barrels (1,000 to 100,000 gallons)

Very large spill: Spill greater than 2,380 barrels (100,000 gallon)

Spill Prevention Control and Countermeasure Plan (SPCC): A plan that the Environmental Protection Agency requires to be on file within six months of project inception. It is a contingency plan for avoidance of, containment of, and response to spills or leaks of hazardous materials.

Spill rate: The frequency of spills for a given activity (e.g., transportation of hazardous materials).

Standard: A model, example, or goal established by authority, custom, or general consent as a rule for the measurement of quantity, weight, extent, value, or quality.

Stipulation: A requirement or condition placed by the Bureau of Land Management on the leaseholder for operations the leaseholder might carry out within that lease. The Bureau of Land Management develops stipulations that apply to all future leases within the Arctic Refuge Coastal Plain.

Stratigraphic trap: An oil or gas reservoir in which the hydrocarbons are trapped because of a lateral change in the physical characteristics of the reservoir or a change in the lateral continuity of the rocks.

Strike: The act of throwing a darting gun harpoon with a black powder or penthrite bomb into a whale. A strike may or may not result in a dead whale, which may or may not result in a landed whale. The International Whaling Commission considers and counts the number of strikes and landed whales in their

quota allocation to the US government (and hence to the Alaska Eskimos). Unused strikes can be transferred to other individuals or groups harvesting whales.

Subsistence: A traditional way of life in which wild renewable resources are obtained, processed, and distributed for household and community consumption according to prescribed social and cultural systems and values.

Subsistence use areas: The geographic extent of a resident's or community's use of the environment to conduct traditional subsistence activities.

Talik: An unfrozen section of ground found above, below, or within a layer of discontinuous permafrost. These layers can also be found beneath waterbodies in a layer of continuous permafrost.

Technically recoverable: Amount of oil or gas that can be recovered from a formation using current technology and practices.

Technically recoverable volume: The amount of a resource in place that is estimated to be able to be produced using existing technology with no consideration given to the cost versus profit of doing so.

Terrestrial: Of or relating to the earth, soil, or land; inhabiting the earth or land.

Thermokarst: Terrain alteration, such as subsidence and water pooling, that results from the melting of ground ice in a region underlain by permafrost.

Threatened species: A plant or animal species likely to become an endangered species throughout all or a significant portion of its range within the foreseeable future.

Thrust faulted: A fault in which rocks have been pushed up and over adjacent rocks.

Timing Limitation (TL): This stipulation, a moderate constraint, is applicable to fluid mineral leasing, all activities associated with fluid mineral leasing (e.g., truck-mounted drilling and geophysical exploration equipment off designated routes, and construction of wells and pads), and other surface-disturbing activities (i.e., those not related to fluid mineral leasing). Areas identified for TL are closed to fluid mineral exploration and development, surface-disturbing activities, and intensive human activity during identified time frames. This stipulation does not apply to operation and basic maintenance, including associated vehicle travel, unless otherwise specified. Construction, drilling, completions, and other operations considered to be intensive are not allowed. Intensive maintenance, such as workovers on wells, is not permitted. TLs can overlap spatially with no surface occupancy and controlled surface use, as well as with areas that have no other restrictions.

Total petroleum system: The combination of geologic components and processes necessary to generate and store hydrocarbons, including a mature source rock, migration pathway, reservoir rock, trap, and seal. Includes all the petroleum generated by related source rocks and resides in a volume of mappable rocks. Geologic processes act upon the petroleum system and control the generation, expulsion, migration, entrapment, and preservation of petroleum.

Traditional knowledge: Traditional Knowledge (TK) is a living body of knowledge which pertains to explaining and understanding the universe and living and acting within it. It is acquired and utilized by

indigenous communities and individuals in and through long-term sociocultural, spiritual, and environmental engagement. TK is an integral part of the broader knowledge system of indigenous communities, is transmitted intergenerationally, is practically and widely applicable, and integrates personal experience with oral traditions. It provides perspectives applicable to an array of human and non-human phenomena. It is deeply rooted in history, time, and place, while also being rich, adaptable, and dynamic, all of which keep it relevant and useful in contemporary life. This knowledge is part of, and used in, everyday life, and is inextricably intertwined with peoples' identity, cosmology, values, and way of life. Tradition – and TK – does not preclude change, nor does it equal only 'the past'; in fact, it inherently entails change

Transfer payment: Money given by the government to citizens, such as Social Security, welfare, and unemployment compensation.

Trophic system: The process and organisms that move food energy through the ecosystem, often termed a food chain.

Tundra: Level or undulating treeless plain characteristic of northern Arctic regions, consisting of black mucky soil with permanently frozen subsoil and a dense growth of mosses, lichens, dwarf herbs, and shrubs.

Turbidity: A measure of the amount of suspended sediment in water.

Turbidites: Sedimentary deposits formed by underwater landslides.

Tussock: A small area of grass that is thicker or longer than the grass growing around it.

Unavailable: When referring to oil and gas leasing, unavailable lands would not be offered for oil and gas leasing.

Unconventional oil and gas: Reservoir oil and gas that cannot be efficiently extracted using conventional methods, examples include shale gas and tar sands.

Vibroseis: A device which uses a truck-mounted vibrator plate coupled to the ground to generate a wave train up to seven seconds in duration and comprising a sweep of frequencies. The recorded data from an upsweep or downsweep (increasing or decreasing frequency respectively) are added together and compared with the source input signals to produce a conventional-looking seismic section. The device is used increasingly in land surveys instead of explosive sources.

Volatile Organic Compounds (VOCs): A group of chemicals that react in the atmosphere with nitrogen oxides in the presence of sunlight and heat to form ozone. VOCs contribute significantly to photochemical smog production and certain health problems. Examples of VOCs are gasoline fumes and oil-based paints.

Waiver: A permanent exemption to a stipulation or lease.

Waterbody: A jurisdictional Water of the United States (see 33 CFR 328.4). Examples of “waterbodies” include streams, rivers, lakes, ponds, and wetlands.

Waterflooding: The injection of water into geological reservoirs to maintain or increase pressure in the reservoir and thereby assist in the extraction of oil.

Water quality: The chemical, physical, thermal, and biological properties of water suitable for aquatic organisms within a particular aquatic system. The interaction between various parameters that determines the usability of water for on-site and downstream uses. Major parameters that affect water quality include: temperature, turbidity, suspended sediment, conductivity, dissolved oxygen, pH, specific ions, discharge, and fecal coliform. In ROP 19, refers to the condition of water required to support natural biodiversity. Alaska state water quality standards are defined in ADEC 18 AAC 70. Further criteria for water quality may be defined on a case-by-case basis by BLM/USFWS as site-specific environmental analysis is done for specific proposed activities as required by NEPA.

Wetlands (biological wetlands): Those areas that are inundated or saturated by surface water or groundwater at a frequency and duration sufficient to support, and that under normal circumstance do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands include habitats such as swamps, marshes, and bogs (see jurisdictional wetlands).

Wild and Scenic Rivers: Those rivers or sections of rivers that are free of impoundments, with shorelines or watersheds still largely primitive and shorelines largely undeveloped, but accessible in places by roads.

Wilderness: A wilderness, in contrast with those areas where man and his works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammelled by man, where man himself is a visitor who does not remain. An area of wilderness is further defined to mean in this Act an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least five thousand acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

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