

**Supplement to the Scoping Report
Alaska Outer Continental Shelf (OCS) Region
North Aleutian Basin Planning Area
Oil and Gas Lease Sale 214
Environmental Impact Statement**

**Aleutians East Borough's
North Aleutian Basin Lease Sale 214 EIS
Summary of Resident Concerns
(February 17, 2009)**

North Aleutian Basin Lease Sale 214 EIS Summary of Resident Concerns

Purpose: This document was prepared at the request of Aleutian East Borough (AEB). The goal of this document was to compile a list of resident comments and concerns on the North Aleutian Basin Lease Sale 214. This list will be used by AEB to ensure that resident concerns are addressed in the Environmental Impact Statement (EIS) currently being prepared by the Minerals Management Service (MMS) for North Aleutian Basin Lease Sale 214. Comments were extracted from MMS notes taken at the EIS Scoping Meetings held May through September of 2008 in Anchorage, Kodiak, Unalaska, Naknek, Dillingham, King Salmon, Sand Point, Nelson Lagoon, Cold Bay, and King Cove.

Air Quality

- Emissions impacts.

Water Quality

- Subsistence stream impacts and need to prevent oil and other pollutant contamination.
- Global water security.
- Ocean acidification.
- Ballast water discharges - current U.S. Coast Guard regulations are insufficient.

Marine Mammals

- Unimak Pass whale habitat impact. A person should be stationed at Scotch Cap to observe right whales; a much less expensive technique than boat surveys.
- Drilling waste impact on walrus.
- Potential damage to marine mammals.
- Changes in migration patterns—more walrus on islands instead of ice.
- Threat of seismic testing on right whales and fish.

Terrestrial Mammals

- Pipeline impacts on caribou, moose, and bear.

Marine and Coastal Birds

- Potential risks and damage to migratory birds, and marine birds.
- Emperor Geese and Black Brandt depend on eel grass beds.

Fisheries

- Crabs unable to climb over the pipeline. Would pipelines be raised so crab could get under?
- Crab pots may hang up on the pipelines.
- Seismic effects on crab.
- Why should a \$150 million per year crab fishery take the risk of oil and gas development?
- Need to examine current and potential future crab habitat use areas, since crab move over time.
- Need for more crab baseline studies; there are too few studies on location of juvenile crab and gravid females.
- “Slime Banks” [~100km east of Izembek] is one of the richest areas of productivity. This area needs to be protected.
- Drilling mud impacts.
- Need for a good baseline study of all life stages of all species.
- Need to understand how seismic activities may affect crustaceans and fin fish.
- Salmon life cycle impacts.
- Herring migration impacts.
- Concern over driving walrus population at Cape Seniavin into fishing grounds and operations.
- Plankton impacts.
- Impacts on cod fishery.
- Oil spill impacts on fisheries and marine resources.
- Impacts from invasive species on fisheries.
- Need more study of coastal salmon fisheries.
- Herring eggs on kelp have diminished recently.
- Need for seismic activity sound abatement.
- Need to determine noise effects of geophysical testing on salmon smolt and juvenile halibut.
- Further investigation needs to be done to validate Norway’s reports of decreases in cod catches due to seismic testing.
- A study should examine the timing of smolt returns and how seismic testing affects fish and salmon migrations.
- Concern of tankers interfering with set nets sites in Balboa Bay.
- A study on the impact to drift net fisheries.
- Impact on commercial fisheries.
- Impact on smolt migrating to Nunivak Island as well as coastal halibut nurseries.
- There is limited research on the migration patterns of salmon and forage fish like herring. Need to study how warming and cooling cycles play a part in this migration; the age composition of the salmon, where they swim and pool at the Port Moller areas. Needs to accurately chart salmon

migration patterns. When it's cold salmon numbers decline and shrimp and crab numbers increase. MMS needs to study this and document it.

- Review the effects of the 30-year oscillation in Bristol Bay, determine age composition and swim locations of salmon and herring, and review circulation patterns.
- Home Land Security issues (patrol boats around set net sites).
- International Pacific Halibut Commission (IPHC) has a fish treaty between the US and Canada, which closes the area from False Pass to Sarachef because it is a halibut nursery area. This area overlaps the 214 Sale area.

Coastal Habitats

- Critical habitat loss.
- Coastal erosion and climate changes.
- Izembek Wildlife Refuge and Lagoon are at risk of an oil spill.
- Sensitive habitat areas need to be protected.
- Potential devastating impacts to six (6) wildlife refuges and State refuges.

Local Hire and Training

- Will local hire make a substantial economic difference? Is it worth the risk?
- Jobs provided to Alaskans and other U.S. citizens from commercial fishing.
- Impact on fishing jobs in the Delta Region.
- Loss of fishing jobs if there is a spill. Will 100 new oil and gas jobs be worth the risk of losing thousands of fishing jobs?
- Local hire –on the North Slope the Village of Nuiqsut only got two local people jobs at an oil and gas facility only four miles from their village.
- How will new oil and gas jobs affect the lifestyles of the residents?
- Include offshore aqua-culture impacts; because approximately 49% of the world's food is provided by aqua-culture.
- Develop training programs based on jobs the oil companies will be providing.
- Oil and gas development will provide a local industry for future generations.

Economic Issues

- Evaluate the economic contribution to the nation's seafood supply.
- Perception that Bristol Bay fish may be tainted by oil and gas production could affect prices.
- *“Originally opposed lease Sale 92 in the late 80s because fishing prices were good and fuel was cheap. Now I'm supportive because the cost of gas and heating fuel has increased. But the more meetings I go to, I realize Bristol Bay Borough won't benefit economically from an oil and gas lease sale. The same impacts we could be faced with are still there. We would only get 20-30 out of 600*

available jobs and to me this isn't a big enough economic difference. Now energy costs are so high, we were really hoping for a benefit to offset the high energy costs we pay in rural Alaska."

- Look at economic factors on people who depend on salmon.
- Federal vs. state royalty revenue sharing.
- How would each local borough receive taxes from oil and gas activity?
- Alaska doesn't benefit like three other states. We need to get federal revenue sharing for Alaska.
- EIS should examine the effects on the ecosystem over a 10 to 15 to 25 year timeframe. Need to consider economic and social perspective where values could be put on components such as human capital and manufactured capital as well as environmental impact.

Social Systems/Subsistence

- Economic crisis resulting in out-migration from many communities.
- Subsistence impacts.
- Consider the social and economic impacts.
- Honor subsistence rights.
- Loss of Native foods is not healthy.
- Technology is invading and adversely affecting our culture.
- Protection of traditional cultural resources.
- Socio-economic impacts of traditional foods and the rising cost of food.
- NAB is a critical subsistence use area for all migratory birds, fish, and marine mammals.
- NAB has been fighting to regain cultural losses.
- Impacts of actual oil and gas lease sale and development and how that would affect communities present and future.
- Impacts on berry picking along the coast.

Archaeological Resources

- Archaeological sites at risk.

Transportation Utility Corridors & Infrastructure Siting

- Pipelines should be installed underground.
- Risk of pipeline construction in active seismic areas.
- Visual impacts of a pipeline from Herendeen Bay to Balboa Bay and effects of high winds on a pipeline structure.
- What alternate uses of facilities are being contemplated after decommissioning of oil and gas facilities?
- Pipelines need to be considered instead of marine transport.

- What would the cost be for Liquid Natural Gas (LNG) plants in two ports?
- Risk of LNG Plant explosion (noncombustible explosions when gas heats up).
- Environmental hazards of LNG release vs. a crude oil release.
- Blast effects if a ship explodes.
- Need for better medical facility for emergency preparedness.
- Balboa Bay could be affected by different siltation rates and the harbor would likely need to be dredged to accommodate tanker traffic.
- Designated shipping lanes. Increased danger risk with more shipping and captains from outside that don't know the Bering Sea.

Information Need

- Delay the start of the process until all of the science is in.
- Insufficient baseline data to prepare an EIS; most of the data is old.
- A comprehensive Bering Sea assessment including all of available information on biology, climate change, etc.—ecosystem wide.
- Recognize changes in global climate and how it affects Bristol Bay.
- If tribes have to have up to five (5) years of data to support a project then feds should have five years of data too.
- MMS is also responsible for alternative energy. The EIS should describe the opportunities for renewable energy development and not just oil development.
- Offshore aqua-culture needs to be considered in EIS.
- Need for MMS studies to be updated for Bristol Bay.
- MMS should consider new studies on Beluga whales.
- Would like EIS to examine the effects on the ecosystem over a 10 to 15 to 25 year timeframe. Need to consider economic and social perspective where values could be put on components such as human capital and manufactured capital as well as environmental.
- Need for seismic studies in Bristol Bay.
- Fear that funding is what drives the studies.
- Draw on local knowledge when preparing for the lease sale.
- MMS needs to provide a marine mammal biologist and documents to explain how they can protect life styles instead of a wildlife biologist.
- Does MMS follow up on studies?

Scoping Consultation and Public Notice Process

- Set up Inter-Tribal Meetings.
- Increase the lead times for meetings—not enough notice.

- Hold meetings in the Yukon-Kuskokwim Delta villages.
- Request meetings to be recorded, transcribed and made available to public.
- Received no notice of meetings.
- Need for bilingual and disabled communications.
- Need for meetings in Dillingham and Naknek.
- Bristol Bay is the name, not North Aleutian Basin. Name change is duplicitous and confuses the issue. This lease sale will affect Bristol Bay. Most people know and commonly refer to Bristol Bay as an important fisheries area, not the North Aleutian Basin.
- How are comments weighted and measured? What constitutes substantive and non-substantive comments?
- Tribes feel neglected, precluded, excluded, and diminished.
- Include Nelson Island community in scoping process.
- Include Nelson Island residents in cost benefit analysis.
- Consider Dillingham consensus that was drafted against oil and gas development in 2006 as public comment.
- Include Traditional Ecological Knowledge (TEK).
- Is there a requirement of notice for scoping meetings?
- The more people attending meetings, the more diverse information - might get more, different, and helpful comments.
- There must be meaningful consultation with residents.
- Include Bristol Bay tribes in the process.
- Include Bethel in meeting process.
- When will oil companies develop their leases?
- Can lease sale be stopped in the middle of the process?
- Regional Citizens' Advisory Council (RCAC) should have input.
- Ask for General Accounting Office (GAO) review of the process and MMS leasing program.
- Use alternative energy first like Arizona and California.
- Complete a thorough analysis of the "no action" alternative not just a cursory look.
- Explore the onshore resources first.
- Where is the gas going?
- Development should remain onshore, not offshore.
- Inventory of the resources need to be made so a plan can be developed.
- Assess the regulators ability to regulate.
- MMS is a broker for the outside oil industry.

Oil Spills

- Risks of giant sea ice being blown by 50 mile per hour winds.
- Examine effective cleanup technology for Arctic conditions.
- Does oil spill cleanup equipment exist for areas with heavy sea ice?
- Need seasonal limitation on exploration and drilling to mitigate potential for an oil spill.
- How would an underwater spill be detected?
- Need to examine the effects of an underwater natural gas leak.
- Bering Sea weather impacts on risk of an oil spill.
- Examine how MMS plans to consecutively evaluate the risk of small and large oil spills. Because of the location of the proposed sale area, it is expected that the level of economic benefit will not be sufficient to offset potential effects.
- Need to determine who is responsible for oil spill cleanup.
- Need to be prepared for an oil spill.
- *"It cost \$117 million to clean up the Salangdang Ayu tanker spill- we are still dealing with Exxon over the Prince William Sound Exxon Valdez oil spill 19 years later - consider effects on the larger Bering Sea scale."*
- Atmospheric conditions would prevail if a spill occurs in the Northern part of the lease area, carrying oil into Bristol Bay and it's estuaries, contaminating eelgrass and clam beds and ultimately having an adverse affect on the food chain to marine mammals, fish, and birds.
- Impact of wave heights in Bristol Bay and their effect on spill containment.
- Examine the chance of a 100 year storm.

Compensation Related to an Oil Spill

- Analyze the costs of a catastrophic oil spill in the area, statewide, include the arctic and NAB in the analysis.
- Need a true, legitimate evaluation of what an oil spill would cost in terms of socio-economic and environmental impact.
- What are the socio-economic benefits and gains for the Lake & Peninsula Borough and other communities? This should be evaluated along with the oil spills so the public can assess the risk vs. the gain.
- In the case of an oil spill would fisherman be compensated at today's prices or future prices?
- Instead of going through spill litigation, oil companies should be required to have a compensation bond so we don't repeat the Exxon on Prince William Sound Oil spill settlement mistakes.
- How will local boroughs be compensated in case of a spill?
- Will a spill contingency fund be set up?
- What compensation will Naknek, King Salmon, and the Bristol Bay Borough get in case of an oil spill? Consider cultural values when being compensated for an oil spill.