UNITED STATES DEPARTMENT OF COMMERCE
National Oceanic and Atmospheric Administration
National Marine Fisheries Service
P.O. Box 21668
Juneau, Alaska 99802-1668

February 19, 2004

MEMORANDUM FOR: PPI/SP - Susan A. Kennedy

FROM: For F/AK - James Balsiger

SUBJECT: Alpine Satellite Development Plan, DEIS - 0401 - 02

Please find attached the Alaska Region's comments on the Alpine Satellite Development Plan Draft Environmental Impact Statement (DEIS). If you have any questions regarding the comments, please contact Larry Peltz at (907)271-1332 or Lawrence.Peltz@noaa.gov.

Attachment

Alpine Satellite Development Plan EIS
Entrix Project Team
3701 E. Tudor Road, Suite 208
Anchorage, AK 99507

Dear Project Team,

The National Oceanic and Atmosheric Administration's National Marine Fisheries Service (NOAA Fisheries) has reviewed the Alpine Satellite Development Plan Draft Environmental Impact Statement (DEIS) developed for the U.S. Department of the Interior, Bureau of Land Management (BLM). This DEIS responds to a proposal by ConocoPhillips Alaska Inc. (CPAI) to develop five satellite oil production pads for its Alpine field. The DEIS presents 4 action alternatives and a no action alternative. Alternative A is the applicant's proposed action. Each of the other 3 action alternatives is built around a unifying theme. The theme of Alternative B is Conformance with Stipulations. All activities would be conducted and facilities sited in complete accordance with the Northeast National Petroleum Reserve - Alaska (NPR-A) Integrated Activity Plan Environmental Impact Statement (IAP/EIS). The theme of Alternative C is Alternative Access Routes. This alternative includes alternate road routes and bridge locations that differ from those proposed by the applicant. The theme of Alternative D is Roadless Development. All gravel roads would be eliminated and the production pads would be accessible only by air, ice road, and low-pressure vehicles.

NOAA Fisheries legal authorities as they relate to review of this action are summarized in Table 1.1.4-1 (page 1-12) of the DEIS. These authorities include the Fish and Wildlife Coordination Act, Magnuson-Stevens Fishery Conservation and Management Act, Marine Mammal Protection Act and Endangered Species Act. Our comments on this DEIS pertain to these authorities.

Resource Concerns

NOAA Fisheries is concerned regarding the potential impacts of the project on water resources, fish, marine mammals, and threatened and endangered species. All potential impacts are listed in the Summary section of the DEIS. As stated on page S-8, the primary concern for water resources is the impact to rivers and creeks "if construction and operation activities associated with roads, pads, and pipelines block, divert, impede or constrict flows. Blockages or diversions to areas with insufficient flow capacity can result in seasonal or permanent impoundments. Constricting flows can result in increased stream velocities and a higher potential for ice jams, ice impacts, scour, and streambank erosion." The fish impacts of greatest concern to NOAA Fisheries are listed on page S-11 of the DEIS. These impacts include oxygen depletion caused by water withdrawal, oxygen depletion caused by winter bridge construction over the Nigliq Channel, encroachment of bridge approaches into floodplain terraces, and culvert failure that blocks or interrupts fish movement. Potential impacts to marine mammals are summarized in the

DEIS on page S-14. The DEIS summarizes potential impacts to threatened and endangered species on page S-15. In both instances, air traffic disturbance is NOAA Fisheries' greatest concern.

Alternatives

All of the DEIS alternatives except the no action alternative (Alternative E) would have potential impacts to resources of concern to NOAA Fisheries. Alternatives A, B, and C all involve building roads. Alteration of surface hydrology patterns and changes to stream flows associated with bridges and culverts are potential impacts that could affect fish species. The extent of impact varies among the alternatives. Alternative B has fewer miles of roads and no major stream crossing. Alternative C has the most miles of roads and some major stream crossings. The effects of the stream crossings can be mitigated (page 4A.3-28) by constructing the bridges so that they span the floodplain terraces in addition to the main channel. The impact of bridges and culverts associated with these 3 alternatives cannot be fully evaluated until the bridge plans are developed. Culvert crossings can be a problem if the culverts are undersized or a crossing is poorly designed. Historically, culverts have been prone to failure, but experience has led to better performance (page 4A.3-25). Mitigating culvert impact is possible but the impact of these alternatives cannot be evaluated until construction plans are developed.

Alternative D is the roadless alternative. Impacts to fish would be minimal with this alternative. This alternative could pose a greater impact to marine mammals and endangered species due to increased air traffic. Control of traffic patterns and flight elevations could mitigate most if not all the potential impact.

Cumulative Impact Assessment

The DEIS projects that the cumulative impact of the preferred development (Alternative A) to NOAA Fisheries concerns will be minimal, which could be true if proper mitigative measures are employed. The DEIS provides a list of potential mitigative measures, but provide no indication that these measures will be implemented or followed by CPAI.

One major issue that the DEIS fails to address adequately in the cumulative impacts section is the State of Alaska proposed road to Nuiqsut and NPR-A. This road was originally proposed to be a 102 mile road from the Dalton Highway. More recently this proposal has been modified to be an 18 mile road connecting the Spine road to the west bank of the Colville River. The Bureau of Indian Affairs would then construct a 3 mile spur road to Nuiqsut.

The DEIS stated that "construction of a state road is too uncertain and any realistic date for its construction is too far into the future for an alternative dependent upon the state's road to be a reasonable alternative ...." The state has begun the permitting process for this road. Permits have been obtained to conduct test drilling for bridge construction. The construction schedule

for this road is not speculative and it should be given greater consideration in the cumulative impacts section.

Recommendations

Alternative D would have the least potential impact to NOAA Fisheries resources of concern. However, CPAI may not find a roadless alternative to be an acceptable form of development. Each of the 3 alternatives with roads contains elements of concern to NOAA Fisheries. Regardless of which alternative is ultimately selected, NOAA Fisheries offers the following recommendations for inclusion in the final alternative:

- Delete the road between CD-1 and CD-3. The complex drainage system in the lower Colville River Delta makes this road impracticable. This road could cause major changes in stream flow dynamics and alter fish habitats. Operate CD-3 as a remote facility with air access only.
- Use the proposed state bridge over the Colville River and delete the Nigliq Channel Bridge. Building two large and expensive bridges within 15 miles of each other appears to be redundant and would double the potential impacts to fish habitats in this dynamic and environmentally important river. A large bridge will result in some impact to fish habitats, and consolidating the two proposed bridges will minimize those impacts. A road would connect CD-1, CD-2 and CD-4. Winter connections to the permanent road could be made with an ice road. Operations would continue as they exist now without a permanent road to these facilities. CD-5, CD-6 and CD-7 could be connected to the permanent state road.
- All bridges should span as much of the floodplain as necessary to maintain existing stream dynamics. Bridges should not cause any constriction that will result in stream scouring, bank erosion or any other impact to fish habitats.
- Design adequate sized culverts to maintain proper flows and fish passage. Properly operating culverts will allow fish passage and use of important seasonal habitats.

NOAA Fisheries appreciates the hard work BLM, the DEIS Development Team, and other agencies have put into the development of this DEIS. NOAA Fisheries looks forward to the continued cooperation of all groups as the final EIS is developed, and we offer our assistance in developing further design details for the project to minimize impacts to living marine resources. Please contact Larry Peltz at (907)271-1332 if you have any questions.

Sincerely,

Susan A. Kennedy
Acting NEPA Coordinator