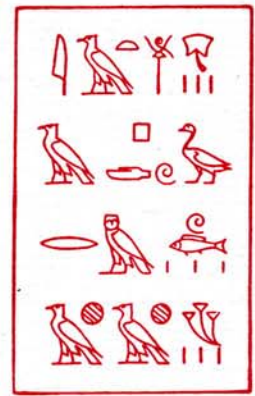


# THE WILDLIFE SOCIETY

## ALASKA CHAPTER



Alaska Chapter of The Wildlife Society  
P.O. Box 242454  
Anchorage, Alaska 99524-2454

24 December 2005

U. S. Army Corps of Engineers  
ATTN: Colonel Timothy J. Gallagher  
District Engineer, Alaska District  
U.S. Army Corps of Engineers  
Post Office Box 6898  
Elmendorf AFB, Alaska 99506-6898

Dear Colonel Gallagher:

The Alaska Chapter of The Wildlife Society (Alaska Chapter TWS) is a professional society founded in 1971 comprised of over 200 wildlife professionals employed by state, federal, and borough resource agencies, academic institutions, non-governmental conservation organizations, and private industry. The Alaska Chapter TWS is dedicated to excellence in wildlife stewardship through science and education. Our mission is to enhance the ability of wildlife professionals to conserve biological diversity, sustain productivity, and ensure responsible use of wildlife resources in Alaska for the benefit of society. The Alaska Chapter is part of The Wildlife Society, an international non-profit scientific and educational organization comprised of over 8,000 members, serving and representing wildlife professionals in all areas of wildlife conservation and resource management.

The Alaska Chapter TWS has reviewed the Public Notice of Application (POA-2005-1576, Nigliq Channel, Colville River) by ConocoPhillips Alaska, Inc. (CPAI). CPAI proposes to construct a new production pad (CD-5), and 4.2 miles of all-season road within the National Petroleum Reserve-Alaska (NPR-A) and the Colville River Delta, as well as a 1,250 foot-long bridge over the Nigliq Channel of the Colville River.

The Colville River Delta is one of the most biologically productive and diverse riparian areas in Arctic Alaska and is considered an aquatic resource of national importance (U.S. Fish and Wildlife Service 1997, 2002). It is the largest and most complex delta in northern Alaska with a watershed draining nearly 30 percent of the North Slope. The river and connected water bodies support 20 species of fish, including important subsistence species (Moulton 2001, 2002). Colville River wetlands provide breeding habitat for numerous species of waterbirds including tundra swans, black brant, greater white-fronted geese, spectacled eiders (listed as Threatened under the Endangered Species Act), and yellow-billed loons (petitioned for listing as Threatened) (Johnson et al. 2000). The salt marsh and coastal tide flat habitats of the outer Delta are the most

extensive found along the Beaufort Sea coast of Alaska (Johnson et al. 1998) and provide critical staging and foraging habitats for hundreds of thousands of shorebirds during fall migration (Andres 1994).

The Alaska Chapter TWS believes the current proposal by CPAI could result in significant impacts to fish and wildlife resources on the Colville River Delta. The proposed bridge provides an all-season connection between the NPR-A and the Alpine development in the Colville River Delta. The connection would allow construction materials and supplies for future NPR-A developments to be stored and shipped from Alpine, thereby creating an industrial hub within the most important river delta and riparian ecosystem in arctic Alaska. If permitted, the expected increase in vehicular and air traffic, personnel, and equipment storage will increase the amount and geographic distribution of industrial infrastructure (e.g., roads, storage pads, personnel housing, and pipelines) which ultimately will cause the continued loss and degradation of fish and wildlife habitats. Increased development and infrastructure on the Delta could also increase predator and scavenger populations including gulls, ravens and foxes resulting in decreased productivity of tundra-nesting birds in the area. The proposed pad, road, bridge, and associated activities of this project appear to depart substantially from the intent of the Corps of Engineers 1998 Alpine permit which explicitly minimized surface activity and industrial infrastructure on the Colville Delta.

In addition to potential impacts within the Colville delta, the project would create the first road access into the NPR-A. The Bureau of Land Management's 1998 Record of Decision governing oil leasing and development within eastern NPR-A included a no-exception stipulation that prohibited permanent roads being connected to a road system or docks outside the Northeast NPR-A planning area (BLM 1998). The Alaska Chapter TWS requests that the Corps clarify how the issuance of a permit for CD-5, as proposed, would be consistent with the BLM stipulation.

Prior to permitting oil development and production westward of the Colville and into the NPR-A, the Corps should adopt a comprehensive planning approach in lieu of the current piece-meal, project-by-project design. The Alaska Chapter TWS believes the Corps, in consultation with fish and wildlife agencies, conservation organizations, and industry should develop and implement a comprehensive plan to avoid the unnecessary loss of fish and wildlife habitats. The Alaska Chapter TWS requests the Corps adopt a comprehensive planning approach *prior* to issuing permits for this project or other projects allowing access into the NPR-A.

The Alaska Chapter TWS requests the Corps consider the direct, indirect, and cumulative effects of the proposed CD-5 development on the high-value wetlands and riparian habitats of the Colville River Delta. The proposed bridge crossing of the Nigliq Channel predisposes the development of an industrial hub at Alpine and may preclude the development of a more centrally-located and less-sensitive site within NPR-A. We believe the CD-5 pad can be reasonably developed without an all-season connection to Alpine, and we believe this to be a less damaging alternative to the plan forwarded by CPAI.

The Alaska Chapter TWS appreciates the opportunity to comment on this permit application. If you need additional information or have questions regarding any of the comments in this letter, please contact me at 301-897-9770 or via electronic mail at [eric@wildlife.org](mailto:eric@wildlife.org).

Sincerely,



Eric J. Taylor  
President

Literature Cited:

Andres, B. A. 1994. Coastal zone use by postbreeding shorebirds in northern Alaska. *Journal of Wildlife Management* 58:206-213.

BLM. 1998. Northeast National Petroleum Reserve-Alaska Integrated Activity Plan/Environmental Impact Statement Record of Decision. U.S. Dept. of Interior (USDOI), Bureau of Land Management in cooperation with USDOI, Minerals Management Service. 44 p.

Johnson, C.B., B. E. Lawhead, J. R. Rose, M. D. Smith, A. A. Stickney, and A. M. Wildman. 1998. Wildlife studies on the Colville River Delta, Alaska, 1997. Sixth annual report prepared for ARCO, Alaska, Inc., Anchorage, and Kuukpik Unit Owners, by ABR, Inc., Fairbanks, Alaska. 144 p.

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Moulton, L. L. 2001. Harvest estimate and associated information for the 2000 Colville River fall fishery. Final report prepared for PHILLIPS Alaska, Inc. and B. P. Exploration (Alaska) Inc., Anchorage, Alaska. 53 p.

Moulton, L. L. 2002. Fish habitat in lakes of the Colville River Unit satellite development CD-South: 2002. Final report prepared for ConocoPhillips, Alaska, Inc. and Anadarko Petroleum Corporation, Anchorage, Alaska. 30 p.

USFWS. 1997. Letter of 6 June from Patrick Sousa (U.S. Fish and Wildlife Service, Fairbanks) to Col. Peter Topp (U.S. Army Corps of Engineers, Anchorage), Re: 2-960874 Colville River 18. 10 p.

USFWS. 2002. Letter of 6 March from Patrick Sousa (U.S. Fish and Wildlife Service, Fairbanks) to Col. Peter Topp (U.S. Army Corps of Engineers, Anchorage), Re: 2-2001-0331 and 2-2001-0322 Colville River Unit. 15 p.